



Successfully Transitioning to a New Model

for the Verification of Auditor Competence

*Response to Stakeholder Consultation
Call for Participation – December 2021*

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Introduction and overall response

- 1.1. The Global Food Safety Initiative (GFSI) ran a stakeholder consultation between 28th October and 3rd December in relation to Feature 1 of the Race to the Top (see appendix 1). GFSI acknowledged that the new approach defined in this feature represented significant changes to the certification ecosystem, and invited interested stakeholders to comment on proposed mechanisms to enable:
- a minimised burden on the current certification ecosystem, in line with the objective of Feature 1,
 - an optimised transition period to deliver the benefits of the new approach to all affected stakeholders, and
 - momentum behind the new arrangements.
- 1.2. 93 respondents took part in this consultation, with a balanced representation of food businesses, Certification Programme Owners (CPOs), Certification Bodies (CBs) and auditors (figure 1). No Accreditation Bodies (ABs) responded to the consultation, although their role in this transition was mentioned several times by the other respondents. It is worth noting that GFSI is engaging ABs directly through the International Accreditation Forum (IAF) and has asked for a taskforce to be set up in that organisation to address any challenges or questions pertaining to accreditation that may arise during the transition period.

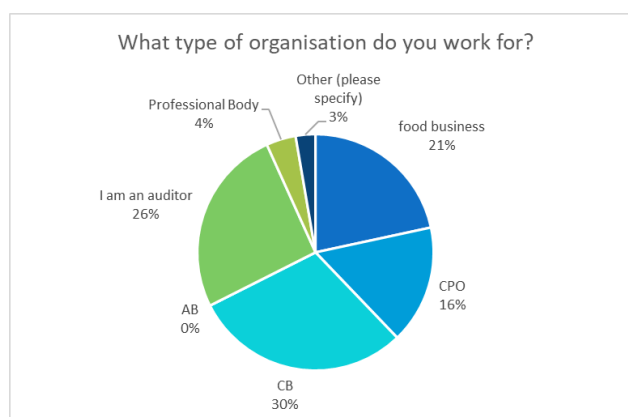


Figure 1

- 1.3. Overall, the respondents supported the proposed transitional arrangements and valuable recommendations were made to improve upon the proposal. In particular, the suggestion to run a closely monitored pilot to test the new approach on a smaller scale before rolling it out to the whole ecosystem was very well received.
- 1.4. Responses also showed that the new approach garners an improved level of understanding and trust overall, along with heightened trust in the ability of professional recognition bodies (PRB) to assess auditors' competence (figure 2). Answers were sometimes moderated by a wish for more details about the PRBs themselves and their criteria for assessing auditors.

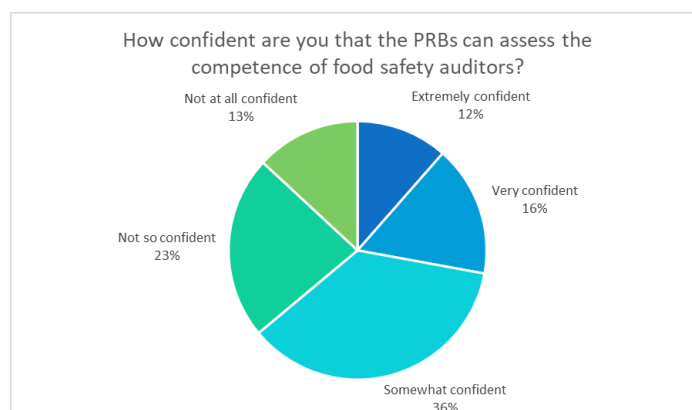


Figure 2

1.5. Some misunderstandings remain, specifically around the following points:

- GFSI defines the *what*, not the *how* of food safety; for this reason, the GFSI Benchmarking Requirements for PRBs do not prescribe how competence should be verified, rather what competence should be verified. They also set clear expectations for the PRB's governance to ensure they will select robust and efficient verification criteria and activities,
- the scope of the GFSI recognition for PRBs is purposely restricted to the competence expected in all food safety auditors, regardless of the certification programme they are auditing against. Competence specific to Certification Programmes are not in the scope of GFSI's recognition, these are for the CPOs to define,
- the Certification Bodies retain their role of verifying that the auditors have the competence required by the Certification Programme's rules and the applicable accreditation criteria. The new approach simplifies this process by establishing the registration to a GFSI-recognised PRB as proof of competence.

1.6. This document analyses the answers of the respondents by key topics addressed in the consultation:

- the overall transitional arrangements,
- the requirements for Professional Recognition Body (PRBs),
- the implications for auditors, and
- the requirements for CPOs.

1.7. The last section sums up the conclusion of this analysis into an overall plan for a successful transition. If you are keen to find out about the next stage and how to get involved, you can go straight to section 7 of the document. If you would like to understand how our stakeholders influenced this final transition plan, enjoy sections 3 to 6!



The overall transitional arrangements

1.8. The respondents were asked if a transition of three years, including a pilot, was an acceptable proposal. The steps taken during this period are illustrated in **figure 3** below.



Figure 3

1.9. Nearly half the respondents considered that this proposed duration was “about right”, the other half considering it “too short” or “much too short” (figure 4).

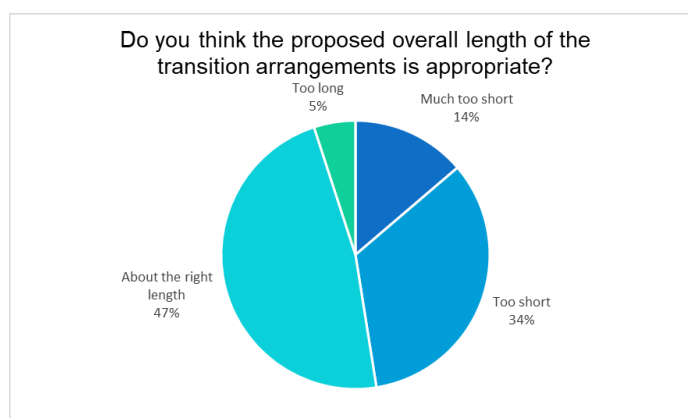


Figure 4

1.10. Different categories of respondents responded differently, sometimes reflecting their current sentiment towards the overall new proposed approach: 88% of food businesses replied that this proposal was about the right length, CPOs virtually all considered the transition period was too short overall, while respondents who stated that three years was too long, were either auditors or CBs.

1.11. The consultation set out that a pilot will be run at the beginning of the transition with the objectives proposed below:

- the clarity and practicality of the PRB Benchmarking Process and Requirements,
- the benefits of mutualisation of auditor qualification efforts against GFSI’s current Requirements to reduce redundancies and burden,
- a focus on competence (knowledge, skills and behaviours) to allow candidates to come into the profession with equivalent competence gained through different career paths, and
- the establishment of an attractive profession offering a career professional pathway through professional development.

1.12. All but one of the proposed objectives for the pilot were selected by more than 60% of respondents. A few respondents doubted that the fourth proposed objective, the establishment of an attractive profession, could be measured within the timeframe of the pilot or the transition, which may explain its lower popularity with respondents (table 1).

Proposed objective of the pilot	% of respondents in favour of this objective
The clarity and practicality of the PRB Benchmarking Process and Requirements.	70%
The benefits of mutualisation of auditor qualification efforts against GFSI's current Requirements to reduce redundancies and burden	66%
A focus on competence (knowledge, skills and behaviours) to allow candidates to come into the profession with equivalent competence gained through different career paths.	69%
The establishment of an attractive profession offering a career professional pathway through professional development.	38%

Table 1: proposed objectives of the pilot

1.13. Several respondents highlighted the importance for the pilot to verify the roles and responsibilities illustrated in the below figure 5.

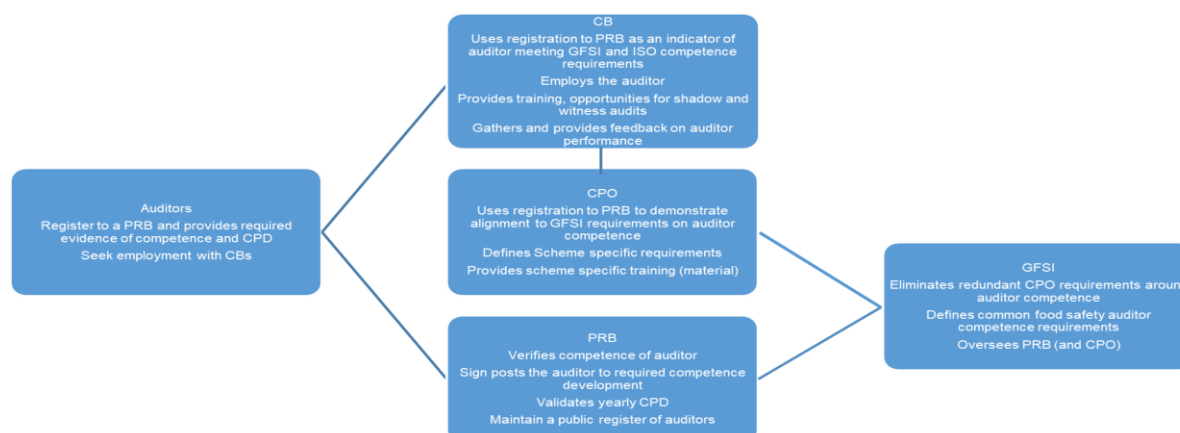


Figure 5: roles and responsibilities in the new approach

1.14. Many suggestions were made for potential metrics to be monitored throughout the pilot, all around:

- number of auditors entering / leaving the profession,
- quality of third-party audits / feedback from auditees,
- competence of auditors on the ground,
- burden on auditors, CBs and CPOs of the current system and the new approach,
- complementarity of the CPO and PRB requirements (identify duplicates),
- communication links between the CBs, CPOs and PRBs,
- once registered, accepted everywhere (acceptability of all PRBs' registration by CPOs and CBs),
- onboarding time current vs. new,
- number of GFSI Requirements for PRBs to review, and

- time and cost of PRB Benchmarking Process.

1.15. Finally, the consultation explored the establishment of a monitoring group for the pilot.

1.16. Overall, respondents suggested that the interest of the CPOs, PRBs, auditors, CBs and food businesses were all represented in the monitoring group.

1.17. There were pragmatic recommendations amongst the comments to help keep the monitoring group to a reasonable size and able to deliver its mandate:

- members should be representing the most impacted parties,
- members should be able to provide data to help evaluate the pilot against the identified objectives,
- members should take part in the spirit of constructive collaboration and transparency,
- members should have a good understanding of the current AND proposed approach, and
- members should represent a varied sample from across regions, size and industry scope.



The Requirements for PRBs during the transition period

1.18. The consultation identified that the transition should start with the establishment of GFSI-recognised PRBs. This was justified by asking auditors to register to PRBs only once those had successfully completed their GFSI Benchmarking, to minimise impact of this transition on auditors.

1.19. The consultation asked stakeholders which GFSI Benchmarking eligibility criteria, and steps of the Benchmarking Process, if any, PRBs should be given concessions against during the transition period (table 2).

ANSWER CHOICES	RESPONSES	
The Professional Recognition Body shall be accredited against ISO/ IEC 17024 by an Accreditation Body member of the International Accreditation Forum (IAF) and signatory to the Multilateral Recognition Arrangement (MLA) (see https://iaf.nu/en/recognised-abs/),	51%	35
The Professional Recognition Body can demonstrate experience in establishing and running a successful Professional Recognition Programme for at least 100 registrants (but not necessarily dedicated to auditors or food safety),	43%	30
The Professional Recognition Programme is established and is not undergoing any significant changes,	38%	26
The Professional Recognition Body can demonstrate impartiality from any food safety certification, conformity assessment, training and / or Certification Programme Owner activities	30%	21
There is endorsement from a minimum of three organisations committing to the Professional Recognition Body, demonstrating the market need for their Professional Recognition Programme	29%	20
The Professional Recognition Body has completed the GFSI self-assessment form to demonstrate that it is in alignment with the GFSI Benchmarking Requirements	20%	14
The Professional Recognition Body is a legal entity	13%	9
none of the above	13%	9
The Professional Recognition Body does not have any practices deemed as restricting access to or choice within the market they operate in,	7%	5

Table 2: PRB eligibility criteria for GFSI Benchmarking

1.20. 13% of respondents considered that no concessions against GFSI eligibility criteria should be given to PRBs; this number rose to 30% for concessions against the GFSI Benchmarking Process.

1.21. These answers were complemented with recommendations that any concessions should be granted with extreme care so as not to compromise the trust in the PRB's ability to verify auditors' competence.

1.22. More than half of respondents supported a concession be granted against the requirement for the PRB to be accredited to ISO/IEC 17024. Many comments stated that the accreditation process should be started when the PRB applies for GFSI assessment.

1.23. When they recommended a concession, respondents mostly then stated that PRBs who do not meet the full GFSI Requirements at the end of the transition should lose GFSI recognition, with a transfer of registered auditors to another GFSI-recognised PRB similar to the practice of client's transfer when a CAB is suspended.

1.24. This transfer should be facilitated by a transfer of information from PRB to PRB (with the authorisation of the auditor) and a recognition of the verification work of the incumbent PRB by the new PRB.

1.25. A smaller number of respondents recommended granting an extension to the PRBs, during which they would not be allowed to accept new registration and would resolve any misalignment to the Requirements. This solution would be equivalent to extending the transition period.



The implications for auditors during the transition process and beyond

1.26. The consultation suggested that all auditors are considered competent and allowed to continue auditing if not registered to a GFSI-recognised PRB, is acceptable. Then, as auditors registered to a GFSI-recognised PRB, they would not be required to comply with the incumbent system anymore.

1.27. A majority of respondents agreed with this proposal in principle (figure 6).

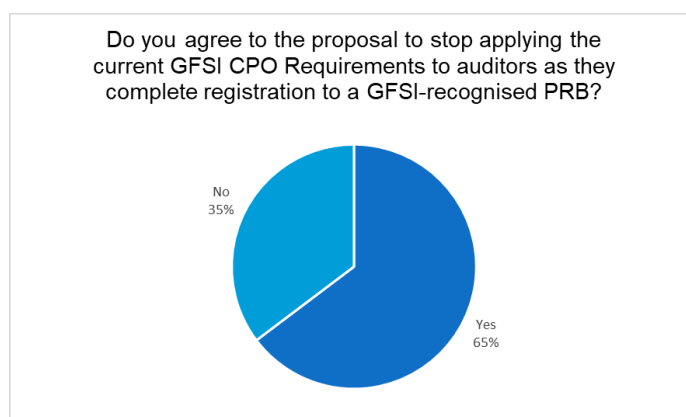


Figure 6: exclusive use of the current and new approach for auditor qualification.

1.28. Respondents recognised that this proposal had significant benefits, including:

- elimination of any redundancies,
- setting a clear bar and harmonisation process for auditor competence and qualification,
- creating a clear and positive path forward for auditors, and
- enabling auditors to continue auditing throughout the transition period without disruption.

1.29. Several respondents highlighted that this proposal would only achieve its objective of reducing burdens on auditors if CPOs identified early in the transition which of their current auditor qualification criteria would not apply to auditors registered to a GFSI-recognised PRB.

1.30. Several respondents feared that the transition would lead to auditors leaving the profession, through either:

- a demotivation to submit to a new qualification system, or
- their inability to meet the registration criteria set by the Professional Recognition Body.

1.31. A few respondents recommended that the current auditors be grandfathered into the new approach, or not asked to transition and continue operate under the incumbent rules. Although this option eliminates the burden of this transition for current auditors, it was rejected as it effectively delayed the full transition to the new approach until the last “grandfathered” auditor retired. Besides, several comments also supported a reassessment of current auditors against the bar set by the new approach. As shown in figure 7, the confidence in the current auditor’s ability to meet that bar was varied amongst respondents, which supports the rejection of a grandfathering system.

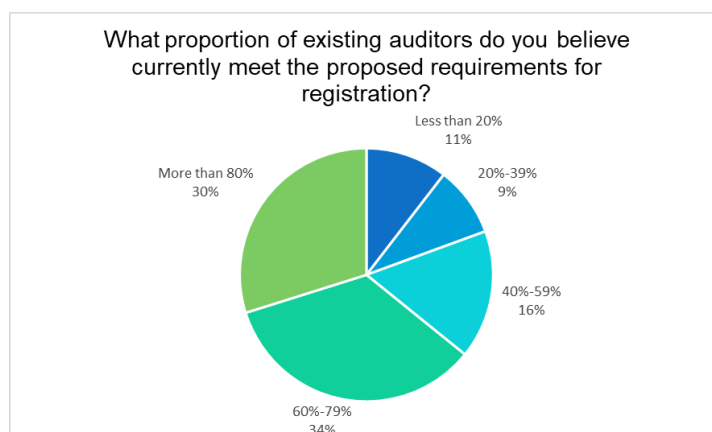


Figure 7: confidence in current auditor's competence

1.32. The consultation then explored whether the potential roles of “junior auditors”, and of “lead auditors” should be established in the new approach, as mechanisms to attract and retain auditors in the profession. Those roles would exist alongside the grade of “auditor” and recognise individual experience.

1.33. On both matters, the majority of respondents preferred that this should be evaluated during the pilot (figures 8 and 9).



Figure 8: support for the creation of a junior auditor (to attract talent to the profession)

Figure 9: support for the creation of a lead auditor

1.34. Views were divided around the value of a role of junior auditor:

- the term was sometimes perceived as pejorative, particularly if this was applied to experienced auditors while they complete their registration to a PRB,
- there were concerns about less experienced professionals auditing, even under supervision, and strong views that auditors are competent or not,
- other respondents drew a positive parallel between this proposal and the current practice of “trainee auditors” under supervision as they become qualified,
- there was also support that this could be a recognised steppingstone for newcomers into the profession.

1.35. Overall, the role of junior auditor had some support as a means to attract new professionals into auditing but less so to support experienced auditors through the transition to the new approach (figure 8 and 10).

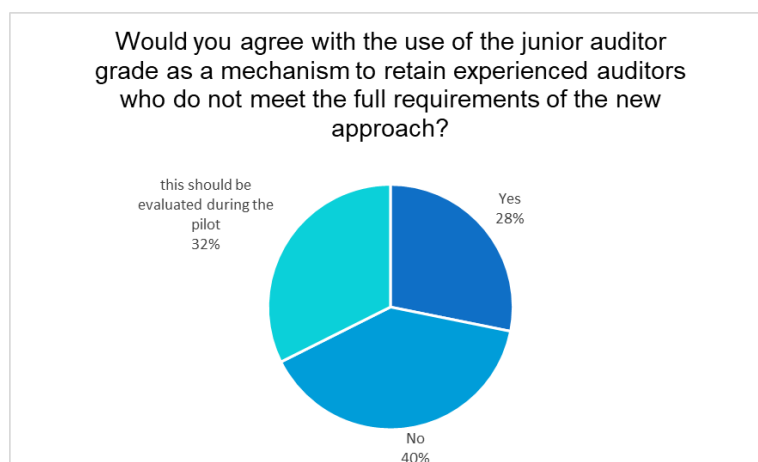


Figure 10: support for the creation of a junior auditor (to retain experienced auditors)

1.36. The role of lead auditor had more support than the role of junior auditor.

- Some respondents called for keeping the system simple and not creating “artificial” grades of auditors; there was an argument to keep one definition of competent.
- Some respondents referred to the existing definition of lead auditors in ISO standards and recommended clarifying the relationship between this definition and the proposal laid in the consultation.
- Several respondents were open to the proposal, making the parallel with similar progression available in other professions. They highlighted that a clear definition of each grade was required to test its value for the profession of auditors.



The Requirements for CPOs and CBs during the transition process and beyond

1.37. The consultation suggested two key mechanisms to minimise further the burden of the new approach on all affected parties:

- GFSI to review its current Benchmarking Requirements applicable to CPOs and eliminate any redundancies with the GFSI Benchmarking Requirements applicable to PRBs, and
- CPOs to review their current scheme rules for auditor qualification and eliminate any redundancies with the PRBs' responsibilities.

1.38. Both proposals were strongly supported by respondents (figure 11 and 12)

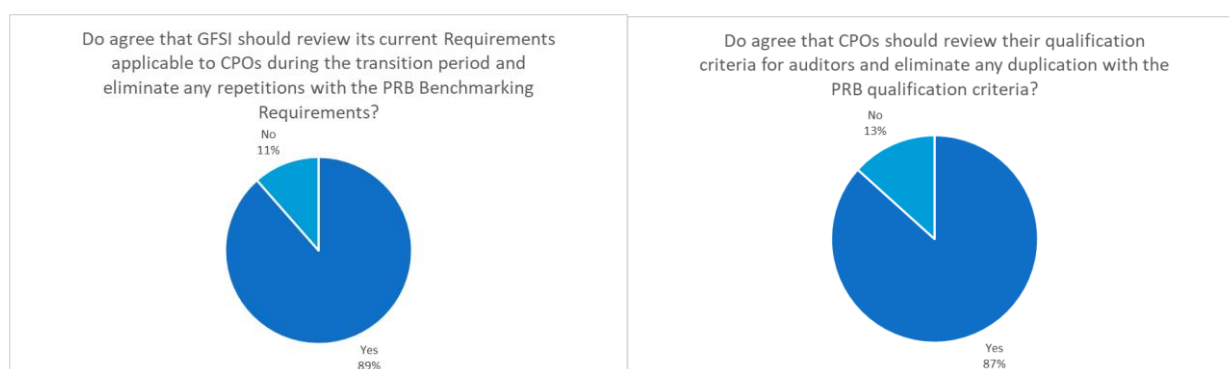


Figure 11: support for a review of GFSI Requirements on CPOs

Figure 9: support for a review of CPO Requirements on auditors

1.39. The main reason for this strong support was identified as the elimination of duplicated efforts between the CPOs, the PRBs and the CBs during and after the transition period.

1.40. Respondents then made other recommendations to minimise burden during the transition period, mainly around ensuring:

- sufficient GFSI-recognised PRBs to cater for all auditors and regions,
- acceptance by the CPOs of registrations to GFSI-recognised PRBs without any restrictions,
- clearly defined and accepted roles and responsibilities of all involved parties,
- a mechanism of close and collaborative monitoring of the transition involving all affected parties, with KPIs and support to CPOs to review their rules,
- the optimised transfer of qualification information between the CPOs, CBs and PRBs, possibly supported by existing IT systems, and
- the exact complementarity of the GFSI Requirements for CPOs and PRBs on one hand, and between the CPO's and the PRBs' selection criteria on the other (with neither loss nor duplication).

1.41. Several respondents, although supporting the proposal, raised that this would potentially mean a new version of the GFSI Benchmarking Requirements, and a new version of the Certification Programmes' rules. Transition to new versions of those documents can be burdensome in itself and need to be carefully considered.

2. Pulling it together: the transitional arrangements

- 2.1. GFSI will set a transition period with a targeted length of three years from January 2022 to December 2024. At the end of this transition period,
 - GFSI will have revised its Benchmarking Requirements applicable to CPOs to eliminate any duplication with the GFSI Benchmarking Requirements applicable to PRBs,
 - GFSI-recognised CPOs will have amended their certification programme's rules to accept and require registration to a GFSI-recognised PRBs for all auditors, and eliminate duplications with the PRB's verification, and
 - all practising auditors will be registered to a GFSI-recognised PRB.
- 2.2. The duration of the transition will be re-evaluated every year based on:
 - required time to complete a meaningful pilot and consider its outcome, and
 - progress made to address identified challenges to a successful transition
- 2.3. The transition will therefore start with a pilot involving:
 - PRBs who have applied for GFSI recognition, and
 - GFSI-recognised CPOs volunteering to adopt the new approach early and as part of the pilot.
- 2.4. The objectives and measures of success of the pilot will be:
 - validate the clarity and practicality of the PRB Benchmarking Process and Requirements,
 - number of GFSI Requirements for PRBs amended at the end of the pilot
 - time and cost of PRB Benchmarking Process
 - validate the benefits of mutualisation of auditor qualification efforts against the GFSI's current Requirements to reduce redundancies and burden,
 - burden on auditors, CBs and CPOs of the current system and the new approach, e.g., onboarding time, as measured by feedback from affected parties
 - seamless transition of auditors from one system to the new one
 - complementarity of the CPO and PRB requirements on auditors (identify duplicates)
 - validate the value of focussing on competence (knowledge, skills and behaviours) to allow candidates to come into the profession with equivalent competence gained through different career paths,
 - number of auditors entering / leaving the profession, and why (e.g., not meeting the PRB criteria, (de)motivated by the new approach)
 - quality of third-party audits / feedback from food businesses
 - validate the value of the potential role of "junior" auditor and "lead" auditors
 - perception of the selected terminologies
 - number of auditors entering / leaving the profession, impact of these two potential roles on this number.
- 2.5. The pilot and the transition will be monitored by a monitoring group constituted of:
 - PRBs who have applied for GFSI recognition,
 - GFSI-recognised CPOs volunteering to transition to the new approach, and
 - food businesses signatories of the GFSI Coalition of Action volunteering to take part in the monitoring group.
- 2.6. CB and auditor feedback will be gathered through the CPOs and the PRBs respectively, based on structured discussions agreed by the monitoring group.
- 2.7. During the transition period:
 - PRBs may apply for GFSI Recognition if they are not accredited to ISO/IEC 17024 as long as they can demonstrate that their accreditation process has been initiated,
 - the GFSI Benchmarking Process will be applied in full and without any concessions, and

- as auditors register to a GFSI-recognised PRB, they will not be subjected to the incumbent qualification and monitoring system.

2.8. At the end of the transition:

- auditors will need to be registered with a GFSI-recognised PRB to continue auditing for GFSI-recognised Certification Programmes,
- GFSI-recognised PRBs will be required to be accredited or risk seeing their recognition suspended or withdrawn,
- if sanctions are taken against a GFSI-recognised PRB, transfer of any auditors registered with this PRB to another GFSI-recognised PRB will be facilitated by key elements 1.12, 1.13 and 3.3 of Part II of the GFSI Benchmarking Requirements for PRB (table 3).

1.12	Crisis management/ business continuity	<p>The Professional Recognition Body shall establish, implement and maintain a crisis management procedure.</p> <p>The procedure shall include, among others, auditors' notification and provisions on auditor status in case of Professional Recognition Body's cessation of activities, suspension and / or withdrawal of GFSI recognition, or suspension and / or withdrawal of accreditation.</p>
1.13	Auditors 'transfer	<p>The Professional Recognition Body shall define requirements when auditors switch between GFSI-recognised Professional Recognition Programmes proving up-to-date registration. This should include but not be limited to evidence of the auditors' evaluation history, last assessment, etc.</p>
3.3	Professional Recognition Body notification to auditors	<p>The Professional Recognition Body shall notify auditors in due time about any change to the Professional Recognition Program that may affect the auditor's continued registration.</p> <p>In case of Professional Recognition Program change, the Professional Recognition Body shall define and communicate an achievable transition period.</p>

Table 3: GFSI Benchmarking Requirements for PRB: transfer of registrants



3. Taking part: call for participation

Become a GFSI-recognised PRB

- 3.1. If you wish to become a GFSI-recognised PRB, you may do so by completing the application form that you will find amongst the [GFSI Benchmarking Requirements for PRBs](#), and email it to gfsibm@theconsumergoodsforum.com.

Join the pilot monitoring group

- 3.2. If you are:
- a PRB who has applied for GFSI recognition
 - a GFSI-recognised CPO who wish to adopt the new approach defined in feature 1 of the Race to the Top
 - a retailer or a manufacturer signatory of the [GFSI Coalition of Action](#)
- 3.3. You are invited to nominate a member of your team to join the pilot monitoring group.
- 3.4. This group will meet monthly to assess the pilot against the objectives and measures defined in paragraph 7.4 of this document.
- 3.5. Members of the group will need to:
- have a good understanding of the food safety certification process,
 - understand and support the new approach for auditor qualification defined in this document, and
 - bring data from their businesses to contribute to the evaluation of the above measures.
- 3.6. If you wish to join this group or nominate a member of your team for it, please complete this short [application form](#).

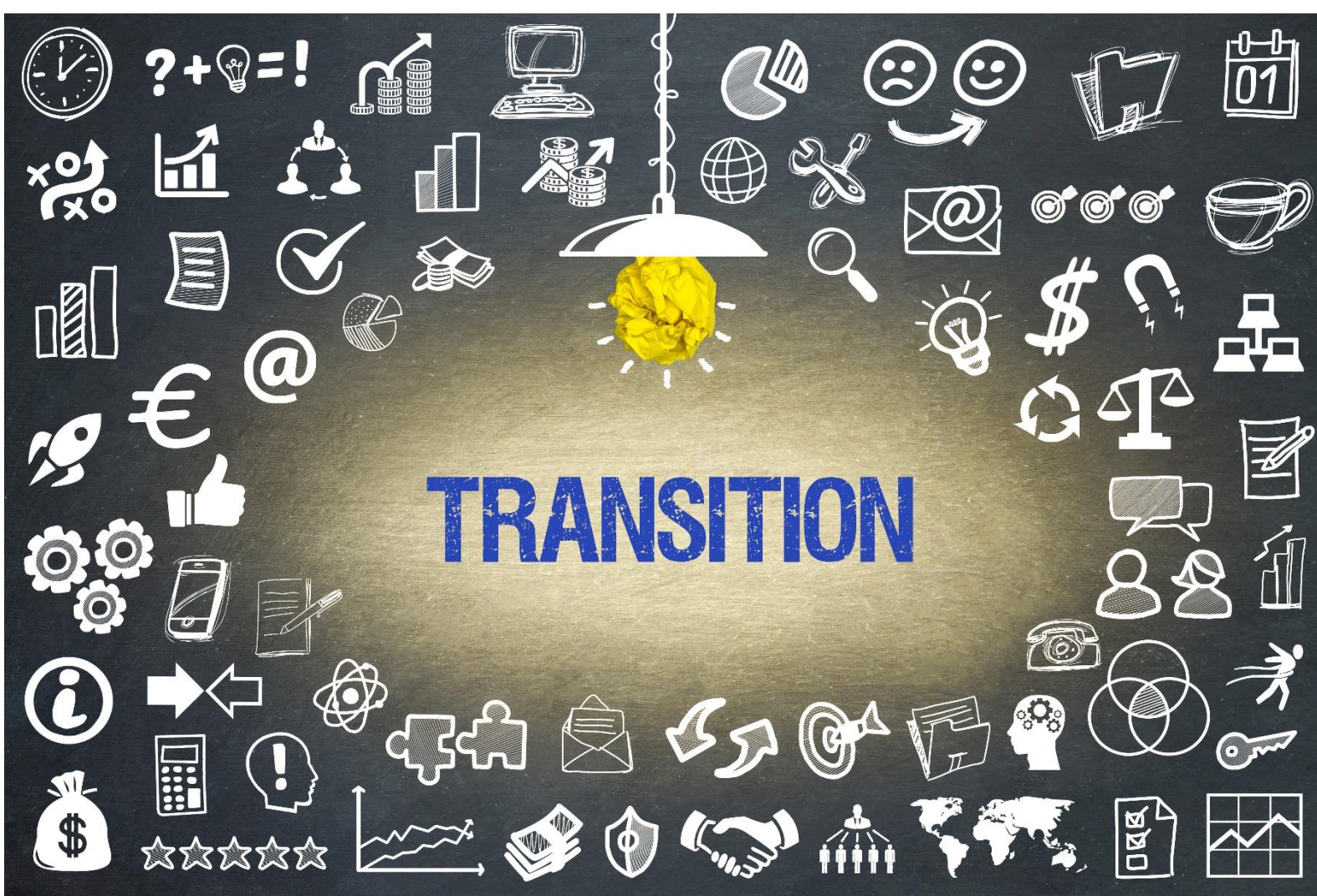
Become a GFSI Benchmark leader

- 3.7. GFSI is recruiting a benchmark leader to assess any applicant PRB to GFSI Recognition.
- 3.8. The responsibilities and requirements for this role are defined in table 4 below. If you are interested in becoming a GFSI benchmark leader and fit the below, please email a motivation letter and your CV to gfsibm@theconsumergoodsforum.com.

Role description	The Benchmark Leader role is a fixed contract role with the primary responsibility of conducting benchmark assessment activities of Professional Recognition Bodies (PRBs) on behalf of GFSI, that entails document reviews, office visits and communication of results and outcomes.
Responsibilities	Manage the relationship with the allocated PRBs Conducting assessment activities against the GFSI Benchmarking requirements for PRBs
Education	Tertiary education in a science or related discipline; or knowledge corresponding to
Work experience	Minimum 5 years in the food industry, in a Quality or Food Safety role, in a decision-making capacity
Stakeholder experience	Minimum 5 years' experience in technical or assessment function in any of the following: Accreditation Body, Certification Body, CPO, PRB;

	other as approved by GFSI; or a combination of the above, related to ISO/IEC 17024 standard
Training - Initial	Two (2) day training on the Benchmarking requirements and processes prior to any assessment work being conducted
Training - Ongoing	Attend two (2) calibration training sessions each year; these are typically one session remotely and one face to face in Paris; completion and return of any assigned pre-session activities
Continued Professional Development (CPD)	The BL shall maintain an appropriate level of knowledge, experience, and skill to perform the tasks and services assigned
Insurance (professional indemnity or country equivalent)	The BL shall maintain insurance during the period contracted to GFSI and for a period after (as applicable for country of resident and countries worked in for GFSI)
Contract agreement	Between CGF/CFSI and the Benchmark Leader – signed
Contract – appendix 3	Completed and signed copy of appendix 3 of the contract agreement “Declaration of No Conflict of Interest”
Stakeholder feedback	Feedback received from key stakeholders including GFSI, PRBs etc. will form part of the annual evaluation process

Table 4: responsibilities and requirements for GFSI Benchmark leaders for PRBs



Appendix 1: Feature 1 of the Race to the Top

3.9. In March 2020, the Global Food Safety Initiative (GFSI) announced an ambitious programme of modernisation of GFSI named 'The Race to the Top' (RTTT).

3.10. The RTTT is intended to address the specific challenges GFSI has been facing in relation to trust and confidence in GFSI certification outcomes. Such challenges stemmed from the numerous food safety crises the world has seen in the headlines, eroding consumers' trust in the safety of the food they buy, the brands they love and even the food industry at large.

3.11. Following this announcement, GFSI initiated the development of four specific features, shaped with the support of our Stakeholders, to address the aforementioned challenges:

- Feature 1: Developing harmonisation and benchmarking requirements for providers of food safety auditor training and on-going Continuing Professional Development (CPD).
- Feature 2: Moving to deliver a process of on-going assessment and continuous alignment to the GFSI requirements for CPOs.
- Feature 3: Developing a collaborative approach to the management of Certification Bodies between CPOs, Accreditation Bodies and GFSI.
- Feature 4: Developing a certificate platform - enabling access to certificate data of all FBOs certified to a GFSI-recognised Programme.

3.12. Since March 2020, and the definition of the RTTT framework, GFSI, supported by our entire community, our Steering Committee members, and our CGF Board sponsors, has worked tirelessly to deliver these 4 features.

3.13. The consultation presented to you in the present document represents the last step in the delivery of feature 1 before its implementation is initiated (see figure 1).

Figure 1: the journey from ideation to implementation



3.14. Feature 1 introduces a new approach on the qualification of food safety auditors (see figure 2). It aims at facilitating entry into the profession of auditing through:

- 4 A mutualisation of auditor qualification efforts against the GFSI's current Requirements to reduce redundancies and burden.
- 4 A focus on competence (knowledge, skills and behaviours) to allow candidates to come into the profession with equivalent competence gained through different career paths.

A close-up, low-angle shot of a hand reaching out from the upper right corner towards a field of grain. The scene is bathed in the warm, golden light of a setting or rising sun, which is visible as a bright, hazy glow in the background. The grain stalks in the foreground are silhouetted against the bright light, creating a sense of depth and texture. The overall mood is peaceful and grateful.

Thank you