

GFSI Assessment Report



Application information

Assessment team and date

Certification programme / Standard* Name(s)	Equitable Food Initiative Food Safety Standards, Guidance, & Interpretations Version 2.0, November 30th, 2018
Certification programme / Standard* owner name and address	Equitable Food Initiative 1875 Connecticut Ave NW 10 th Floor Washington, DC 20009 USA
Certification programme / Standard* owner name, email, contact number	Equitable Food Initiative Food Safety Standards, Guidance, & Interpretations Version 2.0, November 30th, 2018 / Kcook@equitablefood.org
Date of previous application if application	NA
Benchmark Leader name and contact details	Chris Kelly
GFSI Technical Manager name	Marie-Claude Quentin
Observer's name	NA
Interpreter's name (if applicable)	NA
Date of this office assessment	April 19 – 20, 2022
Language (e.g., English, or other)	English

* Cross as appropriate

Scopes including in this application

GFSI Scopes		Scopes applied For
AI	Farming of Animals for Meat/ Milk/ Eggs/ Honey	
AII	Farming of Fish and Seafood	
BI	Farming of Plants (other than grains and pulses)	*
BII	Farming of Grains and Pulses	*
BIII	Pre-process Handling of plant products	
CO	Animal Conversion	
CI	Processing of perishable animal products	
CII	Processing of Plant Perishable Products	
CIII	Processing of Animal and Plant Perishable Products (Mixed Products)	
CIV	Processing of Ambient Stable Products	
D	Production of Feed	
E	Catering	
FI	Retail / Wholesale	
FII	Food Broker / Agent	

H	Provision of Food Safety Services	
G	Provision of Storage and Distribution Services	
I	Production of Food Packaging	
JI	Hygienic Design of Food Buildings and Processing Equipment (for building constructors and equipment manufacturers)	
JII	Hygienic Design of Food Buildings and Processing Equipment (for building and equipment users)	
K	Production of (Bio) Chemicals (Additives, Vitamins, Minerals, Bio-cultures, Flavourings, Enzymes and Processing aids)	

EXECUTIVE SUMMARY AND RECOMMENDATION TO THE BOARD

Executive summary

Equitable Food Initiatives the CPO of an agriculturally-based Standard for administration and management using two certification bodies that are accredited to ISO 17065. The Standard describes the necessary process required for safe agriculture products used for human consumption. A review of the program, the records provided by certification bodies on clients, the competency of the certification body auditors, and the certification process have provided objective evidence to support the validity and accuracy of the program and the ability of the certification bodies retained by the CPO to effectively implement, manage and maintain clients in the Equitable Food Initiative Food Safety Standards, Guidance, & Interpretations Version 2.0, November 30th, 2018.

- ▶ EFI has active certificates currently issued through two certification bodies in multiple countries.
- ▶ Founded in 2008, EFI was created by leaders in the supply to increase assurance in the areas of worker safety and food safety by bringing greater transparency to the supply chain by working with farmers workers, growers, and retailers.
- ▶ governance: EFI has a diverse group of board members and staff with a goal of transforming the agriculture supply chain.
- ▶ Information in this report is based on a one-day desk review and two-day onsite review.

Recommendation to the GFSI Board

TBC

RESULTS OF ASSESSMENT AND OFFICE VISIT

Time and location details

	Location	People present GFSI, consultant, CPO. Names and roles	Date and time
Self-assessment review	Remote	Consultant BL - Chris Kelly, CPO – Karla Cook – Certification Manager, Kenton Harmer – Managing Director, Gillian Kelleher – EFI Food Safety Consultant	March 23, 2022
Review calls	NA	Marie- Claude Quinten – GFSI, Consultant BL - Chris Kelly, CPO – Karla Cook – Certification Manager, Kenton Harmer – Managing Director, Gillian Kelleher – EFI Food Safety Consultant	January 25, 2022; February 23, 2022; March 1, 2022, March, June 2, 2022
Office visit	Remote	Consultant BL - Chris Kelly, CPO – Karla Cook – Certification Manager, Kenton Harmer – Managing Director, Gillian Kelleher – EFI Food Safety Consultant	April 19 – 20, 2022

Overview

- ▶ EFI has active certificates currently issued through two certification bodies in multiple countries.
- ▶ Founded in 2008, EFI was created by leaders in the supply to increase assurance in the areas of worker safety and food safety by bringing greater transparency to the supply chain by working with farmers workers, growers, and retailers.
- ▶ governance: EFI has a diverse group of board members and staff with a goal of transforming the agriculture supply chain.
- ▶ Information in this report is based on a one-day desk review and two-day onsite review.
- number of certificates, CBs, countries in which they operate
- ▶ background and history of the CPO: country, team.
- ▶ governance: stakeholders, board.


General compliance, strengths and weaknesses

- The program is in line with the GFSI requirements.
- The findings were in the area of clarification of the scope and having access to documentation to support the stakeholders and technical expert's credentials.
- The program has history in the industry with full knowledge of success criteria. The existing team is fully competent and cohesive.
- Ensuring that evidence is documented in areas where the due diligence has been done but not recorded.

Changes made to the certification programme / Standard* following the GFSI assessment

- The CPO corrected the information in the **Equitable Food Initiative Food Safety Standards, Guidance, & Interpretations Version 2.0, November 30th, 2018**.
- The CPO implemented corrective actions for all observations made during the desk and onsite review processes.

List of findings

element number	Non-conformity	Compliant Yes/no/partly	EFI Evidence - Corrective	Supportive Evidence Reference	Recommendation from Benchmark leader	Decision from GFSI technical manager															
1.12	The agendas are not available for review during the desk review.	partly	<div><div>Standards Committee Meeting</div><div>Virtual Meeting</div></div> <p>Thursday, November 19, 2020 10:30am to 12:30pm PST</p> <p>Key objectives:</p> <ul style="list-style-type: none">• Discuss COVID-19 alternative auditing• Approve GFSI-related certification requirements and summary document <table><tr><th>Time</th><th>Content</th><th>Who Leads</th></tr><tr><td>10:30</td><td>Welcome, Agenda for today</td><td>Jagoda/Kenton</td></tr><tr><td>10:35</td><td>COVID-19 Alternative Auditing<ul style="list-style-type: none">• Describe current situation and immediate response including no in-person audits for time being• What threshold before can go back to in-person audits?• Need to refresh protocols?</td><td>Kenton</td></tr><tr><td>11:20</td><td>GFSI Working Group recommendations—in plenary<ul style="list-style-type: none">• Present recommendations and rationale• Respond to clarifying questions• ID burning issues if any</td><td>WG lead</td></tr><tr><td>12:30</td><td>Meeting ends</td><td></td></tr></table>	Time	Content	Who Leads	10:30	Welcome, Agenda for today	Jagoda/Kenton	10:35	COVID-19 Alternative Auditing <ul style="list-style-type: none">• Describe current situation and immediate response including no in-person audits for time being• What threshold before can go back to in-person audits?• Need to refresh protocols?	Kenton	11:20	GFSI Working Group recommendations—in plenary <ul style="list-style-type: none">• Present recommendations and rationale• Respond to clarifying questions• ID burning issues if any	WG lead	12:30	Meeting ends		Agendas to review: EFI Standards Committee Mar 17&18 2020 Facil Agenda FINAL Agenda Day 1 - Standards Committee Meeting - Nov 13th 2020 Agenda Day 2 - Standards Committee Meeting - Nov 19th 2020 (example shown)	Corrective action is sufficient to close the NC.	
Time	Content	Who Leads																			
10:30	Welcome, Agenda for today	Jagoda/Kenton																			
10:35	COVID-19 Alternative Auditing <ul style="list-style-type: none">• Describe current situation and immediate response including no in-person audits for time being• What threshold before can go back to in-person audits?• Need to refresh protocols?	Kenton																			
11:20	GFSI Working Group recommendations—in plenary <ul style="list-style-type: none">• Present recommendations and rationale• Respond to clarifying questions• ID burning issues if any	WG lead																			
12:30	Meeting ends																				

1.15	<p>Clause 5 contains language for reviews and revisions.</p> <p>However it does not specify revisions based on changes to GFSI.</p>	partly	<p>5 Revisions of Key Certification Program Documents</p> <p>A formal internal review is conducted annually by Equitable Food Initiative (EFI) SC to assess the management of the certification program and address any issues or concerns raised by stakeholders; the review enables continuous improvement of the certification program an ongoing compliance with GFSI benchmarking requirements. All issues or concerns brought to the Standards Committee's attention are documented along with the date reported and who is responsible for following up. The items are discussed, and action steps determined. Actions taken and date of close out are included in the minutes of the Standards Committee Meeting. Required revisions will be noted in any new documents that are published along with requirements for when the changes are to take effect. EFI will inform all key stakeholders, including GFSI, of the revisions and changes to the Certification Program, in particular those changes that are relevant to the GFSI recognition status of the Certification Program.</p>	<p>Certification Program Revision Policy v1.2 Clause 5</p>	<p>Corrective action is sufficient to close the NC.</p>
------	--	--------	--	--	---

1.16	Clause 7 contains communication information between the CB the grower and EFI. However, it does not contain communication by the CPO of information to other key stakeholders	partly	5 Revisions of Key Certification Program Documents A formal internal review is conducted annually by Equitable Food Initiative (EFI) SC to assess the management of the certification program and address any issues or concerns raised by stakeholders; the review enables continuous improvement of the certification program an ongoing compliance with GFSI benchmarking requirements. All issues or concerns brought to the Standards Committee's attention are documented along with the date reported and who is responsible for following up. The items are discussed, and action steps determined. Actions taken and date of close out are included in the minutes of the Standards Committee Meeting. Required revisions will be noted in any new documents that are published along with requirements for when the changes are to take effect. EFI will inform all key stakeholders, including GFSI, of the revisions and changes to the Certification Program, in particular those changes that are relevant to the GFSI recognition status of the Certification Program.	Certification Program Revision Policy v1.2 Clause 5	Corrective action is sufficient to close the NC.
------	--	--------	---	---	--

1.23

The review of the Scheme Committee Facilitator Agenda for November 15 and 16 was reviewed. The document contained the attendees, items reviewed, and the workplan. **However, it is difficult to determine if the document is for Q4 2014 - 2015 or if it is more recent.** The document does show issues, actions, and items that are in progress or completed.

partly



Standards Committee Meeting
Virtual Meeting

Thursday, November 19, 2020 10:30am to 12:30pm PST

Key objectives:

- Discuss COVID-19 alternative auditing
- Approve GFSI-related certification requirements and summary document

Time	Content	Who Leads
10:30	Welcome, Agenda for today	Jagoda/Kenton
10:35	COVID-19 Alternative Auditing <ul style="list-style-type: none"> • Describe current situation and immediate response including no in-person audits for time being • What threshold before can go back to in-person audits? • Need to refresh protocols? 	Kenton
11:20	GFSI Working Group recommendations—in plenary <ul style="list-style-type: none"> • Present recommendations and rationale • Respond to clarifying questions • ID burning issues if any 	WG lead
12:30	Meeting ends	


Activities and outcomes of the EFI Certification Program are monitored closely through the multistakeholder EFI Standards Committee as well as through a Board review twice a year. Binding strategic and operational direction is provided and validation of implementation provided during subsequent meetings. latest Standards Committee Agendas to review: EFI Standards Committee Mar 17&18 2020 Facil Agenda FINAL

Corrective action is sufficient to close the NC.

				Agenda Day 1 - Standards Committee Meeting - Nov 13th 2020 Agenda Day 2 - Standards Committee Meeting - Nov 19th 2020 (shown as example)		
			-			

--	--	--

--	--	--

1.25	<p>The minutes were reviewed from November 15-16, 2016 and include the list of attendees, and elements discussed.</p> <p>However, the information is five + years old and do not reflect an annual internal audit or review.</p>	partly	<div><div></div><div><div>Standards Committee Meeting</div><div>Virtual Meeting</div></div><div>Thursday, November 19, 2020 10:30am to 12:30pm PST</div><div>Key objectives:</div><div><ul style="list-style-type: none">• Discuss COVID-19 alternative auditing• Approve GFSI-related certification requirements and summary document</div><table><tr><th>Time</th><th>Content</th><th>Who Leads</th></tr><tr><td>10:30</td><td>Welcome, Agenda for today</td><td>Jagoda/Kenton</td></tr><tr><td>10:35</td><td>COVID-19 Alternative Auditing<ul style="list-style-type: none">• Describe current situation and immediate response including no in-person audits for time being• What threshold before can go back to in-person audits?• Need to refresh protocols?</td><td>Kenton</td></tr><tr><td>11:20</td><td>GFSI Working Group recommendations—in plenary<ul style="list-style-type: none">• Present recommendations and rationale• Respond to clarifying questions• ID burning issues if any</td><td>WG lead</td></tr><tr><td>12:30</td><td>Meeting ends</td><td></td></tr></table></div> <div><div>Standard Committee Agendas: Minutes are taken and distributed for Standards Committee and Board meetings</div><div>to reflect the situation and a of event to</div><div>ing and US ment. to</div><div>lay 1 - s e - Nov 3 Agenda standards</div><div>Committee Meeting - Nov 19th 2020 FINAL</div></div> <div><div>Corrective action is sufficient to close the NC.</div></div>	Time	Content	Who Leads	10:30	Welcome, Agenda for today	Jagoda/Kenton	10:35	COVID-19 Alternative Auditing <ul style="list-style-type: none">• Describe current situation and immediate response including no in-person audits for time being• What threshold before can go back to in-person audits?• Need to refresh protocols?	Kenton	11:20	GFSI Working Group recommendations—in plenary <ul style="list-style-type: none">• Present recommendations and rationale• Respond to clarifying questions• ID burning issues if any	WG lead	12:30	Meeting ends	
Time	Content	Who Leads																
10:30	Welcome, Agenda for today	Jagoda/Kenton																
10:35	COVID-19 Alternative Auditing <ul style="list-style-type: none">• Describe current situation and immediate response including no in-person audits for time being• What threshold before can go back to in-person audits?• Need to refresh protocols?	Kenton																
11:20	GFSI Working Group recommendations—in plenary <ul style="list-style-type: none">• Present recommendations and rationale• Respond to clarifying questions• ID burning issues if any	WG lead																
12:30	Meeting ends																	

2.17	The contracts used as objective evidence do not contain language for the requirement of accreditation within 12 months of the date of application in section 8b.	partly	2 General Requirements 2.1.2 A CB providing technical auditing services to the EFI Food Safety and Pest Management Standards shall apply for and, within twelve months, obtain accreditation by EFI's AB before starting to sell certification services. If accreditation is not likely to be obtained within 12 months, the CB shall provide EFI a plan to achieve accreditation in the fastest possible manner. If the plan is not approved and implemented, the CB agreement shall be terminated.	Certification Program Requirements v3.0 Part A, Section 2, 2.1.2	Corrective action is sufficient to close the NC.	
------	---	--------	---	--	--	--

2.18	The contracts used as objective evidence include termination for any cause by any party in section 8c. However it does not discuss the concern of 12 months.	partly	<p>8. TERM & TERMINATIONC. EFI Termination. Either party may terminate this Agreement for any reason or no reason by giving 60 days' written notice to the other party. EFI may terminate this Agreement immediately upon notice if such instance cannot be cured or, if applicable, Certifying Body does not cure such instance within 30 days after receiving such notice, (i) in the case of misconduct by Certifying Body or any of its personnel performing the Audit and Certification Services; (ii) if Certifying Body has not complied with the applicable requirements or obligations contemplated by the EFI Certification Requirements, EFI Certification Program Summary, or Third Party Requirements; (i ii) if Certifying Body ceases to hold approval or accreditation, if accreditation is required; (iv) if Certifying Body fails to maintain the insurance required by this Agreement; (v) if EFI becomes aware that Certifying Body is using personnel to perform the Audit and Certification Services that do not comply with the requirements for auditors set out in the EFI Certification Program, or that have otherwise been found to have a conflict of interest.</p>	CB Agreement Clause "CB Agreements Clause 8C:1) NSF Certifying Body Agreement 2) SCS Final -Amended & Restated EFI Certifying Body Agreement	Corrective action is sufficient to close the NC.
------	---	--------	--	--	--

2.20	The CPO does not have a program in place for notification of range of accreditation.	No	2 General Requirements. 2.1 Accreditation. 2.1.2 A CB providing technical auditing services to the EFI Food Safety and Pest Management Standards shall apply for and, within twelve months, obtain accreditation by EFI's AB before starting to sell certification services. If accreditation is not likely to be obtained withing 12 months, the CB shall provide EFI a plan to achieve accreditation in the fastest possible manner. If the plan is not approved and implemented, the CB agreement shall be terminated.	Certification Program Requirements v3.0 - Part A - Section 2, 2.2.1.2.	Corrective action is sufficient to close the NC.	
2.21	The CPO does not have a program in place for notification of range of accreditation.	No	2 General Requirements. 2.1 Accreditation. 2.1.2 A CB providing technical auditing services to the EFI Food Safety and Pest Management Standards shall apply for and, within twelve months, obtain accreditation by EFI's AB before starting to sell certification services. If accreditation is not likely to be obtained withing 12 months, the CB shall provide EFI a plan to achieve accreditation in the fastest possible manner. If the plan is not approved and implemented, the CB agreement shall be terminated.	Certification Program Requirements v3.0 - Part A - Section 2, 2.2.1.2.	Corrective action is sufficient to close the NC.	

3.13	<p>There is a process for a risk based approach in the EFI QMS v1.0 document. There is evidence of follow up with CB's on metrics. However, the CB has listed this as partly. Request the additional information from the CB.</p>	partly	<p>QMS v1.0 Feedback sessions with CB's conducted twice a year. Virtual Office Visits conducted for both accredited CB's on May 17th and 18th, 2022</p>	<p>QMS v1.0 Feedback sessions with CB's conducted twice a year. Virtual Office Visits conducted for both accredited CB's</p>	<p>Corrective action is sufficient to close the NC.</p>	
------	--	--------	---	--	---	--

4.6.1	<p>No evidence has been provided for assessment. Request explanation of on the CPO's answer of "No".</p>	no	<p>Part B Section 12.11.5. The CB shall operate an effective and fully implemented quality system. The system shall be documented and used by all relevant CB personnel. There shall be a designated employee responsible for the quality system's development, implementation, and maintenance. The designated employee shall have a reporting role to the CB's executives and shall also have the responsibility for reporting on the performance of the quality management system for the purposes of management review and subsequent system improvement. If an Information Communication Telephone (ICT) is used to assess auditor behavior, the system shall be operated in accordance with MD4: 2022 by the International Accreditation Foundation</p>	<p>Certification Program Requirements v3.0 (Draft) Part B, Section 12.11.5</p>	<p>Corrective action is sufficient to close the NC.</p>	
-------	---	----	---	--	---	--

4.10	<p>The review of clause 2D in the agreements and section 12 of the Auditor Competency and Onboarding define the requirements of initial auditors. However the use of "Support Auditor" can be construed as something other than that individual being witnessed.</p>	partly	<p>2. AUDIT AND CERTIFICATION SERVICES. <u>D Performance of Audit and Certification Services;</u> Approved Auditors. Certifying Body shall perform the Audit and Certification Services (i) in a timely, competent, professional and workmanlike manner, in accordance with all applicable industry standards; and (ii) only using Approved Auditors. "Approved Auditors" means those individual employees and individual independent contractors of Certifying Body that (a) satisfy the requirements and qualifications prescribed for auditors in the EFI Certification Requirements, EFI Certification Program Summary, and Third Party Requirements; (b) have been approved in advance by EFI in writing; and (c) have satisfied any training and competency requirements set by EFI (which, for the avoidance of doubt, may require Certifying Body to pay fees for training). Certifying Body will be responsible for all acts and omissions of its Approved Auditors in connection with the performance of the Audit and Certification Services and this Agreement.</p>	<p>CB Agreements Clause 2D:1) NSF Certifying Body Agreement 2) SCS Final -Amended & Restated EFI Certifying Body Agreement</p>	<p>Corrective action is sufficient to close the NC.</p>
------	---	--------	---	---	---

4.14	The review of section 13.1 has a requirement of "at least three onsite EFI audits each calendar year versus the requirement of at least five stated here.	partly	12 Lead Auditor 12.1 The auditor shall provide EFI with documentation showing that they served as a Support Auditor on a minimum of three audits.	Auditor Competency & Onboarding v2.1 (Draft) , Section 12.1	Corrective action is sufficient to close the NC.	
4.15	The review of clause 3.3.2 contains compliance contains a minimum number of verifiable days (30). However is does not define the number of onsite audits needed.	partly	3 Auditor Experience. 3.3.2 A minimum of 5 on-site audits and 30 verifiable on-site audit days auditing to GFSI-recognized food safety standards.	Auditor Competency & Onboarding v2.1 : Section 3.3.2	Corrective action is sufficient to close the NC.	

4.16	The review of the supportive evidence shows the information to be included. However it does not define the method or the location of where the information is the maintained.	partly	Auditor Register File - Excel File	Auditor Register File - Excel File now available in Box	Corrective action is sufficient to close the NC.	
5.6	Section 2.10.3 and 2.10.4 cover the language for unannounced audits. However, it does not define the frequency of the unannounced audit per the requirement.	partly	2.10 Notice of Audit 2.10.3 The second verification audit within each certification cycle shall be unannounced.	Certification Program Summary v2.1 - Section 2.10.3	Corrective action is sufficient to close the NC.	

5.8	<p>The review of section 12.5 in Part B states that "the CB shall calculate the overall duration of its audits using the requirements below".</p> <p>However, the requirements do not link an activity with a pre-supposed timeline. It does state in clause 12.5.2 that the duration can be increased and justification must be provided if the increase is greater than 25%.</p>	partly	<p>12.5.2 The CB shall allow for a minimum of six person-days to conduct initial or recertification audits. Exceptions to this require the prior written consent of EFI. Verification audits are expected to require four person-days but will vary based on the number of nonconformances found in the current certification cycle. Exceptions more than 1 person-day greater or less than four require the prior written consent of EFI.</p>	<p>Certification Program Requirements v3.0 - Part B Section 12.5.2</p>	<p>Corrective action is sufficient to close the NC.</p>	
-----	---	--------	---	--	---	--

5.31	<p>The sections referenced as evidence outline audit requirements. However, there is not clarity on the requirement for part of the audit being conduct onsite in those clauses.</p>	partly	<p>12.5 On-Site Audit Duration</p> <p>12.5.1 The CB shall calculate the overall duration of its audits using the requirements below, and this shall be the minimum duration of the audit.</p> <p>12.5.2 The CB shall allow for a minimum of six person-days to conduct initial or recertification audits. Exceptions to this require the prior written consent of EFI. Verification audits are expected to require four person-days but will vary based on the number of nonconformances found in the current certification cycle. Exceptions more than 1 person-day greater or less than four require the prior written consent of EFI.</p> <p>12.5.3 The CB shall plan time for an opening and closing meetings which include representatives of the Leadership Team and periodic auditors' caucus meetings.</p> <p>12.5.4 Where translators are used, the CB shall double audit times for those sections of the audit where translators are necessary.</p> <p>12.5.5 The CB may increase the audit duration and, if the increase is greater than 25% of the time calculated below, CB shall justify this increase in the audit report.</p> <p>12.5.6 The CB shall strive to interview the entire Leadership Team (including members in management roles). Where that is not possible, the CB shall interview no less than 70% of the Leadership Team.</p>	<p>Certification Program Requirements v3.0 - Part B Section 12.5</p>	<p>Corrective action is sufficient to close the NC.</p>
------	---	--------	---	--	---

		<p>12.5.6.1 The Leadership Team shall be interviewed as a group using a focus group technique, with a minimum length of the focus group of 60 minutes' duration. Individual Leadership Team members may then be interviewed separately to gather further information as needed.</p> <p>12.5.6.2 During unannounced audits, farmworker and Leadership Team interviews shall be completed within five business days of the first day of the audit.</p> <p>12.5.7 The CB shall coordinate with the grower ahead of time to:</p> <p>12.5.7.1 Receive a completed Declaration of Audit Readiness and follow the recommendations it contains from the Leadership Team related to a designated time and location for interviews that is conveniently accessible for the Leadership Team and farmworkers and which allows them to speak freely. In the case of an unannounced audit, interviews can be delayed to a mutually agreeable time where necessary.</p> <p>12.5.7.2 Receive and follow the recommendation from the Leadership Team for the optimal time of day for farmworker interviews to be scheduled.</p> <p>12.5.7.3 The CB shall segment the farmworker population into three groups:</p> <p>12.5.7.3.1 Those applying or controlling the application of crop protection materials;</p> <p>12.5.7.3.2 Workers involved in production and harvest; and</p>		
--	--	--	--	--

		<p>12.5.7.3.3 Workers involved in post-harvest activities such as packing and transport.</p> <p>12.5.8 The CB shall calculate sample sizes for document review for each of the three populations using Table B1.</p> <p>12.5.9 The CB shall calculate sample sizes for farmworker interviews for each of the three populations using Table B1.</p>			
--	--	--	--	--	--

5.34	The review of section 12.5 contains information on the audit activities. However it does not define a timeline not to exceed 30 days.	partly	12.5.12 All onsite and desk-based audit activities shall not exceed 30 days. If audit activities cannot be completed within 30 days, the CB shall request an extension in writing from EFI that includes justification. Should EFI grant an extension, in no case shall the audit activity period be more than 90 days.	Certification Program Requirements v3.0 - Part B Section 12.5.12	Corrective action is sufficient to close the NC.	
5.34.1	The review of section 12.5 contains information on the audit activities. However it does not define a timeline not to exceed 30 days. The clause does not include a maximum time for extension and a risk assessment being conducted	partly	12.5.12 All onsite and desk-based audit activities shall not exceed 30 days. If audit activities cannot be completed within 30 days, the CB shall request an extension in writing from EFI that includes justification. Should EFI grant an extension, in no case shall the audit activity period be more than 90 days.	Certification Program Requirements v3.0 - Part B Section 12.5.12	Corrective action is sufficient to close the NC.	

	to justify the extension.					
--	---------------------------	--	--	--	--	--

HACCP 1.1	<p>Reviewed sections AR1.2, 2.1, which reference food safety, and AM 1.1 that references allergen management. The sections identified in the standard contain a statement of description for compliance and criteria that defines acceptable objective evidence. However, while AM 1.1 include cross contamination, it does not address cross contact.</p>	partly	<p>Indicator AM 1.1. The allergen management program shall include a risk assessment of products, inputs, processing aids, and other sources of allergens (e.g. outside contamination such as personnel lunches) and how identified allergen risks are controlled to prevent allergen cross-contact in the food safety plan. Farmworkers are trained in proper handling of allergens. A document review shall verify that procedures and responsibilities used to control allergens are documented and implemented.</p> <p>Guidance and Interpretation A document review shall verify that farmworkers have been trained in proper handling of allergens and how to prevent cross-contact.</p>	Food Safety Standards Guidance and Interpretations v3.0 - AM 1.1	Corrective action is sufficient to close the NC.
--------------	---	--------	--	--	--

HACCP 1.2	<p>The review of section AR 2.1 defines the scope to include the areas of all operations, all products, and / or all product groupings.</p> <p>However the requirement does not clearly identify the requirement of per process or production step.</p>	partly	<p>Indicator AR 2.1</p> <p>The HACCP-based food safety plan identifies and assesses all locations of the operation and all products and/or product groupings covered by the plan. The plan assesses the likely physical, chemical, and biological hazards and contaminants at each step of the process and for each product category and the procedures to control those hazards, including monitoring, verification, corrective actions, and recordkeeping, for the following areas: water, soil amendments, environmental assessments, animals, harvest and post-harvest, and worker sanitation. The food safety plan includes Standard Operating Procedures (SOPs) and other relevant work instructions appropriate to controlling the identified hazards.</p> <p>Guidance and Interpretation.</p> <p>A review of the HACCP-based written food safety plan shall verify that it:</p> <ol style="list-style-type: none"> 1. Identifies and assesses all locations of the operation and all products and/or product groupings covered by the plan; 2. Assesses likely physical, chemical, and biological hazard at each step of the process and for each product category; 3. Sets out procedures to control those hazards, including: <ol style="list-style-type: none"> a. Monitoring, b. Verification, 	Food Safety Standards Guidance and Interpretations v3.0 - Indicator AR 2.1	Corrective action is sufficient to close the NC.
-----------	--	--------	--	--	--

			<div><div><div>c. Corrective actions, and</div><div>d. Recordkeeping;</div></div><div>4. Covers the following areas:<div><div>a. Water,</div><div>b. Soil amendments,</div><div>c. Environmental assessments,</div><div>d. Animals,</div><div>e. Harvest and Post-harvest, and</div><div>f. Worker sanitation;</div></div></div><div>5. Identifies regulatory food safety requirements and details a commitment and processes for remaining in compliance with those requirements;</div><div>6. Includes SOPs and other relevant work instructions appropriate to controlling the identified hazards and ensuring regulatory compliance; and</div><div>7. Includes customer requirements that may exceed the above requirements that must also be met.</div></div>			
--	--	--	--	--	--	--

FSM 1	<p>The review of AR 1.1 and AR 3.1 shows compliance to the requirement for identification of responsibilities, and job functions.</p> <p>However the requirement and guidance do not discuss or set an expectation of implementation or maintenance of the written program as part of an effective program.</p>	partly	<p>Indicator AR 1.1 There is a clearly written organizational structure identifying those with responsibility for food safety and containing clearly identified job functions, including the Leadership Team and that their food safety responsibilities are established, implemented and maintained.</p> <p>Guidance and Interpretation A review of the organizational structure of the farm shall verify that the identities of those with responsibility for food safety, including hygiene measures, and the role of the Leadership Team, are documented, and include clearly identified job functions and that their food safety responsibilities are established, implemented and maintained.</p> <p>Indicator AR 3.1 The individual(s) responsible for food safety receive annual training in food safety and are provided with periodic updates as necessary or upon observation or information indicating that personnel are not meeting regulatory requirements. Training includes HACCP principles and is at least equivalent to a curriculum recognized as adequate by that required in the country of production and the country of distribution.</p> <p>Guidance and Interpretation A document review shall verify that the individual(s) responsible for food safety receive updated training as necessary, including whenever there are</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 1.1 , AR 3.1	Corrective action is sufficient to close the NC.
-------	--	--------	---	---	--

		<p>significant operational changes, and at least annually.</p> <p>A document review shall verify that the person responsible for the HACCP-based food safety plan must have completed formal, classroom-based HACCP training within the past five years. Recertification after five years may be completed online.</p>			
--	--	--	--	--	--

FSM 4.1	<p>The review of AR 1.2 clearly states the requirement of compliance with regulatory and other food safety requirements. However, the standard requirement does not clearly define the need for the regulatory requirement in "both the countries of production and intend sales".</p>	partly	<p>Indicator AR 1.2 There is a clearly written, HACCP-based food safety policy specifying the organizational commitment to food safety which is signed by senior management and communicated to all employees. The policy includes procedures for compliance with regulatory and other requirements for food safety in both the country where produced and where intended for sale and includes objectives by which it measures its food safety commitment, emphasizing a commitment to continuous improvement.</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 1.2	Corrective action is sufficient to close the NC.
---------	---	--------	--	--	--

FSM 7.2	<p>The review of AR 17.1 defines threat assessments the identify and document threats and mitigations. However, the standard requirement does not specify "the mitigation of public health risk from any identified food defense threats."</p>	partly	<p>Indicator AR 17.1 A food defense plan shall be documented and identify food defense threats and the measures and methods implemented to mitigate these threats including any potential risks or issues for public health.</p> <p>Guidance and Interpretation A document review shall verify that the assessment is in the form of a vulnerability assessment that should identify threats and document mitigation strategies to reduce or eliminate such threats including any potential risks or issues for public health.</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 17.1	Corrective action is sufficient to close the NC.	
---------	---	--------	--	---	--	--

FSM 8.2	<p>The review of AR 18.1 verifies the assessment is documented, and contains mitigation strategies.</p> <p>However, the requirement and guidance do not specify the need to mitigation to public health risk potential issues.</p>	partly	<p>Indicator AR 18.1 A food fraud mitigation plan shall be documented and identify food fraud vulnerabilities and the measures and methods implemented to control identified vulnerabilities including any potential risks or issues for public health.</p>	<p>Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 18.1</p>	<p>Corrective action is sufficient to close the NC.</p>	
---------	---	--------	--	--	---	--

GAP3.8.1	<p>The review of PH 5.1 and 5.2 in addition to the elements of 3.7 do not clearly specify contamination from highways, neighboring fields, etc. in the current language.</p>	partly	<p>Indicator PH 5.1 Packing facilities are located and designed to prevent cross-contamination:</p> <ol style="list-style-type: none"> 1. Packing house uses a linear product flow; 2. Roof does not leak; 3. Floors are properly sloped and maintained to ensure adequate drainage and minimize pooling water; 4. Drains and pipes are covered and corrosion-resistant; 5. Walls, fixtures, and ceilings are able to be adequately cleaned; 6. Maintenance areas are separate from processing area, and care is taken when making repairs on the line; and 7. Access to the facility is limited to necessary personnel and approved visitors. 8. The systems used for water courses shall be designed and constructed to avoid potential for contamination including from highways, and from neighboring fields with animal waste and silo seepage 9. A review of prior land use shall be taken into consideration. <p>Guidance and Interpretation Visual observation of packing facilities shall verify that:</p> <ol style="list-style-type: none"> 1. There is a linear flow of material through the facility; 2. The roof does not leak; 	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: PH 5.1, PH 5.2	Corrective action is sufficient to close the NC.
----------	---	--------	--	--	--

		<p>3. Floors have been sloped to ensure adequate drainage, minimize pooling water, and have surfaces that facilitate cleaning;</p> <p>4. Walls, fixtures, and ceilings are able to be adequately cleaned;</p> <p>5. Drains and pipes are covered and are corrosion-resistant and can be accessed for cleaning;</p> <p>6. Maintenance areas are separate from processing area, and care is taken when making repairs on the line; and</p> <p>7. Access points leading into the facility can be restricted so access can be limited to necessary personnel and approved visitors</p> <p>8. there is no potential for contamination from water courses, adjacent highways and from neighboring fields with animal waste and silo seepage.</p> <p>9. A planned maintenance program is in place for the site and equipment.</p> <p>Indicator PH 5.2 Facility and equipment location, design, and layout are constructed and installed to avoid contamination of produce. Facility is constructed in such a way that floors, walls, fixtures, drains, and pipes can be adequately cleaned and kept in good repair and potential for contamination including from highways, and from neighboring fields with animal waste and silo seepage can be avoided.</p>		
--	--	--	--	--

			<p>.</p> <p>Maintenance of facility and equipment is carried out in a manner that prevents contamination of the produce.</p> <p>Guidance and Interpretation</p> <p>Visual observation of packing facilities shall verify that:</p> <ol style="list-style-type: none">1. Facility location is evaluated to allow for grounds surrounding location to be maintained to prevent the contamination of produce including from highways, neighboring fields with animal waste and silo seepage;2. Floors, walls, fixtures, drains, and pipes can be easily cleaned and maintained; and3. The facility and equipment are maintained in a manner that prevents contamination of the produce.2. 4. A planned maintenance program is in place for the site and equipment to minimize food safety risks and ensure that maintenance activities shall not present food safety risks.		
--	--	--	--	--	--

GAP4.4.1	<p>The review of AR 10.1, 10.2, WA 1.1 and 1.4 contain compliance criteria for agricultural related concerns. However the guidance is vague with regards to veterinary inputs with regards to microbial or chemical contamination.</p>	partly	<p>Indicator AR 10.1 Any inputs, including services, purchased from outside sources that may have an effect on food safety are documented and assessed for risk, documented in specifications, kept current and securely stored, and are readily accessible. There is a written specification review policy in place, and any risk identified is appropriately managed. For any agricultural and veterinary inputs, documented procedures shall be in place to ensure the application of these is managed properly to minimize the potential for microbial or chemical contamination.</p> <p>Guidance and Interpretation A document review shall verify that a risk assessment and specifications for all inputs (including services, agricultural and veterinary inputs)) have been documented for all inputs that may impact food safety, are kept current and securely stored, are readily available, and that all identified risks including any microbiological and chemical risks are managed under the food safety plan.</p> <p>Indicator AR 10.2 The farm maintains control over any processes or activities that are outsourced including the application of agricultural and veterinary inputs and could have an effect on food safety. Outsourced</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 10.1, AR 10.2, WA 1.1, WA 1.4	Corrective action is sufficient to close the NC.	
----------	---	--------	---	--	--	--

		<p>processes/activities are identified and documented.</p> <p>Guidance and Interpretations</p> <p>A document review shall verify that there is a documented risk assessment for all outsourced processes or activities including agricultural and veterinary inputs that may impact food safety and that all risks identified including any microbiological and chemical risks are managed under the food safety plan.</p> <p>Indicator WA 1.1</p> <p>Water sources, uses, quality, delivery systems, and equipment are documented, assessed for food safety risk, and sourced in a manner that is compliant with existing regulations.</p> <p>1. A description of the water system sufficient to facilitate a risk assessment is prepared, which can include maps, photographs, drawings, etc. to communicate the location of the source, permanent fixtures, and the flow of the water system.</p> <p>2. An initial risk assessment is required to develop a microbial water quality profile of the agricultural water source. A minimum number of samples must be taken as close in time as possible but prior to harvest pursuant to the microbiological drinking water standards of the country of production and country of distribution for the following:</p> <ul style="list-style-type: none"> a. an untreated surface water source, and b. an untreated ground water source. 		
--	--	---	--	--

		<p>The number of samples of agricultural water must be representative of the farm's use.</p> <p>3. A review or new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system such as a change in the application of agricultural and veterinary inputs.</p> <p>4. In crop production, the use and quality of water, water application methods, and application schedules are assessed with respect to crop characteristics and the degree of contact with the edible portion of the crop for the purpose of identifying conditions that may result in contamination with pathogens.</p> <p>5. Appropriate actions are taken to eliminate or minimize the potential for contamination from water used for crop production.</p> <p>6. If agricultural water is stored, tanks, containers or systems shall not be a source of contamination for water or product.</p> <p>Guidance and Interpretation</p> <p>A document review shall verify that there is a documented food safety risk assessment for water sources, delivery systems, and equipment including any storage tanks, containers or cisterns. The risk assessment shall include:</p> <p>1. A description of the water system identifying the source, permanent fixtures, including any storage</p>		
--	--	--	--	--

		<p>tanks, containers or cisterns and the flow of the water system;</p> <p>2. A microbial water quality profile of the agricultural water source, based on a representative number of samples;</p> <p>3. Identification of conditions that may result in contamination with pathogens is made through an analysis of the use and quality of water, water storage and application methods, and application schedules with respect to crop characteristics and the degree of contact with the edible portion of the crop;</p> <p>4. An analysis of irrigation methods for their potential to introduce, support, or promote growth of human pathogens, including the potential to deposit soil on the crops or for water leakage; and</p> <p>5. Written evidence demonstrates that actions are taken to eliminate or minimize the potential for contamination from water used for crop production including the use of stored agricultural water.</p> <p>Written evidence shall verify that the risk assessment has been reviewed or updated, or a new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system such as a change in the application of agricultural and veterinary inputs.</p>		
--	--	--	--	--

		<p>Indicator WA 1.4</p> <p>Farm assesses and manages risk of microbial and chemical contamination in water (including water used for ice) that directly contacts grown and harvested crops or that is used on food contact surfaces and from any application of agricultural and veterinary inputs. Water meets microbial standards of existing regulations in the country of production and destination, whichever is greater or more stringent. If water does not meet applicable microbial standards, use of the water source is discontinued, and water is treated with approved, suitable methods to achieve those standards. The treatment process is effectively monitored and controlled to ensure that treatment is effective. Treated water is tested to verify it meets microbial standards before using.</p> <p>Documented procedures shall be in place to ensure that the application of agricultural and veterinary products is managed properly to minimize the potential for microbial or chemical contamination</p> <p>Guidance and Interpretation</p> <p>A review of microbial test results shall verify that water, whether treated or not, (including water used for ice) that directly contacts grown and harvested crops or that is used on food contact surface has been:</p>		
--	--	--	--	--

		<div><div><div>1. Tested according to the sampling and testing procedures of the water management plan; and</div><div>2. Meets microbial standards.</div><div>3. Meets chemical standards.</div></div><div>A review of corrective actions taken when water does not meet applicable microbial standards shall verify that the water was treated using a monitored, controlled, and effective process that resulted in achieving drinking water standards. Where this standard was not achieved, evidence shall verify that the use of the water source has been discontinued.</div></div>			
--	--	---	--	--	--

GAP4.5	The review of EA 1.1 and 1.2 does not show language requiring provision for product dropped to the ground.	no	<p>Indicator EA 1.1 Historical land uses for production fields are identified, documented, and assessed for any food safety issues that could arise from these uses. The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination. 1. Evaluation includes a physical description of the soil type in each field, the crop history, and soil amendment history. 2. Land has not previously been used for animal husbandry or biosolid disposal. (If the land has been used for animal husbandry, a three-year buffer time is required before using the field for edible crop cultivation. If the land has been used for animal husbandry or biosolid disposal, the soil should be tested for persistent pathogen populations.) 3. Where there is a possibility of pathogen contamination, necessary corrections are performed to minimize the potential for an adverse food safety impact or conclude that the land shall not be used for producing production until the risks have been minimized.</p> <p>Guidance and Interpretation A document review shall verify that a land use assessment has been completed for all crop fields that identifies food safety risks that arise from the historical use of the land which:</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: EA 1.1, EA 1.2	Corrective action is sufficient to close the NC.
--------	---	----	---	--	--

		<p>1. Includes a physical description of the soil type in each field, the crop history, and soil amendment history;</p> <p>2. Stipulates that land previously used for animal husbandry must have had a three-year buffer time before using the field for edible crop cultivation;</p> <p>3. Stipulates that land previously used for or biosolid disposal must have had soil tested for persistent pathogen populations;</p> <p>4. Stipulates that any product dropped to the ground is discarded.</p> <p>54. Stipulates that where there is a possibility of pathogen contamination, either:</p> <ul style="list-style-type: none"> a. Necessary corrections have performed to minimize the potential for an adverse food safety impacts, or b. The land has not been used for produce production until the risks have been minimized. <p>Indicator EA 1.2</p> <p>A review or new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system.</p> <p>.The site shall be located and maintained to enable the reception, storage production and distribution</p>		
--	--	---	--	--

			<p>of safe food and to prevent its contamination including any product dropped to the ground.</p> <p>Guidance and Interpretation A review of the land use assessment including location and maintenance shall verify that it has been updated at the beginning of each growing season, or when there is a situation that could introduce contamination.</p>			
--	--	--	--	--	--	--

GAP11.5	The review of WA 1.1 contains compliance information; however it does not specify actions for stored water and sources of contamination.	partly	<p>Indicator WA 1.1 equipment are documented, assessed for food safety risk, and sourced in a manner that is compliant with existing regulations.</p> <p>1. A description of the water system sufficient to facilitate a risk assessment is prepared, which can include maps, photographs, drawings, etc. to communicate the location of the source, permanent fixtures, and the flow of the water system.</p> <p>2. An initial risk assessment is required to develop a microbial water quality profile of the agricultural water source. A minimum number of samples must be taken as close in time as possible but prior to harvest pursuant to the microbiological drinking water standards of the country of production and country of distribution for the following:</p> <ul style="list-style-type: none"> a. an untreated surface water source, and b. an untreated ground water source. <p>The number of samples of agricultural water must be representative of the farm's use.</p> <p>3. A review or new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system such as a change in the application of agricultural and veterinary inputs.</p> <p>4. In crop production, the use and quality of water, water application methods, and application schedules are assessed with respect to crop</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: WA 1.1	Corrective action is sufficient to close the NC.
---------	--	--------	---	--	--

		<p>characteristics and the degree of contact with the edible portion of the crop for the purpose of identifying conditions that may result in contamination with pathogens.</p> <p>5. Appropriate actions are taken to eliminate or minimize the potential for contamination from water used for crop production.</p> <p>6. If agricultural water is stored, tanks, containers or systems shall not be a source of contamination for water or product.</p> <p>Indicator WA 1.2</p> <p>A water management plan is established and documented and includes:</p> <ol style="list-style-type: none">1. Preventive controls;2. Monitoring and verification procedures;3. Corrective actions; and4. Documentation		
--	--	--	--	--

GAP14.2	<p>The review of WA 1.7, 1.8, and SAM 3.3 do not express the need for consideration of the World Health Organisation guidelines for safe water.</p>	no	<p>Indicator WA 1.7 There is a written policy separating water systems that convey untreated human or animal waste from those for agricultural use. Policy is implemented and takes into consideration the World Health Organization (WHO) guidelines on the safe use of wastewater and livestock excreta in agriculture as appropriate. .</p> <p>Indicator WA 1.8 The water system prevents backflow from and cross-contamination with wastewater or sewage piping systems. Plumbing is maintained to avoid being a source of contamination to produce, water sources, or food contact surfaces.</p> <p>Guidance and Interpretation A review of the water management plan which takes into consideration the WHO guidelines on the safe use of wastewater and livestock excreta and visual observation shall verify that there are elements designed to prevent backflow, backflow preventers, or other equivalent technologies between water for agricultural or potable use with systems used for human or animal wastes. A document review shall verify that plumbing is maintained.</p> <p>Indicator SAM 3.3 Any product containing human waste, except for biosolids as described in SAM 3.4, or raw or incompletely treated manure is not used.</p> <p>Guidance and Interpretation A document review</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: WA 1.7, WA 1.8, SAM 3.3	Corrective action is sufficient to close the NC.
---------	--	----	--	---	--

			<p>taking into consideration the WHO guidelines on the safe use of wastewater and livestock excreta shall verify that a prohibition on human waste, except for biosolids as described in SAM 3.4, and raw manure has been documented.</p> <p>Visual observation shall verify that no human waste or raw manure is being applied.</p>			
--	--	--	--	--	--	--

HACCP 1.1	<p>Reviewed sections AR1.2, 2.1, which reference food safety, and AM 1.1 that references allergen management. The sections identified in the standard contain a statement of description for compliance and criteria that defines acceptable objective evidence.</p> <p>However, while AM 1.1 include cross contamination, it does not address cross contact.</p>	partly	<p>Indicator AR 1.2 There is a clearly written, HACCP-based food safety policy specifying the organizational commitment to food safety which is signed by senior management and communicated to all employees. The policy includes procedures for compliance with regulatory and other requirements for food safety in both the country where produced and where intended for sale and includes objectives by which it measures its food safety commitment, emphasizing a commitment to continuous improvement.</p> <p>Indicator AR 2.1 The HACCP-based food safety plan identifies and assesses all locations of the operation and all products and/or product groupings covered by the plan. The plan assesses the likely physical, chemical, and biological hazards and contaminants at each step of the process and for each product category and the procedures to control those hazards, including monitoring, verification, corrective actions, and recordkeeping, for the following areas: water, soil amendments, environmental assessments, animals, harvest and post-harvest, and worker sanitation. The food safety plan includes Standard Operating Procedures (SOPs) and other relevant work instructions appropriate to controlling the identified hazards.</p> <p>Indicator AM 1.1 The allergen management program shall include a</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 1.2, AR 2.1, AM 1.1	Corrective action is sufficient to close the NC.
-----------	--	--------	---	--	--

		<p>risk assessment of products, inputs, processing aids, and other sources of allergens (e.g. outside contamination such as personnel lunches) and how identified allergen risks are controlled to prevent allergen cross-contact in the food safety plan. Farmworkers are trained in proper handling of allergens.</p> <p>Guidance and Interpretation. A document review shall verify that procedures and responsibilities used to control allergens are documented and implemented.</p> <p>A document review shall verify that farmworkers have been trained in proper handling of allergens and how to prevent cross-contact.</p>		
--	--	---	--	--

HACCP 1.2	<p>The review of section AR 2.1 defines the scope to include the areas of all operations, all products, and / or all product groupings.</p> <p>However the requirement does not clearly identify the requirement of per process or production step.</p>	partly	<p>Indicator AR 2.1</p> <p>The HACCP-based food safety plan identifies and assesses all locations of the operation and all products and/or product groupings covered by the plan. The plan assesses the likely physical, chemical, and biological hazards and contaminants at each step of the process and for each product category and the procedures to control those hazards, including monitoring, verification, corrective actions, and recordkeeping, for the following areas: water, soil amendments, environmental assessments, animals, harvest and post-harvest, and worker sanitation. The food safety plan includes Standard Operating Procedures (SOPs) and other relevant work instructions appropriate to controlling the identified hazards.</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 2.1	Corrective action is sufficient to close the NC.	
--------------	--	--------	--	--	--	--

FSM 1	<p>The review of AR 1.1 and AR 3.1 shows compliance to the requirement for identification of responsibilities, and job functions.</p> <p>However the requirement and guidance do not discuss or set an expectation of implementation or maintenance of the written program as part of an effective program.</p>	partly	<p>Indicator AR 1.1 There is a clearly written organizational structure identifying those with responsibility for food safety and containing clearly identified job functions, including the Leadership Team and that their food safety responsibilities are established, implemented and maintained.</p> <p>Guidance and Interpretation A review of the organizational structure of the farm shall verify that the identities of those with responsibility for food safety, including hygiene measures, and the role of the Leadership Team, are documented, and include clearly identified job functions and that their food safety responsibilities are established, implemented and maintained.</p> <p>Indicator AR 3.1 The individual(s) responsible for food safety receive annual training in food safety and are provided with periodic updates as necessary or upon observation or information indicating that personnel are not meeting regulatory requirements. Training includes HACCP principles and is at least equivalent to a curriculum recognized as adequate by that required in the country of production and the country of distribution.</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 1.1, AR 3.1	Corrective action is sufficient to close the NC.
-------	--	--------	---	--	--

FSM 4.1	<p>The review of AR 1.2 clearly states the requirement of compliance with regulatory and other food safety requirements. However, the standard requirement does not clearly define the need for the regulatory requirement in "both the countries of production and intend sales".</p>	partly	<p>Indicator AR 1.2 There is a clearly written, HACCP-based food safety policy specifying the organizational commitment to food safety which is signed by senior management and communicated to all employees. The policy includes procedures for compliance with regulatory and other requirements for food safety in both the country where produced and where intended for sale and includes objectives by which it measures its food safety commitment, emphasizing a commitment to continuous improvement.</p> <p>Guidance and Interpretation A review of the HACCP-based written food safety policy shall verify that it:</p> <ol style="list-style-type: none"> 1. Specifies the organization's commitment to food safety; 2. Contains a commitment to continuous improvement; 3. Contains procedures to comply with regulatory and other requirements for food safety in both the country where produced and the country where it is intended for sale ; 4. Contains objectives by which it measures its food safety commitment; and 5. Is signed by senior management. 	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 1.2	Corrective action is sufficient to close the NC.
---------	---	--------	--	--	--

FSM 7.2	<p>The review of AR 17.1 defines threat assessments the identify and document threats and mitigations. However, the standard requirement does not specify "the mitigation of public health risk from any identified food defense threats."</p>	partly	<p>Indicator AR 17.1 A food defense plan shall be documented and identify food defense threats and the measures and methods implemented to mitigate these threats including any potential risks or issues for public health.</p> <p>Guidance and Interpretation A document review shall verify that the assessment is in the form of a vulnerability assessment that should identify threats and document mitigation strategies to reduce or eliminate such threats including any potential risks or issues for public health.</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 17.1	Corrective action is sufficient to close the NC.	
---------	---	--------	--	---	--	--

FSM 8.2	<p>The review of AR 18.1 verifies the assessment is documented, and contains mitigation strategies.</p> <p>However, the requirement and guidance do not specify the need to mitigation to public health risk potential issues.</p>	partly	<p>Indicator AR 18.1 A food fraud mitigation plan shall be documented and identify food fraud vulnerabilities and the measures and methods implemented to control identified vulnerabilities including any potential risks or issues for public health.</p> <p>Guidance and Interpretation A document review shall verify that the assessment is in the form of a vulnerability assessment that should identify threats and document mitigation strategies to reduce or eliminate such threats including any potential risks or issues for public health.</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicators: AR 18.1	Corrective action is sufficient to close the NC.	
---------	---	--------	---	---	--	--

GMP 1	<p>The review of EA 1.1 and 1.2 does not clearly identify the requirements of this clause. Clause PH 1.1 appears to have relevant information for this clause.</p>	partly	<p>Indicator EA 1.1 Historical land uses for production fields are identified, documented, and assessed for any food safety issues that could arise from these uses. The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination. 1. Evaluation includes a physical description of the soil type in each field, the crop history, and soil amendment history. 2. Land has not previously been used for animal husbandry or biosolid disposal. (If the land has been used for animal husbandry, a three-year buffer time is required before using the field for edible crop cultivation. If the land has been used for animal husbandry or biosolid disposal, the soil should be tested for persistent pathogen populations.) 3. Where there is a possibility of pathogen contamination, necessary corrections are performed to minimize the potential for an adverse food safety impact or conclude that the land shall not be used for produce production until the risks have been minimized.</p> <p>Guidance and Interpretation A document review shall verify that a land use assessment has been completed for all crop fields that identifies food safety risks that arise from the historical use of the land which: 1. Includes a physical description of the soil type in</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicator: EA 1.1, EA 1.2, PH 1.1		Corrective action is sufficient to close the NC.
-------	---	--------	---	---	--	--

		<p>each field, the crop history, and soil amendment history;</p> <p>2. Stipulates that land previously used for animal husbandry must have had a three-year buffer time before using the field for edible crop cultivation;</p> <p>3. Stipulates that land previously used for or biosolid disposal must have had soil tested for persistent pathogen populations;</p> <p>4. Stipulates that any product dropped to the ground is discarded.</p> <p>54. Stipulates that where there is a possibility of pathogen contamination, either:</p> <ul style="list-style-type: none"> a. Necessary corrections have performed to minimize the potential for an adverse food safety impacts, or b. The land has not been used for produce production until the risks have been minimized. <p>Indicator EA 1.2</p> <p>A review or new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system.</p> <p>The site shall be located and maintained to enable</p>		
--	--	--	--	--

		<p>the reception, storage production and distribution of safe food and to prevent its contamination including any product dropped to the ground.</p> <p>Guidance and Interpretation A review of the land use assessment including location and maintenance shall verify that it has been updated at the beginning of each growing season, or when there is a situation that could introduce contamination.</p> <p>Indicator PH 1.1 A risk assessment identifies and documents conditions during post-harvest including the site location and maintenance both interior and exterior, sorting, packing, washing, cooling, storage, loading, and transport, which may result in contamination of produce. Appropriate actions are taken to address findings to reduce risk to food safety and enable the production of safe products.</p> <p>Historical land uses for production fields are identified, documented, and assessed for any food safety issues that could arise from these uses.</p> <p>Guidance and Interpretation A document review shall verify that a post-harvest risk assessment has been completed including historical land use, site location and maintenance (both interior and exterior) that includes a corrective action plan to reduce risks to food safety that may arise during:</p> <ol style="list-style-type: none"> 1. Sorting; 2. Packing; 		
--	--	---	--	--

			<div>3. Washing; 4. Cooling; 5. Storage; 6. Loading; and 7. Transport .</div> <div>A document review shall verify that corrective actions have been undertaken as set out in AR 6.1 and AR 6.2.</div>			
--	--	--	---	--	--	--

GMP 2	<p>The review of PH 1.1 does not clearly reflect the requirements of this clause. (Are element 1 and 2 transposed?) EA 1.1 and 1.2 appear to have relevant information for this clause.</p>	partly	<p>Indicator EA 1.1 Historical land uses for production fields are identified, documented, and assessed for any food safety issues that could arise from these uses. The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination. 1. Evaluation includes a physical description of the soil type in each field, the crop history, and soil amendment history. 2. Land has not previously been used for animal husbandry or biosolid disposal. (If the land has been used for animal husbandry, a three-year buffer time is required before using the field for edible crop cultivation. If the land has been used for animal husbandry or biosolid disposal, the soil should be tested for persistent pathogen populations.) 3. Where there is a possibility of pathogen contamination, necessary corrections are performed to minimize the potential for an adverse food safety impact or conclude that the land shall not be used for produce production until the risks have been minimized.</p> <p>Guidance and Interpretation A document review shall verify that a land use assessment has been completed for all crop fields that identifies food safety risks that arise from the historical use of the land which: 1. Includes a physical description of the soil type in</p>	Food Safety Standards Guidance and Interpretations v3.0 - Indicator: EA 1.1, EA 1.2	Corrective action is sufficient to close the NC.
-------	--	--------	--	---	--

		<p>each field, the crop history, and soil amendment history;</p> <p>2. Stipulates that land previously used for animal husbandry must have had a three-year buffer time before using the field for edible crop cultivation;</p> <p>3. Stipulates that land previously used for or biosolid disposal must have had soil tested for persistent pathogen populations;</p> <p>4. Stipulates that any product dropped to the ground is discarded.</p> <p>54. Stipulates that where there is a possibility of pathogen contamination, either:</p> <ul style="list-style-type: none"> a. Necessary corrections have performed to minimize the potential for an adverse food safety impacts, or b. The land has not been used for produce production until the risks have been minimized. <p>Indicator EA 1.2</p> <p>A review or new assessment is conducted at the beginning of each growing season, any time there is a change in the system, or when a situation occurs that could introduce an opportunity for contamination of the system.</p> <p>The site shall be located and maintained to enable</p>		
--	--	--	--	--

			<p>the reception, storage production and distribution of safe food and to prevent its contamination including any product dropped to the ground.</p> <p>Guidance and Interpretation</p> <p>A review of the land use assessment including location and maintenance shall verify that it has been updated at the beginning of each growing season, or when there is a situation that could introduce contamination.</p>			
--	--	--	--	--	--	--

GMP 3	The review of PH 5.1 contains requirements on roof, floor, and drains but does not contain references to location, floors, walls, fixtures, etc. as outlined in PH 5.2.	partly	<p>Indicator PH 5.2 Facility and equipment location, design, and layout are constructed and installed to avoid contamination of produce. Facility is constructed in such a way that floors, walls, fixtures, drains, and pipes can be adequately cleaned and kept in good repair and potential for contamination including from highways, and from neighboring fields with animal waste and silo seepage can be avoided.</p> <p>Maintenance of facility and equipment is carried out in a manner that prevents contamination of the produce.</p> <p>Guidance and Interpretation Visual observation of packing facilities shall verify that:</p> <ol style="list-style-type: none"> 1. Facility location is evaluated to allow for grounds surrounding location to be maintained to prevent the contamination of produce including from highways, neighboring fields with animal waste and silo seepage; 2. Floors, walls, fixtures, drains, and pipes can be easily cleaned and maintained; and 3. The facility and equipment are maintained in a manner that prevents contamination of the produce. 2. 4. A planned maintenance program is in place for the site and equipment to minimize food safety risks 	Food Safety Standards Guidance and Interpretations v3.0 - Indicator: PH 5.2	Corrective action is sufficient to close the NC.
-------	--	--------	---	---	--

			and ensure that maintenance activities shall not present food safety risks.			
--	--	--	---	--	--	--

GMP 6.4	The review of AR 12.8 partially contains the requirement for 6.3 but does not contain the elements of clause 6.1 and 6.2 as outlined in the evidence used for elements 6.1 and 6.2.	partly	<p>Indicator AR 12.8 To minimize food safety risks, the following shall be established, implemented and maintained:</p> <ol style="list-style-type: none"> 1.Documented personal hygiene standards 2.Provision of suitable protective clothing 3.A medical screening procedure for communicable disease for all employees, visitors, and contractors who come into contact with produce or food contact materials to identify conditions impacting food safety. Any persons affected shall immediately report illness or symptoms to management, subject to legal restrictions in the country of operation. <p>Guidance and Interpretation A document review and FWIs shall verify that</p> <ol style="list-style-type: none"> 1.Suitable protective clothing is provided. 2. There is a screening procedure for communicable diseases in place for all employees, visitors, and contractors. 3.Any persons affected shall immediately report illness or symptoms to management, subject to legal restrictions in the country of operation. 	Food Safety Standards Guidance and Interpretations v3.0 - Indicator: AR 12.8	Corrective action is sufficient to close the NC.
---------	--	--------	---	--	--

GMP 11	<p>However, the CPO has stated that the evidence is only partially compliant. Request the additional information.</p>	partly	<p>Indicator WA 1.3 Water sources, distribution systems, and equipment used to maintain water quality are not a source of contamination and are inspected and maintained according to a documented maintenance schedule. Wells used as water sources are maintained and repaired as needed, and all unused wells are properly shut down. Reasonable measures must be implemented to reduce the potential for contamination of produce with known or reasonably foreseeable hazards as a result of contact with pooled water.</p> <p>Indicator WA 1.4 Farm assesses and manages risk of microbial and chemical contamination in water (including water used for ice) that directly contacts grown and harvested crops or that is used on food contact surfaces and from any application of agricultural and veterinary inputs. Water meets microbial standards of existing regulations in the country of production and destination, whichever is greater or more stringent. If water does not meet applicable microbial standards, use of the water source is discontinued, and water is treated with approved, suitable methods to achieve those standards. The treatment process is effectively monitored and controlled to ensure that treatment is effective. Treated water is tested to verify it meets microbial</p>	<p>Food Safety Standards Guidance and Interpretations v3.0 - Indicator: WA 1.3, WA 1.4, WA 1.9, PH 3.9</p>	<p>Corrective action is sufficient to close the NC.</p>
--------	--	--------	--	--	---

		<p>standards before using.</p> <p>Documented procedures shall be in place to ensure that the application of agricultural and veterinary products is managed properly to minimize the potential for microbial or chemical contamination</p> <p>Indicator WA 1.9</p> <p>Microbial testing is conducted using scientifically valid test methods to verify the adequacy of water quality. Testing is conducted according to current regulatory requirements, current science, and the risk assessment, for microbial pathogens of concern and standard indicators of fecal contamination. Points of water sampling are based on the particular history, location, and risk assessment of the source.</p> <p>Testing is conducted according to current regulatory requirements, current science, and the risk assessment, and at least monthly. If safety problems are identified, corrections should take place and testing should be increased to daily until problem is resolved. The local water authority microbial analysis may be used to document adequacy.</p> <p>Water analysis is performed by a laboratory accredited to ISO 17025 or equivalent.</p> <p>Indicator PH 3.9</p>		
--	--	--	--	--

			Air cooling systems are appropriately designed and maintained to avoid contaminating fresh produce.			
--	--	--	---	--	--	--

GMP 19	<p>The review of PH 4.1, 5.1, 5.2 contain elements of compliance for this clause. However, there is no evidence of planned maintenance programs stated.</p>	partly	<p>Indicator PH 4.1 Sanitation schedule includes, but is not limited to, SOPs for cleaning, sanitizing, and maintaining the following:</p> <ol style="list-style-type: none"> 1. Harvest containers and equipment; 2. Fields; 3. Packing facilities, floors, drains, equipment, food contact surfaces, fixtures, tools; 4. Lines used for washing, grading, sorting, and packing; 5. Packing materials; 6. Storage facilities; 7. Cooling rooms, cooling units, coolers, cooling systems; 8. Containers for finished product; and 9. Trash cans and cleaning equipment. <p>Cleaning agents, chemicals, and lubricants are stored in a designated area, away from produce, and are suitable for their intended use.</p> <p>Records of date and method of cleaning and sanitizing are maintained.</p> <p>.A planned maintenance program is in place for the site and equipment</p> <p>Indicator PH 5.1</p> <p>Packing facilities are located and designed to prevent cross-contamination:</p> <ol style="list-style-type: none"> 1. Packing house uses a linear product flow; 2. Roof does not leak; 	<p>Food Safety Standards Guidance and Interpretations v3.0 - Indicator: PH 4.1, PH 5.1, PH 5.2</p>	<p>Corrective action is sufficient to close the NC.</p>
--------	--	--------	---	--	---

		<p>3. Floors are properly sloped and maintained to ensure adequate drainage and minimize pooling water;</p> <p>4. Drains and pipes are covered and corrosion-resistant;</p> <p>5. Walls, fixtures, and ceilings are able to be adequately cleaned;</p> <p>6. Maintenance areas are separate from processing area, and care is taken when making repairs on the line; and</p> <p>7. Access to the facility is limited to necessary personnel and approved visitors.</p> <p>8. The systems used for water courses shall be designed and constructed to avoid potential for contamination including from highways, and from neighboring fields with animal waste and silo seepage</p> <p>9. A review of prior land use shall be taken into consideration.</p> <p>Indicator PH 5.2</p> <p>Facility and equipment location, design, and layout are constructed and installed to avoid contamination of produce. Facility is constructed in such a way that floors, walls, fixtures, drains, and pipes can be adequately cleaned and kept in good repair and potential for contamination including from highways, and from neighboring fields with animal waste and silo seepage can be avoided.</p>		
--	--	---	--	--

			<p>• Maintenance of facility and equipment is carried out in a manner that prevents contamination of the produce.</p>			
--	--	--	---	--	--	--

RESULTS OF THE PUBLIC STAKEHOLDER CONSULTATION

TBC

List of findings – public stakeholder consultation

			Answer	Recommendation from Benchmark leader	Decision from GFSI technical manager