

GFSI Summary of the Stakeholder Consultation on Technical Equivalence

April 2022

BACKGROUND

GFSI is globally renowned as a benchmarking organisation for private food safety certification programmes. Since 2014, GFSI has also administered a much more modest programme of assessment for public food safety certification standards, called Technical Equivalence (TE). Since its launch, TE has gained interest from a few eligible organisations. Technical Equivalence has raised concerns across many GFSI stakeholders disproportionate to its impact on GFSI's purpose of safe food for people everywhere. In 2020, GFSI therefore decided that a strategic review of TE was required to redefine its place within GFSI's activities, and address the aspects of its process, at the root cause of our stakeholders' concerns.

To inform the strategic review, GFSI ran a formal stakeholder survey to identify the aspects of TE that our stakeholders appreciate and those that need to be improved. The survey was opened to all stakeholders in the form of a consultation questionnaire, and this was further supported with a structured series of interviews with those organisations currently acknowledged by GFSI under the TE programme.

The consultation closed on 14th December 2021 and this report summarises the key findings from the consultation.



EXECUTIVE SUMMARY

A total of 40 stakeholders responded in December 2021 to the survey. Respondents included representatives from all key stakeholders of the Technical Equivalence process: Public Standard Owners currently acknowledged or attracted by the GFSI Technical Equivalence process, GFSI-recognised Certification Programme Owners, Certification Bodies, Food Business Operators and Service Providers. Organisations of varying sizes (<10 employees, 10-249 employees and >249 employees) and from across the world (North America, the EU, Asia, South America, Africa and Australia) were represented.

Stakeholders were all in broad agreement that the Technical Equivalence process improves overall food safety. Cited reasons included its foundation in Codex Alimentarius and ISO guidelines and standards, and its robustness and rigour. Acknowledged standard owners also reported the improved status they derived from their association with a GFSI assessment process. Stakeholders expressed how they expected this in turn to improve market access by providing reassurance to buying companies when selecting suppliers. However, they reported that this benefit was limited by the fact that the Technical Equivalence process did not include a review of the standard owner's governance. Because of this, some buying companies turned down certificates from acknowledged standards, and required certification to a fully recognised certification programme.

The most significant challenge reported in this survey was a misunderstanding of the GFSI Technical Equivalence process by FBOs (both suppliers and buying companies), and the confusion it created between GFSI-recognised Certification Programmes and GFSI-acknowledged standards. This had varied consequences on the stakeholders, but all recommended that either more should be done to clearly communicate the differences between the two programmes and promote the benefits of the GFSI Technical Equivalence process, or only one GFSI Benchmarking process for Certification Programmes accessible to both private and public certification programme owners should be run.



SECTION 1: CONSULTATION RESPONSES FROM ALL STAKEHOLDERS (SEE SECTION 2)

a. Stakeholder representation and knowledge of Technical Equivalence

Forty organisations / individuals responded to the online survey, representing a mix of key stakeholders of GFSI and the GFSI Technical Equivalence process (see chart 1). There was a predominance of GFSI-recognised certification programme owners amongst the respondents; FBOs, CBs and service providers to the food industry had similar representation. It is worth noting that five public standard owners were also involved in this consultation through dedicated interviews. Their responses are analysed in Section 2 of this report.

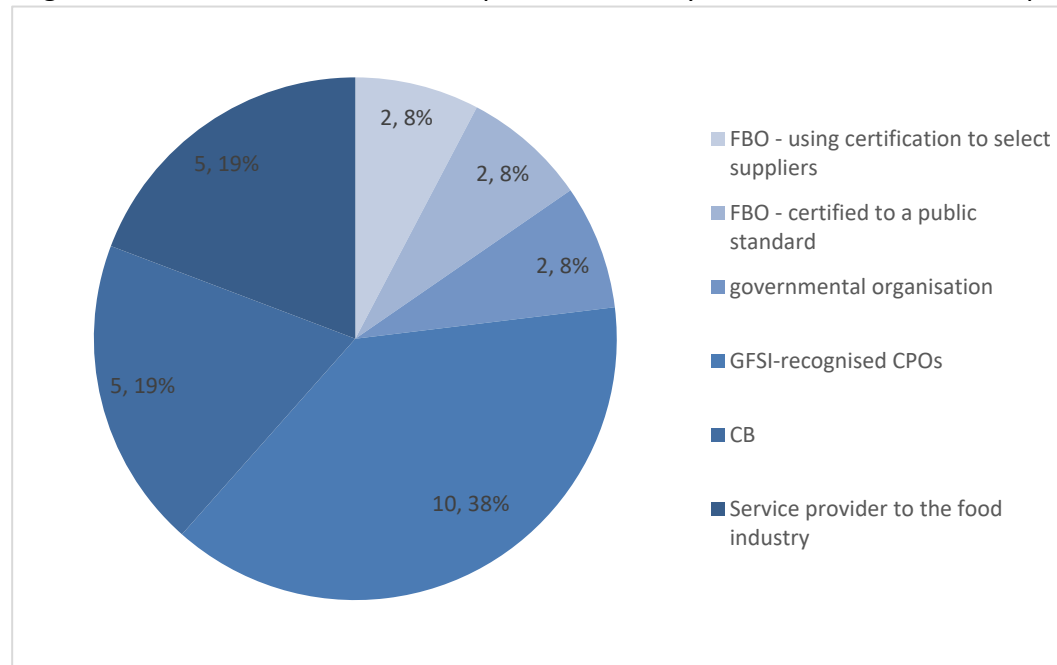


Chart 1: participants to the online survey by stakeholder type

There was a wide geographical distribution in respondents including North America (50%), the EU (19%), Asia (11%), South America (8%),

Australia (4%) and Africa (8%). The size of organisation that the respondents represented included small (<10 employees, 19%), medium (10-249 employees, 50%) and large (>250 employees, 31%) businesses.

The majority of respondents declared being quite or very familiar with the GFSI Technical Equivalence benchmarking process of acknowledging public standards including the benchmarking process itself (85%), the cost of benchmarking (53%), GFSI benchmarking of the public standard (80%) and GFSI benchmarking of the scheme rules applicable to the public standard (75%). Eighty-three percent of respondents were partially or fully aware of the difference between the GFSI Technical Equivalence process for public standards and GFSI recognition (benchmarking process for private certification programmes).

b. Stakeholder views of Technical Equivalence

b.1. Stakeholders were asked to rate a number of statements regarding the Technical Equivalence process (Table 1).

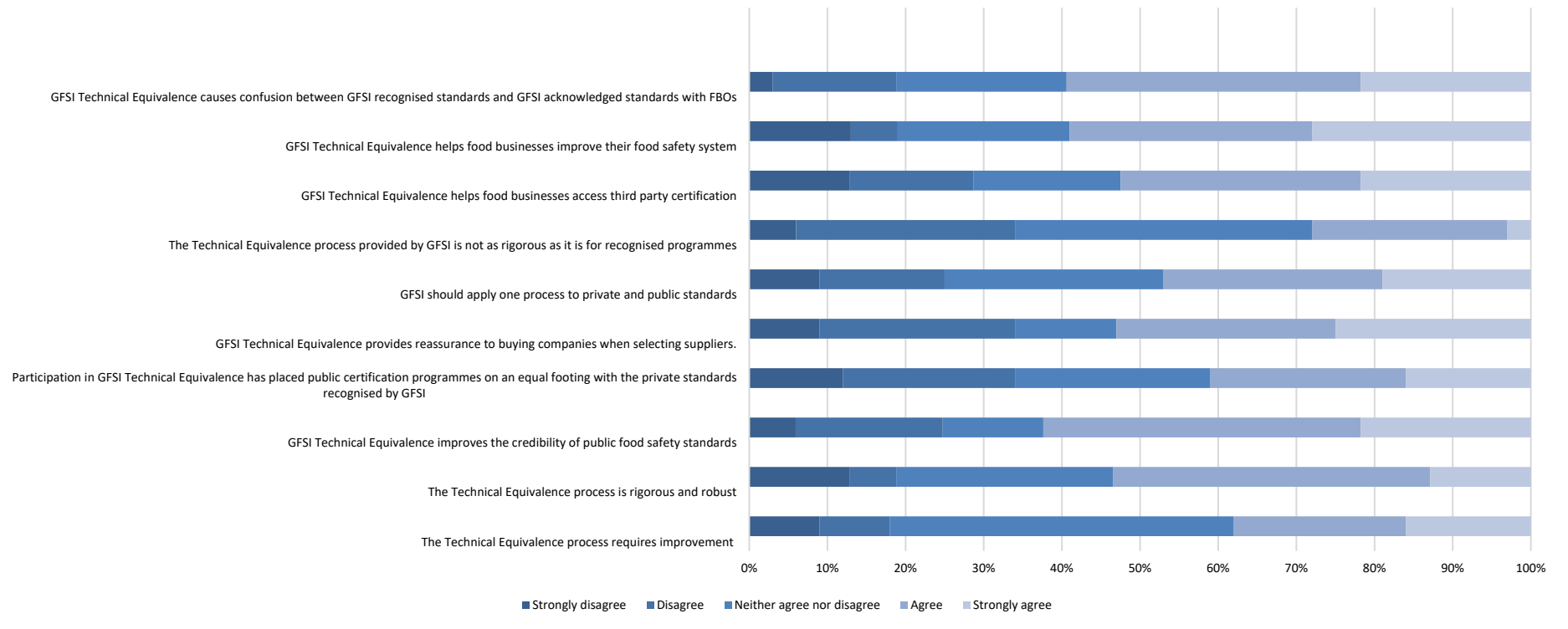
The majority of respondents felt that Technical Equivalence helps food businesses improve their food safety system (59%), that it provides a route to third-party certification for these businesses (53%), and that it provides reassurance to buying companies when selecting suppliers (53%). However, an overwhelming majority (60%) also felt that the current system causes confusion between the GFSI-recognised standards and GFSI-acknowledged standards with FBOs. Because of this, there was no clear consensus on whether or not Technical Equivalence has placed public certification programmes on an equal footing with private standards recognised by GFSI.

50% of respondents called out the confusion between the GFSI processes of Technical Equivalence (for public standards) and Recognition (for private certification programmes), with nearly twice as many respondents (47%) feeling that there should only be one process for private and public standards than those who felt there should not be (25%). When asked to propose solutions to the challenges Technical Equivalence brought to them, some stakeholders suggested that only one GFSI benchmarking programme should exist for all certification programmes, whilst others recommended that GFSI should do more to explain the distinction between the current GFSI Technical Equivalence and Recognition programmes, and the benefits of Technical Equivalence.

Over half (54%) of the respondents felt that the Technical Equivalence process was rigorous and robust with a small minority disagreeing (19%); 44% of respondents later on neither agreed nor disagreed with a need to improve that process, although some stakeholders suggested in the open answers that the Technical Equivalence process should include an assessment of the governance of the standard owners.



Table 1. Stakeholder Review of the Technical Equivalence Process



b.2. Stakeholders were asked to write the best three things about GFSI Technical Equivalence

Four key themes arose recurrently from the stakeholder's responses on the best features of the GFSI Technical Equivalence:

- overall improvement in food safety
- the improved status of public standards arising from acknowledgement by GFSI
- market access for small businesses
- consistency and harmonisation in food safety standards.

Some stakeholders also noted the value of "once certified, accepted everywhere".

b.3. Stakeholders were asked to write the worst three things about GFSI Technical Equivalence

The responses were not as focused as for the previous answer, however, a few recurrent points arose included:

- the view that the Technical Equivalence process was poorly understood in the market,
- that acknowledged standards were not universally accepted by buying companies,
- that there was a perception of the certification of businesses being to a lesser standard than through recognised certification schemes, mainly driven by the lack of GFSI assessment of the governance of the standard owner in the Technical Equivalence process.

There were also concerns about the cost and administrative complexity of the GFSI Technical Equivalence process.



SECTION 2: CONSULTATION RESPONSES FROM STAKEHOLDER ORGANISATIONS CURRENTLY ACKNOWLEDGED UNDER THE TECHNICAL EQUIVALENCE PROGRAMME

Three organisations who currently have GFSI-acknowledged public standards together with two further organisations who have requested acknowledgement were interviewed to gain their views of the current process and future needs.

a. Reasons for applying for Technical Equivalence and benefits of acknowledgement

The overwhelming reason for applying for Technical Equivalence was to improve market access for both the standard and businesses certified to the public standard. Other reasons included creating fairness and a level playing field regarding food safety management system requirements, avoiding duplication of certification requirements for businesses together with global recognition of the standard. This latter point was also seen as a key potential benefit in that specifiers across the globe would recognise and accept the public standard. Other benefits stated by most respondents included increased confidence in alignment / equivalence of the public standard to the GFSI Benchmarking Requirements and therefore to GFSI-recognised private standards, thereby enabling the principle of once certificate recognised everywhere. Increased credibility and therefore greater engagement of food businesses with the public standard was also cited as a benefit.

b. The three best things about Technical Equivalence

The main areas identified were similar to the points cited as the reason for applying for Technical Equivalence and the perceived benefits, namely market access, alignment with private standards and international awareness / recognition / acceptance. Other points noted included driving improvement in food safety standards and the rigour of the GFSI Technical Equivalence process.

c. The three worst things about Technical Equivalence

The overwhelming theme identified by the respondents was the lack of market acceptance of the public standards acknowledged as part of Technical Equivalence with a strong view that such standards were felt to be considered by the market as being of a lesser standard than GFSI-recognised private certification programmes. Additional areas of concern included the perceived lack of auditor competency assessment, the burden on the regulator to change the public standard to meet the GFSI Technical Equivalence Requirements, the lack of promotion of the benefits of Technical Equivalence by GFSI.



d. Problems experienced with the process and possible solutions

Respondents raised a number of challenges from their experience in engaging with the Technical Equivalence process including the lack of any forum to allow the public standard owner to discuss / review the GFSI Technical Equivalence Requirements, frustration regarding not being able to reference GFSI on certificates and difficulty in sourcing supporting information for the process although it was also noted that Technical Equivalence was a “fair” process. Solutions included providing a forum for engaging with public standard owners, better communication of the Technical Equivalence process in the wider market, creating a single benchmark and ‘recognition’ process across public and private certification programmes.

e. Public standard owners’ views of Technical Equivalence

Three public standard owners currently acknowledged as part of Technical Equivalence were asked to rate a number of questions in relation to the process (Table 2). The key points arising included a universal view that GFSI was the key driver in deciding to progress Technical Equivalence, that the assessment process is rigorous and robust but that Technical Equivalence had not put the public standard on an equal footing with private standards recognised by GFSI. Two of the three respondents agreed that the assessment process was easy to understand although one disagreed and similarly two did not feel that the process needed improvement whereas one did. Only one respondent felt that Technical Equivalence had improved take up of the standard by FBOs although none of the respondents disagreed.



Table 2. Public Standard Owner Review of the Technical Equivalence Process

