

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Japan	CB 1	CB	Section 3	Matrix	Trainee	Educational qualifications,	Content Feedback	I definitely agree with 「Degree or diploma in Food Sciences or other equivalent field OR Relevant experience in the food industry」 I strongly recommend that degree or diploma in Food Sciences is not necessary.	Agreed
United Kingdom	NGO 1	NGO's/IGO's	Section 1	Overall Section			Suggestion	(Organisation) acknowledge the need to attract people from a variety of backgrounds if we are to improve the shortage of competent auditors in the industry. It will be important that solid, in-depth food safety knowledge is acquired. For example, it is one thing to have food safety Level 4 qualification (which is 1 week of training) and another to assess a complex food business deploying food safety mechanics which require a good understanding of microbiology and/or allergen principles. It is clear that the authors have considered the framework for auditors' careers. However, students at levels 3, 4 and even 5 will have very limited knowledge of auditing let alone consider it as a career. In the UK, for example, there are Level 3 Diplomas that cover food quality assurance but it's really only at levels 6 and 7 that they become aware through doing exercises in the application of HACCP. Like so many other pathways through Food Science and Technology, schools and students are unaware of the possibilities. Hence, there needs to be considerable effort to encourage people to enter the 'funnel' of Figure 1 before they can even start their journey. There must be clear signposting of the career pathway(s) so that prospective candidates can make these choices.	Noted
United Kingdom	NGO 1	NGO's/IGO's	Section 2	2.2 Levels			Content Feedback	Entry Level Auditor - the name should be reviewed as this suggests that the person is capable of delivering the audits while actually, it is the lowest level of competency. Perhaps "Apprentice Auditor" would be more appropriate Trainee Auditor - It seems that people at this level would be allowed to complete independent audits with minimal day-to-day supervision. At this level, (Organisation) believe that they would be competent to participate in audits as auditors who are part of an auditing team but not yet solo. Solo audits should come at the next level "Auditor". Hence removal of the "minimal day-to-day supervision" would seem appropriate. Expert levels - It might be beneficial to set up the mechanics where people recognised at this level can provide a feedback loop which, after consideration by key stakeholders, can be used to drive continuous improvement of the standard either in the following versions or as a position statement. We would also suggest on the basis of the comments above that (in the UK at least) the Entry level Auditor and Novice Auditor - [Section 3 Matrix, A Technical aspects..., a. Knowledge of ...] - makes little sense as people at this level generally know very little regarding auditing, though they may have a basic food hygiene qualification. Perhaps these 2 should be conflated with Trainee Auditor being stages towards becoming an Auditor. Rather than 'preparing for a degree...' it should state '...studying for a degree...'	Opportunity Identified
United Kingdom	NGO 1	NGO's/IGO's	Section 2	Figure 3			Content Feedback	(Organisation) suggest that Figure 3 would benefit from clarification, as currently it implies that at the early stages, no auditing capability competencies are required until reaching the Auditor level. For example, evidence-based approach is placed in the Technical Expert / Audit Team Leader quadrant while this should be taught at entry level to auditors. At an expert level, IFST would expect the auditor to be proficient enough to comfortably interpret specific clauses and the intentions behind why they were included in a given standard to allow to make a judgement call beyond immediate evidence. Also, it is not clear at which point in the development an individual is competent to conduct independent audits. We believe this should be made clearer.	Opportunity Identified
United Kingdom	NGO 1	NGO's/IGO's	Section 3	Matrix	Entry	Codex General Principles of Food Hygiene Or Equivalent,	Content Feedback	Knowledge of food systems - Entry-level auditor would be required to have "Level 1 Food Hygiene or equivalent". This is an extremely low level requirement for someone who is auditing. We would expect people with this level of knowledge to be working on the periphery of food manufacturing and most food handlers in reputable manufacturing units will have at least Level 2 Food Hygiene. We would also recommend that a lack of professional degree or college qualification means that Level 3 as a minimum should be considered as this is usually a qualification expected of Quality Supervisors and QA Managers in food factories.	Opportunity Identified
United Kingdom	NGO 1	NGO's/IGO's	Section 3	Matrix	Technical Expert	Educational qualifications,	Content Feedback	The matrix allows an auditor to become an expert without the need for a professional degree which we fully support. There should, however, be very clear guidance around time and seniority requirements to be considered as part of this.	Opportunity Identified
United Kingdom	NGO 1	NGO's/IGO's	Section 4	Self Assessment			Suggestion	IFST support the concept of a structured approach and, in spirit, it should allow for better calibrated auditors. We are unsure if this tool will work when used as "self-assessment", however, and deliver the calibration objective. CPD requires dedicated time allocation which, when auditors and auditing bodies are stretched, may be at risk of being sacrificed. Hence, the scheme seems to be better suited for an independent assessment of CDPs and awarding competency by independent organizations such as (Organisation). This would also help build confidence in the framework	Noted
United Kingdom	NGO 1	NGO's/IGO's	Section 5	Overall Section			Content Feedback	We find the framework implementation examples slightly confusing as we would expect someone conducting 2nd party supplier audits to be at least at auditor level when assessed for audit delivery	Opportunity Identified
United Kingdom	NGO 1	NGO's/IGO's	Overall document				Suggestion	(Organisation) would be happy to offer assistance as this framework is developed further as (Organisation) are the professional body for food scientists and food technologists in the UK and have previous experience in these areas.	Noted
Japan	CB 2	CB	Section 3	Matrix	Auditor	Knowledge of Food Safety Principles,	Suggestion	Degree or diploma in Food Sciences or other equivalent field OR Relevant experience in the food industry": We have strong confidence that the auditor with experience in the food industry are more competent and knowledgeable than the auditor who studied for their degrees.	Agreed
Australia	FBO 1	FBO	Section 3	Matrix	Entry	Educational qualifications,	Content Feedback	Terminology 'high school diploma' or equivalent' - confusion about what that translate too in AusNZ. Year 10? Year 12? Rather than 'basic reading and writing skills' - reading and writing are core competencies.	Opportunity Identified

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Australia	FBO 1	FBO	Overall document				Suggestion	The AusNZ LG wishes to express its thanks and appreciation for this work. Overall, the reaction is very positive to the document. In particular, the matrix was very well received. Overall, the group thought that the document could be shortened considerably given the repetition within the text and with the text and the matrix. Overall, far more verbose than it needs to be. It was well noted by the AusNZ LG that this document is focused on the 'what' rather than the 'how'. That said, it was inevitable that discussion within the group spilled over into questions about how this framework would be implemented. In short, great anticipation!	Opportunity Identified
United States of America	MAN 1	Manufacturer	Section 2	2.2 Levels			Suggestion	Similar set up exists for Six Sigma where they applied a concept of martial art for the development (Yellow Belt, Green Belt, Black Belt, Master Black Belt). The nomenclature got famous in the industry and created a familiar framework that was very successful for marketing. So one comment that I have is if there is an opportunity to apply something similar from the nomenclature standpoint (instead of calling Entry level, novice, Trainee, etc.) so it can resonate better.	Opportunity Identified
United States of America	MAN 1	Manufacturer	Section 2	2.2 Levels			Suggestion	My other comment is to consider Food Safety Auditing or Auditing (in general) certification as part of the matrix and consider a program like CFSQA In section 3 (Matrix) in the Training / Certification section for Expert Auditor criteria.	Opportunity Identified
France	MAN 2	Manufacturer	Section 1	1.1 Background			Content Feedback	We wouldn't say that consistency and quality of audits has been declining. For sure it is not at the level we expect but this is not new issue. We have worked a lot with our Certification Bodies to receive mor accurate audits so, at least on our scope, it has improved, yet not at the level we expect in many instances.	Noted
France	MAN 2	Manufacturer	Section 1	1.1 Background			Content Feedback	"lack of training and professional qualifications" : This is not true. There is profusion of training and qualification programmes for auditors. This profusion of programmes (several standards, schemes, CBs, etc.) may contribute to reduced attractiveness	Noted
France	MAN 2	Manufacturer	Section 1	1.1 Background			Content Feedback	Establishing best practices and professional standards" : They exist but they are probably not applied in a harmonised manner. There is more to be done on performance evaluation and action in case of deviation and communicable metrics for informed decisions on selection of CBs and auditors.	Noted
France	MAN 2	Manufacturer	Section 1	1.1 Background			Content Feedback	"independent auditors" : In fact, internal and 2nd party auditors are independent too. What makes 3rd party auditors specific is that they operate for a Certification Body under an accredited certification programme. So the specificity is definitely around providing certification (but pay attention on auditor is not the one granting certification, he just gives a reco for certification ... followed 100% by the certifier)	Noted
France	MAN 2	Manufacturer	Section 1	1.1 Background			Content Feedback	"training curriculum" : this was alrday developped by GFSI in 2013 : GFSI Food SAfety Auditor Competencies. This document should remain and be updated with appropriate content from this new document	Noted
France	MAN 2	Manufacturer	Section 1	1.1 Background			Content Feedback	In the context of the lack of attractivity, i suggest to replace the Funnel by a Tunnel approach. There are safety exits anyway in a tunnel. Looking at the funnel (Figure 1) i guess lots of candidates will not engage.	Noted
France	MAN 2	Manufacturer	Section 2	Figure 3			Content Feedback	Not ok with the outer circle in blue. You need to go through all attributes to start auditing. What makes the difference between a trainee auditor / co-auditor / lead auditor is the level of expertise/experience in each of the attributes. For each attribute, one can define for example 3 levels, and each auditor can be profiled based on his level for each attribute. A lead auditor is more likely to be at level 3 on all attributes than a trainee auditor. What difference between Entry level / Novice / Trainee ? Keep it simple Technical expert is something else, it's not between auditor and lead auditor.	Opportunity Identified
France	MAN 2	Manufacturer	Section 2	2.1 Principles			Suggestion	We don't see the link with the Benchmarking requirements. Technical knowlege should be linked to the requirements to be audited.	Opportunity Identified
France	MAN 2	Manufacturer	Section 2	2.2 Levels			Content Feedback	Too many levels, keep it simple A, B and C are the same Technical expert is something else, is not necessarrily "ranked" between auditor and lead auditor, is not an auditor. Even a trainee auditor can be a technical expert if has expertise in a certain domain but is not able to conduct an audit	Noted
France	MAN 2	Manufacturer	Section 3	Overall Section			Content Feedback	Table looks nice but low value at reading, often points out the obvious. The GFSI Food Safety Auditor Competencies document (Nov 2013) was more pragmatic and useful	Noted
France	MAN 2	Manufacturer	Section 4	4.1 Self Assessment			Content Feedback	This is way too light. We need an effective performance evaluation system based on customer feedback, audit KPIs review, witness audits, etc.	Opportunity Identified
France	MAN 2	Manufacturer	Section 4	Overall Section			Content Feedback	CPD activities must be recorded and monitored" : Not only CPD but also audit experience must be recorded and monitored by CB / CPOs	Opportunity Identified
France	MAN 2	Manufacturer	Overall document				Suggestion	This document shouldn't be released as is. Will not address the stakes referred to in the introduction and current mistrust in the GFSI system.	Noted
Nederland	CB 3	CB	Section 1	Figure 1			Suggestion	Missing are the individuals who have audit experience in the agricultural sector, which aren;t the GFSI schemes. When working for a CB, at the beginning of the career path, auditors where mainly mainly qualified for the national quality schemes which aren't (in some cases) GFSI .	Noted
Nederland	CB 3	CB	Section 2	Figure 3			Content Feedback	The subdivision in entry level, novice auditor and trainee auditor may be a little bit too detailed. In reality the difference in need for a novice level or trainee level may be too complex.	Opportunity Identified

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Nederland	CB 3	CB	Section 2	2.1 Principles			Content Feedback	At the audit delivery communication is mentioned. It seems like this part has mainly to do with the oral communication. Missing is the capability of written communication, when written the audit report. Especially at 3th party audits, this report has to be understandable for both reviewer and the client / customer.	Opportunity Identified
Nederland	CB 3	CB	Section 2	2.2 Level			Content Feedback	It seems like that international audits are only possible for the level of expert auditors. This may be too strict. For example: when based in Holland, a GLOBALG.A.P. auditor with the level "auditor" can perform an audit in Germany. Whether he or she may be capable of performing an auditor in for example a country outside the EU may be questionable.	Noted
Nederland	CB 3	CB	Section 2	2.1 Principles			Suggestion	It is now stated that the framework is based on professional development around a single food category. So for a single product type, all the levels should be go through. This may be difficult, at least it is expected that an expert who wants to audit another single category move easier to the levels.	Opportunity Identified
Nederland	CB 3	CB	Section 3	Matrix	Entry	Codex General Principles of Food Hygiene Or Equivalent,	Content Feedback	It seems like both entry level and novice auditor need basic knowledge. This is understandable. However, entry level needs * level 1, which isn't the case for a novice auditor.	Opportunity Identified
Nederland	CB 3	CB	Section 3	Matrix		Auditing training,	Suggestion	The difference in audit training for a novice and trainee auditor is understandable. But the added value of the detailed differences at the upcoming levels is questionable.	Opportunity Identified
Nederland	CB 3	CB	Section 3	Matrix		Codex General Principles of Food Hygiene Or Equivalent,	Suggestion	For the Codex General the feedback is the same as for the auditor training, is there an added value in making a difference for the different levels. All levels of auditor needs the basis knowledge of the Codex General	Noted
Nederland	CB 3	CB	Overall document				Suggestion	The document doesn't make a statement regarding the kind of companies audited. For example: a 3th party audit at a dairy factor with different processes and different products may need a higher level then a broker or transport audit at a company with only 2 trucks.	Opportunity Identified
Turkiye	CB 4	CB	Section 3	Matrix	Entry	Knowledge of Food Safety Principles,	Content Feedback	There doesn't seem to be much difference between an entry-level and a novice auditor. It's a bit concerning that an entry-level auditor can be a high school graduate and/or have no relation to the food industry	Opportunity Identified
Turkiye	CB 5	CB	Overall document				Suggestion	The framework has recognized the shortage of auditors and the inconsistency in their calibration within the field of food safety. Since it aims to standardize this globally and turn food safety auditing into a profession, it will provide a significant advantage in developing and expanding the pool of auditors. In this context, it is important not only to focus on developing auditors for high standards such as BRCS and IFS but also to build a system that includes internal auditors and third-party auditors. The step-by-step approach in setting education levels creates a process that supports the development of auditors starting from a basic level. This offers a major advantage in terms of increasing capacity and improving competence. Providing opportunities for all auditors to systematically stay up to date on global industry standards, technologies, and practices, and to develop professionally, will be a motivating process for auditors. Additionally, the most important feature of the framework is that it supports the development stages from internal auditors to third-party auditors, ensuring that individuals at different career stages, such as trainees and experts, can be calibrated under a specific structure. As you know, high standards like BRCS and IFS, which influence food safety, adopt a risk-based approach. The efforts made to instill this approach in every person within the auditor ranks will result in a better understanding of the standards. Although the framework's approach is generally positive, the most noticeable negative aspects are that it is not clearly stated how, where, and by whom the step-by-step training will be provided. It is unclear whether it will be delivered under a single umbrella or approved by multiple authorized organizations. Additionally, I have serious doubts about how long it will take to develop this framework and what its costs will be. The framework, which initially invites many people into such a system, will eventually lead to the narrowing of the pool through an elimination method. Individuals who may not succeed with a specific type of learning but could succeed with alternative learning methods will be eliminated. This could lead to both a loss of time and the exclusion of individuals who could actually become auditors from the system. It is uncertain whether a specific curriculum will be established. Since it is being addressed superficially, I have concerns about whether it can be an effective training. Moreover, each geographical region has different focuses, food chains, and global practices. Providing the same training and processes to all auditors globally seems inadequate in terms of gaining experience in these areas. Furthermore, having an elimination system at each stage may create difficulties in reaching the 'expert' level.	Opportunity Identified
Mexico	MAN 3	Manufacturer	Section 2	2.1 Principles			Suggestion	Why consider the legislative and regulatory framework at the specialised knowledge level? I would suggest to be part of the basics, since without the knowledge of the applicable regulation food manufacturers or caterers would not be able to operate.	Noted
Mexico	MAN 3	Manufacturer	Section 2	Figure			Content Feedback	Not all the information of each one of the sections of the circle can be seen, in some cases sentences are cut.	Opportunity Identified
Mexico	MAN 3	Manufacturer	Section 2	Matrix	Entry	Educational qualifications,	Suggestion	Consider that sometimes high school students are underage in some countries and that might represent a problem for any company even if they want to do an internship or similar. Would suggest to add at least the minimum legal age to work depending on the region.	Noted

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Mexico	MAN 3	Manufacturer	Section 3	Matrix	Auditor	Legislative and regulatory framework,	Content Feedback	Need to rethink about only setting one jurisdiction, since exporting to other countries is becoming a more common topic within the food industry, so that would imply the need to at least have an idea or be aware of other regulatory jurisdictions.	Noted
Mexico	MAN 3	Manufacturer	Section 4	4.1 Self Assessment			Content Feedback	Could be useful to define the scores for the self assessment where it can be applicable to assign the score/number, so that there can be an objective measure of the improvement and probably supported by a 360 evaluation.	Opportunity Identified
Mexico	MAN 3	Manufacturer	Section 4	4.1 Self Assessment			Content Feedback	At least set a yearly self-assessment revision.	Noted
Brazil	EDU 1	Education	Section 2	2.1 Principles			Suggestion	add remote audit knowledge	Noted
Brazil	EDU 1	Education	Section 3	Matrix	Auditor	Auditing Capability,	Suggestion	add remote audit knowledge	Noted
Brazil	EDU 1	Education	Section 3	Overall Section			Suggestion	It's important to prepare the auditor to deal with scenarios of global or regional pandemic, war, cyberattack and others disruption issues that don't allow auditors be in person at the facility. Here it goes an article about the remote audit in the COVID19 pandemic period I wrote : <a href="https://ojs.scientificmanagementjournal.com/ojs/index.php/smj/article/view/1011">https://ojs.scientificmanagementjournal.com/ojs/index.php/smj/article/view/1011</a> It's important to notice that CODEX/FAO, WTO and OECD are working to have remote audits protocols in place and I truly believe it should be considered.	Noted
Brazil	EDU 1	Education	Section 4	Overall Section			Suggestion	Create a routine of Expert Auditor do a technical review the finding of novice and new auditors. This way, they can be trained, assessed and gain deep knowledge of auditing protocols.	Noted
Japan	OTH 1	Other	Section 3	Matrix	Trainee	Educational qualifications,	Content Feedback	Add a period of the experiences and rewrite the requirements as "OR Relevant experience in the food related industry for at least five [5] years"	Noted
Japan	OTH 1	Other	Section 3	Matrix	Auditor	Educational qualifications,	Content Feedback	Add a period of the experiences and rewrite the requirements as "OR Relevant experience in the food related industry for at least five [5] years"	Noted
Japan	OTH 1	Other	Section 3	Matrix	Auditor Trainer	Educational qualifications,	Content Feedback	Add a period of the experiences and rewrite the requirements as "OR Relevant experience in the food related industry for at least five [5] years"	Noted
Japan	OTH 1	Other	Section 3	Matrix	Technical Expert	Educational qualifications,	Content Feedback	Add a period of the experiences and rewrite the requirements as "OR Relevant experience in the food related industry for at least five [5] years"	Noted
Brazil	OTH 2	Other	Section 1	1.2 Importance			Suggestion	Guidance and support are important to encourage professional progression, but it is not enough to enhance attractiveness of food safety auditor profession. The CB are the main stakeholders in this process, their role should be addressed as a complement of the framework.	Noted
Brazil	OTH 2	Other	Section 1	1.3 Intended Audience			Content Feedback	Maximize access to anyone with basic skills would have a negative impact in the quality of audit delivers. Most professionals under this profile that I have witnessed in the last 10 years as food safety auditor has difficulty in performing adequate audits due to the lack of food industry background. And the qualification process takes a long time so the result frequently is organizations dissatisfaction and / or renunciation by the new auditor.	Noted
Brazil	OTH 2	Other	Section 4	Overall Section			Suggestion	The self assessment sometimes is not enough to ensure progress, especially in case of an entry level auditor. Formal feedback from the CB would be crucial.	Opportunity Identified
Brazil	OTH 2	Other	Overall document				Suggestion	Food safety auditing is a very interesting activity, where the auditor can experience new process and meet interesting professionals, learning and teaching every day. My vision is that the profession is decadent because experienced auditors have low recognition, including low payment comparing to other food industry chain professionals of the same knowledge level, abilities and experience. Any initiative aiming to recognize food safety auditing a desirable career must include clear and regular feedback between auditor and CB, as well as recognition policies.	Noted
Brazil	CB 6	CB	Section 1	1.1 Background			Content Feedback	The context demonstrates in this topic shows that internal auditor is losing interest in working in this career. Some factors may be contributing to this, and you mentioned several relevant ones, but I would like to highlight two of them that you did not clearly mention in this topic, which are the low amount paid for auditors' fees, combined with this, the preparation of all the necessary documentation for a third-party audit takes more time than expected, giving the feeling of not being paid accordingly.	Opportunity Identified
Brazil	CB 6	CB	Section 2	Figure 3			Content Feedback	I found the cycle to be well designed and to provide a well-rounded approach to skills at each stage of the career. I really liked it.	Agreed
Brazil	CB 6	CB	Section 3	Matrix	Auditor Trainer	Legislative and regulatory framework,	Suggestion	I believe that the foundation could provide more training on legislation, using partnerships with experts around the world, to improve auditors' understanding of local legislation and legislation from other parts of the world, thereby calibrating auditors' interpretations of legal requirements	Opportunity Identified
Brazil	CB 6	CB	Section 4	4.2 Recommendation for Individuals			Content Feedback	I believe I would need to go into more detail about what this would be like to achieve proficiency in each phase.	Opportunity Identified
Brazil	CB 6	CB	Overall document				Suggestion	The initiative is very good and necessary to improve auditors' skills, but perhaps you could ask auditors or aspiring auditors directly about the reasons that would make them want to enter or continue in the career. Perhaps these answers would direct in more detail the contents to be covered in this framework or even in even more targeted proposals for this.	Opportunity Identified
Czech Republic	CB 7	CB	Section 3	Matrix	Entry	Codex General Principles of Food Hygiene Or Equivalent,	Suggestion	Regarding the Level 1 Food Hygiene or equivalence, it has not been described although it was double starred. In addition instead of Level 1 hygiene training a specific requirement with the requirements of the training should be given.	Opportunity Identified
Czech Republic	CB 7	CB	Overall document				Suggestion	Auditors are under pressure from several directions including Customer, being audited; Accreditation Body; Certification Body; Scheme owners. To lessen this pressure, will help auditors to make more efficient audits. Sincerely	Noted

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Israel	CB 8	CB	Section 1	1.3 Intended Audience			Suggestion	Since we are trying to learn and improve it is not just auditors but those with auditing experience of over X (5?) years. Not just food but also food packaging companies and auditors for packaging	Agreed
Israel	CB 8	CB	Section 2	Figure 1			Suggestion	Totally agree that it is attitudes and behaviours, Food quality culture.	Agreed
Israel	CB 8	CB	Section 2	2.1 Principles			Suggestion	For auditing training the basic principles are laid down in ISO/IEC 19011 this should be added to the text. Then on top of this basic can add HACCP, record keeping, CA, IA etc.	Noted
Israel	CB 8	CB	Section 2	2.1 Principles			Content Feedback	Examples of the food chain categories should include Packaging since it is different from all the foods.	Noted
Israel	CB 8	CB	Section 2	2.1 Principles			Suggestion	When referring to the legislative and regulatory elements though stated for single jurisdiction suggest to address secondary jurisdictions (where it is produced and sold to) for packaging for example there is the EU and the USA CFR as well as the Israeli legislation for migration)	Opportunity Identified
Israel	CB 8	CB	Section 3	Matrix	Auditor	Auditing training,	Content Feedback	lacking reference to the ongoing training as the matrix is for the initial recruitment.	Noted
Israel	CB 8	CB	Section 4	Overall Section			Content Feedback	Add to CPD activities must be "planned" recorded and monitored...	Opportunity Identified
Israel	CB 8	CB	Section 4	Overall Section			Content Feedback	what about effectiveness who evaluates the progress from stage to stage?	Opportunity Identified
Israel	CB 8	CB	Overall document				Suggestion	The document is very comprehensive and good however the GFSI is the umbrella organisation for not only food (manufactured) but also the grown produce in Global GAP the BRC standards for food and packaging. I do certification committee reviews for GGP, HACCP, FSSC 22000 and am a packaging auditor for BRCS and FSSC22000 the examples and the emphasis does not emphasize or bring sufficient examples from the other GFSI recognized schemes in my opinion	Opportunity Identified
Japan	CB 9	CB	Section 2	2.2 Level			Suggestion	The Auditor's education requirements are described on page 14, '3. Matrix', as follows. 'Degree or diploma in Food Sciences or other equivalent field OR Relevant experience in the food industry'. JIA-QA Center supports this content and requests that it is reflected in the revised 2024 benchmark requirements.	Opportunity Identified
United States of America	*NA	Education							NA
United States of America	CPO 1	CPO	Section 2	Figure 3			Content Feedback	The word progression within the outer circle seems disjointed in comparison to the inner 3 circles. Would suggest changing the outer circle to be Auditor Initiation > Auditor Trainee/Learner > Novice Auditor > Auditor > Technical Expert > Audit Team leader. Additionally, these terms better align with the definitions on page 13.	Opportunity Identified
United States of America	CPO 1	CPO	Section 2	2.1 Principles			Content Feedback	Within the educational qualifications & educational background, there should be specific educational components identified, such as sampling plans and statistical justification (or educational background with mathematics in or exceeding statistics), soil leaching and environmental hazards (or education in agricultural science), microbiological contamination (or education in bioscience), chemical safety and contamination (or education in chemistry), etc. because these are more universal than a bachelor's degree. Additionally, if a person who has several years of work experience and may not have the exact bachelor's degree but displays a lot of technical competence this provides an avenue for that auditor to seek training/refresher training that is much more job focused vs just a college credit.	Opportunity Identified
United States of America	CPO 1	CPO	Section 2	2.2 Levels			Content Feedback	It would be helpful to add the level (i.e. A-E) at which the individual would be able to audit. Based on the description it seems like the person would be able to start with supervised audits or be part of and audit team at level C and then conduct solo audits at level D or higher.	Opportunity Identified
United States of America	CPO 1	CPO	Section 3	Matrix		Educational qualifications,	Content Feedback	Across the entire row the diploma in Food Science or other equivalent field or relevant experience in the food industry is very broad and up to interpretation debate because there are several quality and food safety skills that are transferable from GFSI scope to scope. Additionally, experience within cosmetics, pharmaceutical, and medical device audit experience provides an auditor with many transferable skills to be an auditor within Food if there are additional educational components that are achieved. As an example, a medical device auditor probably will not have much education/experience/training on soil leaching and environmental hazards, but this could be education from an Audit Team Leader/Trainer or other reputable training organization that they receive outside of a college or university degree to help them fill the gap.	Opportunity Identified
United States of America	CPO 1	CPO	Overall document				Suggestion	Overall I like the direction of the document and the concepts that are outlined throughout and think that there are a few areas that need to be refined as it relates to auditor education and training to really strengthen the document.	Opportunity Identified
Chile	MAN 4	Manufacturer	Section 1	Overall			Content Feedback	Agree	Agreed
Chile	MAN 4	Manufacturer	Section 2	Overall			Content Feedback	Agree	Agreed
Chile	MAN 4	Manufacturer	Section 4	Overall			Content Feedback	Agree	Agreed
Chile	MAN 4	Manufacturer	Section 5	Overall			Content Feedback	Agree	Agreed
Chile	MAN 4	Manufacturer	Overall document				Suggestion	Good Job	Agreed

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France	MAN 5	Manufacturer	Section 2	Figure 2			Content Feedback	This figure is a key point : effectiveness of FSA comes 1st from his expertise based on his experience, skills continuous acquisition, competencies continuous building	Agreed
France	MAN 5	Manufacturer	Section 5	Example 1			Content Feedback	Do not understand how a trainee level and auditor level can be immediately considered as Expert level in audit delivery ? Should be relevant that level of Audit "delivery" (means also effectiveness) is highly linked to level of specialized knowledge and food safety principles as we talk about FSA	Noted
France	MAN 5	Manufacturer	Section 5	Example 2			Content Feedback	Do not understand how a trainee level and auditor level can be immediately considered as Expert level in audit delivery ? Should be relevant that level of Audit "delivery" (means also effectiveness) is highly linked to level of specialized knowledge and food safety principles as we talk about FSA	Noted
France	MAN 5	Manufacturer	Section 5	Example 4			Content Feedback	Difficult to figure switch from meat to ready-to eat category is Expert Auditor - Eg. FSA auditor experienced in meat field is not immediately perceived as an expert in the field of dairy	Noted
Chile	NGO 2	NGO's/IGO's	Section 1	Overall			Content Feedback	Excellent	Agreed
Chile	NGO 2	NGO's/IGO's	Section 3	Matrix	Auditor	Food Chain Categories,	Content Feedback	guardian of independence, influencing policies and standards that safeguard the impartiality of the audit process" LOVE	Agreed
Chile	NGO 2	NGO's/IGO's	Section 4	Overall			Suggestion	Centralizing the various standard certifications in a single course, this provides added value to the professional and the market.	Noted
Chile	NGO 2	NGO's/IGO's	Section 5	Overall			Content Feedback	Excellent examples	Agreed
Chile	NGO 2	NGO's/IGO's	Overall document				Suggestion	Without a doubt, Food Safety Auditor Professional Development Framework. It will be a before and after for the auditors and thank you GFSI for this backing and support.	Agreed
Brazil	TP 1	Training Provider	Section 1	Overall			Suggestion	Although the introduction presents a strategic view of the problem and the proposed solutions, there is a lack of practical examples or concrete references of how these changes would impact the reality of day-to-day audits. Limited Exploration of Technological Challenges: The document mentions the importance of preparing auditors for the future, but the introduction could expand more on what innovative technologies and practices should be adopted and how this would affect food safety audits.	Opportunity Identified
Brazil	TP 1	Training Provider	Section 2	Overall			Content Feedback	The modular structure allows the document to be easily navigable, both for beginner readers and those with more experience in the area. The inclusion of examples at the end also helps to give a practical touch to the theoretical content.	Agreed
Brazil	TP 1	Training Provider	Section 2	Overall			Suggestion	Point for Improvement: Despite the wealth of details, the matrix could be accompanied by a step-by-step example of how an auditor could use the table to plan their career, especially at the beginning of training.	Opportunity Identified
Brazil	TP 1	Training Provider	Overall document				Suggestion	Aspects for Improvement: Lack of Specificity in the Training Curriculum: Although the framework highlights the importance of professional development, it does not detail the training curriculum necessary for progress between levels. The inclusion of a clearer training roadmap, with suggested modules or certifications, could improve auditors' career planning.	Opportunity Identified
Brazil	TP 1	Training Provider	Overall document				Suggestion	Little Detail on Emerging Technologies: The framework mentions the importance of "futureproofing" and adapting to new technologies, but could offer more details on how to prepare auditors for emerging technologies in the food industry, such as automation and digital tools.	Noted
Brazil	TP 1	Training Provider	Overall document				Suggestion	Dependence on Self-Assessment: The self-assessment process can be subjective, especially for auditors at more entry-level levels. It would be useful to include more objective assessment tools or suggestions on how managers can collaborate in the assessment process.	Opportunity Identified
Brazil	TP 1	Training Provider	Overall document				Suggestion	Involvement of Regulatory Entities: Despite mentioning that regulatory agencies can use the framework to establish competency requirements, it would be useful to see more concrete examples of how this can be implemented collaboratively with these entities, strengthening the credibility of the framework.	Noted
Brazil	TP 1	Training Provider	Overall document				Suggestion	More Practical Application Details: Although example implementation scenarios are provided, these are somewhat generic. The document could benefit from more detailed case studies, which show the impact of applying the framework in practice, especially in complex audits.	Opportunity Identified
Brazil	CB 10	CB	Section 1	1.2 Importance			Suggestion	Technical training for auditors and CB has great opportunity for improvement.	Agreed
Brazil	CB 10	CB	Section 2	2.1 Principles			Suggestion	Greater interaction between auditors with exchanges of experiences.	Opportunity Identified
Brazil	CB 10	CB	Section 3	Matrix	Trainee	Specialised Knowledge,	Suggestion	New auditors do not have support from specialists. There is no feedback for the auditor to know whether there is technically progress in their journey.	Opportunity Identified
Brazil	CB 10	CB	Section 4	4.1 Self assessment			Suggestion	Auditors must undergo technical feedback to self-evaluate	Opportunity Identified
Brazil	*NA	Manufacturer							NA
Nederland	*NA	Other							NA
Nederland	*NA	Other							NA
Uruguay	AB 1	AB	Overall document				Suggestion	I think the document is very good and usefull	Agreed
Mexico	*NA	Training Provider							NA
Greece	*NA	Other							NA

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Espanya	CB 12	CB	Section 1	Overall Section			Content Feedback	Regarding third-party audits.Regarding first and second party audits, I wonder if GFSI has considered the impact on its reputation if it directly validates auditors. Right now, in case of bad practices, the impact falls on the auditor/contracting body; but if GFSI recognizes the auditor directly, any scandal will damage GFSI. Does or will GFSI have control mechanisms to monitor the integrity of auditors and contracting organizations (not necessarily certification bodies with a culture of integrity and a reputation to protect in order to safeguard the business)?, for this proposal to be valid, it is necessary that the program owners accept the auditor's validation for their standards, both for the initial qualification and for the qualification maintenance. Otherwise, it will only be an additional cost for auditors (especially freelancers) and certification entities.	Noted
Espanya	CB12	CB	Section 3	Matrix	Entry	Technical Aspect of Food Safety,	Content Feedback	Regarding the progress of auditors, how would this be structured? After a certain number of audits, could a person without technical training be considered equivalent to a university-trained technician? Would this improve the quality of food safety auditors?	Noted
Chile	TP 2	Training Provider	Section 1	1.2 Importance			Content Feedback	HII I a little do miss concepts Such as: Strategic thinking; business; lot of auditors are so "operational" and do not manage the Macro View, the Strategic and business view. Also: "Business" Risk. Executive style of writing reports!!!	Noted
United Kingdom	FS 2	Food Service	Section 2	Overall Section			Suggestion	I wonder if we should exercise some restraint in the complexity of the language used to support understanding of the core message and to support with language translation. Sentences like: "The process of audit delivery is not strictly linear but rather a dynamic and holistic journey. It involves the continuous acquisition and integration of various dimensions" do little to support understanding of the key messages and potentially overcomplicate the document.	Opportunity Identified
United Kingdom	FS 2	Food Service	Section 2	Figure 3			Suggestion	I wonder if it helps manage expectations by included a guideline on how long this development process might take? To move from an 'Entry Level' auditor to an 'Audit team Leader' can be a career of decades. How can we provide some indicative guidance on how long auditor development might take	Opportunity Identified
United Kingdom	FS 2	Food Service	Section 3	Matrix		Educational qualifications,	Content Feedback	Encouraging that you have called out relevant industry experience as a replacement for the need for a degree. But 'Relevant' needs to be better defined. Is it length of time in the industry? Is it level of role in the industry? How can we better support with benchmarking of 'relevant' experience	Opportunity Identified
United Kingdom	FS 2	Food Service	Section 3	Overall Section			Suggestion	Could you include examples on how an auditor might demonstrate competencies. For example, in stakeholder requirements, a Technical expert is considered someone who is a "Recognised expert in understanding stakeholder requirements" - How might an auditor demonstrate this? This applies to all sections in the matrix	Opportunity Identified
United Kingdom	FS 2	Food Service	Overall document				Suggestion	I think this goes a long way to demonstrate the development of auditors and how this program might help drive consistency and quality into auditing - a key topic. I think though there is still some work to do on how we stem the flow of auditors leaving the industry and encourage new auditors in.	Noted
Mexico	*NA	Manufacturer							NA
India	CB 13	CB	Section 1	Overall Section			Content Feedback	Excellent to improve core competence n horizontal deployment across team members	Agreed
India	CB 13	CB	Section 2	Overall Section			Content Feedback	Excellent	Agreed
India	CB 13	CB	Section 3	Overall Section			Content Feedback	Excellent	Agreed
India	CB 13	CB	Section 4	Overall Section			Content Feedback	Excellent	Agreed
India	CB 13	CB	Section 5	Overall Section			Content Feedback	Excellent	Agreed
India	CB 13	CB	Appendix	Overall Section			Content Feedback	Good approach	Agreed
India	*NA	Manufacturer							NA
Sénégal	OTH 3	Other	Section 1	Overall Section			Content Feedback	I would like to learn about safety	Noted
Global	CB 14	CB	Section 1	1.1. Background			Suggestion	Suggest considering include harmonization of the requirements across the food schemes to ensure simplification and elimination of duplication. (e.g. witness equivalence between the GFSI Schemes, database completion).	Noted
Global	CB 14	CB	Section 1	1.3 Intended Audience			Suggestion	• Consider including interested parties responsible for guiding and upskilling potential FSA also in the intended audience. Examples include academic and training institutes offering Food safety programs, industry role players (manufacturing and supply chain partners, retailers, food service companies) certification and verification bodies employing FSA and industry bodies (ex. Codex Alimentarius) to ensure harmonized acceptance of the PD Framework. • Professionals in the food industry – Suggest revised wording as follows: “Individuals involved in independent inspection, consulting and advisory roles in food safety system life cycles can utilize the framework to benchmark skills and competence and to identify areas for professional development relevant to their industry.” • Site managers – Suggest alternative term: “Food safety managers”	Opportunity Identified
Global	CB 14	CB	Section 2	Overall section			Suggestion	Figure 3 – Technical expert: Suggest alternative term “Subject matter expert”, as the implied role is that of an expert of both auditing and technical food safety capabilities, whereas a Technical expert (currently in use in auditing industry) may often be only a person with technical process knowledge, but not necessarily food safety auditing skills and knowledge. It may cause confusion between the 2 functions to use this term.	Opportunity Identified

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Global	CB 14	CB	Section 2	Overall section			Content Feedback	Comment about Dimension 02: Will GFSI replace all Scheme Owner Platforms by unique platform to centralize the information related to auditor and follow the classification suggested in figure 3? This is an excellent opportunity to eliminate the current duplication in place across all Schemes. This would save time from all parties which could be used to support the Schemes growth.	Opportunity Identified
Global	CB 14	CB	Section 2	Overall section			Content Feedback	Figure no. 3 Overview of the Food Safety Auditor Professional Development Framework has technical expert placed in the left side of the circle under Auditing capabilities. Whereas, in my suggest this should have been placed in the right side of the circle, much relevant under technical aspect of food safety. A technical expert is just teamed to support the lead auditor with regards to the missing necessary competence required for an audit delivery as per approved and his sole role is to provide technical support to the Audit team/ lead auditor. Technical experts even do not contribute to audit duration. He/she necessarily does not need to have auditing background as in no ways he/she is demonstrating auditing capabilities. Hence this suggest.	Opportunity Identified
Global	CB 14	CB	Section 2	2.1. Principles			Content Feedback	"Auditing training" should be under "Principles of auditing" instead of in "Knowledge of Food safety Principles"	Noted
Global	CB 14	CB	Section 2	2.2 Levels			Suggestion	Level A & B to be combined into 1 level – it will create confusion, as the difference in experience is minimal. Suggest having the following: Entry level trainee auditor, Trainee auditor, Auditor, Lead Auditor. The role of Technical expert is not necessarily different from that of Auditor or Lead auditor, but in practice, might be assigned to a non-auditing team member (SME). Suggest to remove it from the levels, as it will create confusion on the role of TE. For the 6 levels of auditor described, what would be the suggested approach for the Scheme Owner regarding the use of the auditors residing in another level that is not lead? CB's will have to use those definitions to identify each type of auditor? Suggest not as this would be create a huge admin backlog to all CBs Suggest changing the technical expert wording (figure 3) as will create confusion with the usual technical expert role already used when an expert needs to attend the audit to support the audit team Suggest reducing levels and not consider Level A (Entry level auditor) and B (Novice auditor). Individuals at the start of their career and individuals with little expertise needs to gain more expertise to start training process, as a trainee auditor. If CB 's need to identify and approve individuals in the beginning of the career, this will have a big impact in operation and to complete process until be qualified as a lead auditor can take a long time. Figure 3 is considering 6 levels. However, "Audit Team leader/ trainer" is not considered as letter "F" in the topic 2.2. From what I understood from document (letter E) "Technical Expert" level can act as an Auditor AND/ OR Audit Team leader? Not sure why this level is necessary and this wording "Technical Expert" can cause confusion related to usual technical expert role already used.	Opportunity Identified
Global	CB 14	CB	Section 2	2.2 Levels			Content Feedback	In continuation to above content over T.E, in section 2.2 frameworks says- The individual has an intuitive grasp of this area of competence and requires no supervision other than governance. Further it says that They may also be capable of serving as an audit team leader or trainer. Comment:- They may be capable of serving as TL, if they carry necessary auditing skills / capabilities. But then they will no longer be named as T.E. P.S:- the role of T.E requires both supervision as well as governance.	Noted
Global	CB 14	CB	Section 3	Matrix		Knowledge of Food Safety Principles	Suggestion	Matrix – A Even if its entry level auditor- Diploma in food science/ technology should be must . Instead of simply saying reading or writing skills, understanding food terminology should be focus. Sufficient experience- should be quantified, be it trainee auditor or auditor . Same way In depth knowledge mentioned for technical expert and expert auditor should be made clear/or quantified for clarity. Suggest quantifying relevant experience in the food industry equivalent to a degree or diploma – how many years and in what specific areas in the food industry? Suggest quantifying "sufficient" , "in-depth" and "advanced depth "experience in food chain categories and auditing training to ensure consistent and harmonized interpretation between implementers, such as scheme owners. Suggest including more detailed information to allow harmonization across all GFSI Schemes and also to ensure all CBs will access the competency at the same way. Example: è education à which ones will be acceptable for each scope? è Basic and advance knowledge à what is a basic and advance knowledge? If this is not standardized Scheme Owners and CBs will not operate harmonized. In addition, how classify "In-depth experience" and "advanced depth of knowledge"?	Noted
Global	CB 14	CB	Section 3	Matrix		Specialised Knowledge	Suggestion	Clearer definitions of the different levels of experience – same comment as above. Same as above – the requirements should be in a way to ensure harmonization and standardization during the assessment of the auditor competency	Noted
Global	CB 14	CB	Section 3	Matrix		Principles of Auditing	Content Feedback	Principles of auditing – it will be very difficult to monitor and map these levels practically – also auditors are often in the roles responsible for setting ethical conduct and impartiality and independence policies and guidelines, but rather abiding by them consistently. These are set by CB's and inspection bodies in alignment with accreditation and ' or scheme owner standards. Consider rewording the levels of experience in the principles of auditing section. Same as above – the requirements should be in a way to ensure harmonization and standardization during the assessment of the auditor competency How can CBs demonstrate differences between levels? For example, difference between "consistently demonstrates ethical leadership" from "acts as a trusted ethical advisor and thought leader"?	Opportunity Identified



Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Global	CB 14	CB	Section 3	Matrix		Auditing Capability	Suggestion	• Also just requiring clearer mapping of differences between practical mapping of audit delivery experience. Ex. "Avoids biases and ensures truthful reports" mean the same as "strives for clarity" – these terms are very open for interpretation. Clearer auditing specific terms to be utilized. • Evidence based approach should focus on how much guidance is given to the auditor – ex Entry level auditors should be able to confirm evidence based on specific parameters provided on a checklist Expert level auditors should be able to gather appropriate, relevant evidence without further guidance, and taking a risk-based approach through vertical and horizontal evaluation to assess overall compliance against standards without the use of checklists. Same as above – the requirements should be in a way to ensure harmonization and standardization during the assessment of the auditor competency Same as above - How can CBs demonstrate differences between levels?	Opportunity Identified
Global	CB 14	CB	Section 3	Overall Section	Entry		Suggestion	General report writing skills are influenced by experience in system development, research papers and general writing, which plays a huge role in auditor's development of accurate, concise, factual report writing, this should be considered to be added as a specific skill or detailed under communication.	Noted
Global	CB 14	CB	Section 4	4.2 Recommendation for Individuals			Suggestion	Suggest amendment of the following: " There are no set metrics for how often a skill must be demonstrated to classify yourself at a certain level, however the level of skill, knowledge and practical experience of within the framework matrix must be substantiated by evidence to support a classification within a specific level!"	Noted
Global	CB 14	CB	Overall document				Suggestion	The intention of the framework is good, however clearer terminology should be used to distinguish between levels of expertise / experience in the different areas of the matrix, as the current terms are too open for interpretation. Too many grades of auditors, can be reduced to less. General report writing skills are influenced by experience in system development, research papers and general writing, which plays a huge role in auditor's development of accurate, concise, factual report writing, this should be considered to be added as a specific skill or detailed under communication. Acknowledgement and maintenance of lead auditor status (expert auditor level) should not solely be based on active auditing or witness audits but should allow for evaluations based on mentorship and training of incoming auditors, technical reviewer capabilities and involvement in the field of auditing, other than active auditing roles. This will facilitate experienced expert auditors to remain in the field of auditing, whilst diversifying their other areas of skill and interest as opposed to all in or all out approach currently taken.	Opportunity Identified
Canada	RET 1	Retailer	Section 1	1.1. Background			Suggestion	The introduction provides a good, detailed overview of the challenges and scope of the framework. Would suggest including the definition of "audit" which is referenced in the glossary as this helps to set the expectations. Additionally consider further the revised General Principles for Food Hygiene which now includes "Fundamental to the successful functioning of any food hygiene system is the establishment and maintenance of a positive food safety culture acknowledging the importance of human behaviour in providing safe and suitable food" and the necessity of auditors to be able to assess behaviours towards food safety during an audit.	Opportunity Identified
Canada	RET 1	Retailer	Section 2	Overall section			Suggestion	Suggest providing detail on equivalence to the Codex General Principles of Food Hygiene. If the intent is to grow the auditor pool with resource not traditionally employed in the food industry it would be beneficial to provide some information on what might be deemed as equivalent.	Opportunity Identified
Canada	RET 1	Retailer	Section 2	2.2 Levels			Suggestion	Reading the criteria, I feel the levels would benefit from some reference to practical knowledge or experience working in a food safety role. Additionally, it may be beneficial to include direction to read/refer to the matrix in section 3 to read in conjunction with section 2 to ensure alignment and enhance understanding from some of the terminology. Entry Level auditor Intended for individuals at the start of their career perhaps include "career in food safety" else the descriptor could refer to anyone in any industry or is that the intent? Novice auditor "Little or no expertise in this area of competence" would be helpful to understand the "area" which is being referred, assume it is the matrix in section 3? Trainee auditor Would suggest that this requires some relevant training rather than "may" have undergone training to demonstrate some commitment to the "trainee" level. If practical experience should there be reference to food safety management here as "practical experience" – significant gap in the current auditor pool which become qualified by completing a 2-day HACCP course. Auditor Suggest substituting "unusual" with uncommon or exceptional Audit Team leader/trainer Suggest for consistency with D, remove the term "unusual". In terms of "wealth of experience" could there be an inclusion specifying "food safety management experience"?	Opportunity Identified
Canada	RET 1	Retailer	Section 2	Figure 3			Suggestion	Although figure 3 indicates the expectations for the various suggested, the expectations and additional figure breaking down more the requirements for 1st and 2nd party auditors would be helpful to support the intended career pathing ability intended by the framework.	Opportunity Identified
Canada	RET 1	Retailer	Section 3	Matrix		Technical Aspect of Food Safety	Suggestion	Would be beneficial to include examples to "Equivalency to Codex" as not all regions will understand the reference to Codex, would suggest specifying "food safety" throughout the document to reinforce the expectation and provide direction.	Opportunity Identified
Canada	RET 1	Retailer	Section 3	Matrix		Auditing training	Content Feedback	I cannot see any requirement for specific auditor training in the matrix at any level within the "Auditor Training" section, is this a miss or an intent?	Noted
Canada	RET 1	Retailer	Section 3	Matrix		Food Chain Categories	Suggestion	Descriptor for food chain categories is wordy across all levels, suggest a revisit and some simplification.	Opportunity Identified
Canada	RET 1	Retailer	Section 3	Matrix		Stakeholder requirements	Suggestion	the matrix would benefit from recognition for a 1st/2nd party food safety auditor, this seems to be lacking from the matrix. Inclusion would help with clarity of auditor career pathing, suggest this is indicted in a clear manner to facilitate engagement from those only wishing to achieve those levels of auditing, not everyone would want to become a 3rd party auditor.	Noted

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Canada	RET 1	Retailer	Section 3	Matrix		Codex General Principles of Food Hygiene Or Equivalent	Suggestion	The ability to audit behaviours is essential and currently mostly overlooked during food safety audits due to the perceived subjective nature of the approach. General Principal for Food Hygiene now specifically mentions the importance of behaviours which are now being evaluated during regulatory inspections however this seems to be overlooked in the matrix.	Noted
Canada	RET 1	Retailer	Section 3	Overall Section			Suggestion	Appreciate the matrix is not intended to specify the how but without providing more specific and directive expectations the subjective nature of some the criteria is open to manipulation.	Noted
Canada	RET 1	Retailer	Section 3	Matrix	Entry Level Auditor	N/A	Content Feedback	*Level 1 Food hygiene or equivalence needs to either be removed or explained further, this term is not consistently used globally. Unsure of the overall value of this level, suggest collapsing and starting with the Novice level. The detail overall for this level is too generic and could almost apply to anyone in any industry, little value from this level.	Opportunity Identified
Canada	RET 1	Retailer	Section 3	Matrix	Novice Auditor	N/A	Suggestion	Overall, I feel the criteria is applicable, with the interpretation that theoretical understanding is required at this level. Reference to "Begins to recognise and document potential risks during the audit process" would suggests audits are now being completed, is this correct? If that is the intent perhaps make this more evident for this level, 1st party audits or perhaps at least documented inspections etc. If the intent is not for the Novice Auditor to audit/inspect then perhaps this sentence needs to be reworded.	Opportunity Identified
Canada	RET 1	Retailer	Section 3	Matrix	Trainee Auditor	Auditing training	Suggestion	I believe at this level the individual should have started auditing under supervision, unclear whether this is a requirement or not from the descriptors.	Opportunity Identified
Canada	RET 1	Retailer	Section 3	Matrix	Auditor	N/A	Suggestion	This would appear to be the level to attain for those conducting audits against GFSI recognized standards – to be recognized as an internal food safety auditor, would this be the same level which is to be achieved? Evidence based knowledge with practical experiential learning from implementation of Codex General Principles of Food Hygiene the reference to "practical experiential "is a significant improvement and much needed inclusion at this level, may need to include food safety management or what the equivalence is to ensure clarity of the expectation. Caution that without specifying a time frame for length of experience there may be some workarounds to advance people through the process. Currently some significantly poor audits with the 2 years experience which has been allowed previously, however hopefully the specificity of experience with food safety will resolve this current gap.	Opportunity Identified
Canada	RET 1	Retailer	Section 3	Matrix	Technical Expert	N/A	Suggestion	Significant reference to "advanced depth of knowledge and understanding" throughout the criteria for Technical Expert, would suggest more description is necessary to differentiate from Auditor level and what the term advanced might mean.	Opportunity Identified
Canada	RET 1	Retailer	Section 4	4.2 Recommendation for Individuals			Suggestion	I appreciate that mention has been made of the requirement for CPD activities to be recorded and monitored, would suggest providing some examples of good practice and clear expectations for recording. Mention that "Maintaining a well-organised portfolio would be beneficial" would suggest this is included as a minimum and not just a suggestion. A detailed audit log should also be maintained to demonstrate the auditors career growth from internal audit to 3rd party auditor.	Opportunity Identified
Canada	RET 1	Retailer	Section 5	Overall section			Suggestion	The examples are mostly detailed and provide some good guidance for the reader, suggest reconsidering example 5 on the agency worker – suggest a different approach for this example, perhaps consider using someone from a function not generally considered for auditing – maintenance or hygiene personnel on the HACCP/Food Safety team perhaps?. I think the section could be improved by considering the following; • Providing an example for an individual without industry experience but with just the educational background • More clarity on the understanding of food safety and the need to experiential learning as listed in the matrix • Ability to have the confidence to evaluate competence and behaviours, this appears to be lacking	Opportunity Identified
Canada	RET 1	Retailer	Appendix	Appendix 1			Suggestion	Suggest further review in conjunction with the Auditor Training and Professional Development (ATPD) Review of Related Professional Development Schemes document which was commissioned previously by GFSI with consideration to the references which have been considered and discussed previously.	Noted
Canada	RET 1	Retailer	Overall document				Suggestion	Has an evaluation been completed of the actual issues with the auditing process? Mostly we continue to hear anecdotal information with little specifics. What is specifically is the ATPD framework attempting to solve and has this been considered in the development of the framework - facts rather than hearsay.	Noted
Japan	LG 1	LG	Section 1	1.3 Intended Audience			Content Feedback	I fully support the funnel approach. People can be outstanding auditors without relevant degrees.	Agreed
Japan	LG 1	LG	Section 2	Figure 3			Suggestion	This figure might have people misunderstand that auditing capabilities are necessary after becoming 'Auditor'. Figure 3 could be deleted as people can see the detail in the matrix.	Opportunity Identified
Japan	LG 1	LG	Section 3	Matrix	Entry Level Auditor	Codex General Principles of Food Hygiene Or Equivalent	Suggestion	'Level 1' needs explanation. It seems to refer to a specific training programme.	Opportunity Identified
Japan	LG 1	LG	Overall document				Suggestion	Please allow me one comment for Phase 2. If the Employment Verification Letter would be considered for the evaluation tool, please remember that some Japanese companies never issue it. It is not business practice in Japan.	Opportunity Identified
Canada	TA 1	Trade Association	Section 1	1.3 Intended Audience			Suggestion	Should this cohort also be used as trainers for those coming into the field.	Noted
Canada	TA 1	Trade Association	Section 1	1.3 Intended Audience			Content Feedback	It would be a very steep learning curve for fresh graduates to jump into this process. There needs to be some work experience to compliment the academic knowledge.	Noted
Canada	TA 1	Trade Association	Section 1	1.3 Intended Audience			Content Feedback	Whose fs auditors? Government employees or private entities?	Noted
Canada	TA 1	Trade Association	Section 2	2.1. Principles			Content Feedback	The framework does not address how the current deficit of auditors can be increased in a timely manner.	Noted

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Canada	TA 1	Trade Association	Section 2	2.1. Principles			Content Feedback	This category is very important for auditors engaged in primary production audits. There needs to be a familiarity with these environments as they can vary greatly but still produce similar commodities.	Noted
Canada	TA 1	Trade Association	Section 2	2.1. Principles			Content Feedback	Auditors should not be recommending improvements especially as they relate to judicial requirements.	Opportunity Identified
Canada	TA 1	Trade Association	Section 2	2.2 Levels			Content Feedback	This level is unnecessary as the individuals would likely be lacking the education and/or experiential knowledge required.	Opportunity Identified
Canada	TA 1	Trade Association	Section 2	2.2 Levels			Content Feedback	If this area is primary production, an individual at this level needs to have preexisting experience working in this environment.	Noted
Canada	TA 1	Trade Association	Section 3	Matrix	Entry Level Auditor	N/A	Suggestion	This level is too inexperienced, academic & real world, to be considered.	Noted
Canada	TA 1	Trade Association	Section 4	Overall section			Content Feedback	Who is paying for this? Is it up to the auditor or would there be a mechanism created to offset the costs?	Noted
Canada	TA 1	Trade Association	Section 4	Overall section			Suggestion	A set of metrics needs to be developed which can be used to "benchmark" an auditors progress. Who will set these and how will achievement of the metrics be recognized.	Opportunity Identified
Canada	TA 1	Trade Association	Section 4	Overall section			Content Feedback	Auditors will need to be provided with set objectives and examples of how they can be met. It can't be left completely up to the individual.	Opportunity Identified
Canada	TA 1	Trade Association	Section 4	Overall section			Content Feedback	Who is responsible for "monitoring"? GFSI, CPO, other.	Opportunity Identified
Canada	TA 1	Trade Association	Section 4	4.1. Self-assessment			Content Feedback	Similar to above, who and how is self-assessment monitored. What are the universal targets / milestones that ensures auditors are being rated based on a level playing field.	Opportunity Identified
Belgium	OTH 4	Other	Section 1	1.1. Background			Content Feedback	The current challenge is well described but misses some key considerations such as 3rd party certification became commercial and misses the initial goal which was to improve food safety. The auditor part is only one piece of the puzzle. There is an elephant in the room for which a holistic approach needs to be taken. GFSI has to play its role, reinforce governance and protects its own brand.	Noted
Belgium	OTH 4	Other	Section 1	1.3 Intended Audience			Suggestion	Publishing such framework will only help if GFSI sets governance around it and details an implementation plan together with stakeholders. The risk is to see this document published and not being used. An action plan is needed.	Noted
Belgium	OTH 4	Other	Section 2	2.2 Levels			Suggestion	Merge entry level and novice levels. The matrix makes very little difference between the two e.g. what is the difference between basic awareness and basic knowledge. I see an opportunity to simplify the framework. I suggest 4 levels only by removing the technical expert also	Noted
Belgium	OTH 4	Other	Overall document				Suggestion	This framework is a good start but will not be the magic solution to attract and develop auditors. There is a need to make the audit function more attractive by making it a meaningful job that drives continuous improvement. It became a compliance job only and auditors spend too much time reporting instead of auditing. The latter triggered by the overwhelming requirements of scheme owners and accreditation bodies.	Noted
Belgium	OTH 5	Other	Section 1	1.2 Importance			Content Feedback	In general, it was not clear to me how the framework will enhance the attractiveness of the profession. A bit more explanation on how the framework aims to enhance the attractiveness would help.	Noted
Belgium	OTH 5	Other	Section 1	1.3 Intended Audience			Content Feedback	There is a statement for teh site managers: they can leverage the framework to assess the competency of the internal and external auditors. It is not clear to me how this assessment will be possible for external auditors i.e. 3rd party audtors auditing the site for the certification audit.	Noted
Belgium	OTH 5	Other	Section 2	2.2 Levels			Content Feedback	It is not super clear for me what is the real difference between the entry level auditor and the novice auditor. I wouls uggest avoiding statements like: no expertise in this area of competence. Which competence are we talking about here? Auditing, applying the food safety knowledge into the work?	Noted
Belgium	OTH 5	Other	Section 3	Matrix	Novice Auditor	Educational qualifications	Content Feedback	The novice auditors are the ones with secondary education or preparing for a degree in food science as I read the table. They are also preparing to specialise in one category as per the information provided thourgh the food chain categories. Isn't this conflicting as specializing in an area first will need a certain level of knowledge and understanding?	Noted
Belgium	OTH 5	Other			Auditor	Codex General Principles of Food Hygiene Or Equivalent	Suggestion	I suggest adding information on what kind of evidence will be required for the statement: Evidence-based knowledge	Noted
Belgium	OTH 5	Other	Section 3	Overall Section			Suggestion	I am not sure what different colors of gray mean. I think a clarification will help. As mentioned in my previous comments, the difference between an entry-level and a novice auditor needed to be clarified; therefore, reading the matrix for those was not easy either. I suggest providing some examples to describe the real difference	Noted
Belgium	OTH 5	Other	Section 5	Overall section			Content Feedback	Exmpales are not easy to understand in general. Please see my comment below for Example 2, as an example.	Opportunity Identified
Belgium	OTH 5	Other	Section 5	Example 2			Content Feedback	An IT auditor with no knowledge of food safety principles would most probably be sn teh process of preparing to specialize in one category, or have a basic understanding of food law.	Noted
Brazil	TP 3	Training Provider	Section 1	1.3 Intended Audience			Content Feedback	Have a highly generic professional base, without specific knowledge in the area of food or related areas could have a major negative impact on the formation of auditors as a lack of technical knowledge can result in superficial audits or take too long to train the new auditor, generating dissatisfaction and even giving up his career as an auditor. Experience or training would be recommended in the area.	Noted
Brazil	TP 3	Training Provider	Section 3	Matrix	Entry Level Auditor	Technical Aspect of Food Safety	Suggestion	Entry-level auditor – having a basic knowledge of legislation is essential to start a good audit. The auditor may not have experience or knowledge in the area, but Minimally knowing the legislation allows for an audit with a foundation technical.	Noted

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Brazil	TP 3	Training Provider	Section 3	Overall Section			Suggestion	Encouraging the autonomous development of professionals is important, but merely providing structure and support does not make the profession attractive. The initiative should include standards, actions, and commitment from other stakeholders	Opportunity Identified
Canada	TA 2	Trade Association	Section 1	Overall section			Content Feedback	Has it been considered that: There is a clear statement of the problem (i.e. shortage of auditors, auditor consistency). The Framework does not, however, clearly explain how the Framework will address this.	Noted
Canada	TA 2	Trade Association	Section 1	Figure 1			Content Feedback	Has it been considered that: The Framework appears introduce increased complexity into the process of qualifying auditors with the required competence to perform GFSI audits.	Noted
Canada	TA 2	Trade Association	Section 2	Overall section			Content Feedback	Has it been considered that: Rather than attracting auditors, GFSI's "work to develop a professional development framework for food safety auditors" may make auditing a less attractive career option and increase the current (not looming) shortage of auditors by adding unnecessary complexity and costs.	Noted
Canada	TA 2	Trade Association	Section 2	2.2 Levels			Content Feedback	Has it been considered that: Specifically, regarding the Levels and the Matrix, the different levels of auditors is of concern as it is anticipated that stakeholders along the supply chain expect an auditor to be fully trained in auditing to the given program not at entry level, novice, trainee, etc. Will this result in stakeholders opting to move away from GFSI and return to company specific supplier audits using their own internal auditors, many of whom are already in the field auditing for product specific specifications.	Noted
Canada	TA 2	Trade Association	Section 3	Overall Section			Suggestion	Has it been considered that: Specifically, regarding the Levels and the Matrix, the different levels of auditors is of concern as it is anticipated that stakeholders along the supply chain expect an auditor to be fully trained in auditing to the given program not at entry level, novice, trainee, etc. Will this result in stakeholders opting to move away from GFSI and return to company specific supplier audits using their own internal auditors, many of whom are already in the field auditing for product specific specifications	Noted
Canada	TA 2	Trade Association	Section 4	Overall section			Content Feedback	Has it been considered that: The apparent duplication of the efforts of other bodies, complexity and costs associated with the Framework may reduce the uptake of GFSI recognized programs and reduce the number of individuals interested in becoming auditors.	Noted
Canada	TA 2	Trade Association	Overall document				Suggestion	Has it been considered that: It is challenging to comment on the merits of the Framework when details of how it will be applied are not included. How it will be applied will not be determined until the framework has been approved. This is problematic from a commenting perspective. / - The Framework appears introduce increased complexity into the process of qualifying auditors with the required competence to perform GFSI audits. / The apparent duplication of the efforts of other bodies, complexity and costs associated with the Framework may reduce the uptake of GFSI recognized programs and reduce the number of individuals interested in becoming auditors. / The Framework has the potential to add unnecessary complexity and costs for stakeholders along the supply chain. / - In the absence of an understanding of how the proposed framework would be applied within the context of the Benchmarking Requirements, it is very difficult to comment on the content of the framework. / Will there be alignment between the Framework and the GFSI Benchmarking Requirements? / Would the Framework intersect with CPO requirements for internal auditors?	Opportunity Identified
Japan	CPO 2	CPO	Section 1	Figure 1			Suggestion	Please clearly indicate what the vertical axis represents, as this will make it easier to understand the relationship with the levels described below.	Agreed
Japan	CPO 2	CPO		Figure 1			Suggestion	It is recommended to specify which level of auditors can influence the outcome of the audit.	Opportunity Identified
Japan	CPO 2	CPO	Section 2	2.1. Principles			Suggestion	It is recommended that the expertise for each product type be kept as the nature of each auditor and removed from the registration requirements for step-up. It is difficult to demonstrate competence for each product type, and would be ineffective in resolving auditor shortages.	Noted
Japan	CPO 2	CPO		2.1. Principles			Suggestion	To avoid confusion, please clarify the discretion of trainee auditor, novice auditor, and auditors.	Opportunity Identified
Japan	CPO 2	CPO		2.1. Principles			Suggestion	Please remove the method of requesting expertise for each product type in Food Chain categories, as this may limit the judges' activities.	Noted
Japan	CPO 2	CPO	Section 3	Matrix	Novice Auditor	Specialised Knowledge	Suggestion	Please remove the method of requesting expertise for each product type in Food Chain categories, as this may limit the judges' activities.	Noted
Denmark	CPO 3	CPO	Section 1	1.1. Background			Suggestion	.. as it is all about people, also when we talk about auditors .. it is suggested to focus even more on the human competences, which is really the limit in driving food safety and a strong food safety culture ..	Opportunity Identified
Denmark	CPO 3	CPO	Section 1	1.1. Background			Suggestion	.. it is suggested to include creating an environment that is attractive to grow in for the younger generation / the younger talents ..	Opportunity Identified
Denmark	CPO 3	CPO	Section 2	Overall section			Suggestion	.. it is again suggested to focus more on the human skills as auditors can be seen as 'train the trainers' as they are training the company in training their own staff in driving Food Safety .. and continuous development of the company Food Safety Culture .. auditor can be seen as food safety therapist as their job is to expose lacks in the systems or behaviors, and facilitate the company to take own responsibility in both becoming aware of the lacks or limits (awareness), find root causes and taken action to .. which can all be emotionally challengeine ..	Opportunity Identified
Denmark	CPO 3	CPO	Section 2	2.1. Principles			Suggestion	.. it is suggested to focus more on 'learning by doing' .. and the need of master teaching by exchange of experiences .. the best auditors have experience in that all sites are different as the people are different, even though processes and production may be similar .. experience sharing is vital .. sharing of experiences requires use of senses and emotions .. please see here a reference to some work we have done about this .. <a href="https://www.cell.com/heliyon/fulltext/S2405-8440(23)00278-5">https://www.cell.com/heliyon/fulltext/S2405-8440(23)00278-5</a>	Opportunity Identified

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Denmark	CPO 3	CPO	Section 2	2.1. Principles			Suggestion	.. it is suggested to bring more focus to the goal, which is to create auditors that can move and stimulate companies/sites - meaning food safety change agents - in order to move companies and sites in driving food safety and develop the food safety culture ..	Noted
Denmark	CPO 3	CPO	Section 2	2.1. Principles			Suggestion	.. it is suggested to combine educational and training background as these are very much linked .. e.g. the training can be somehow untraditional and still very comprehensive ..	Opportunity Identified
Denmark	CPO 3	CPO	Section 2	2.1. Principles			Suggestion	.. it is suggested to describe Codex as the common international framework ..	Opportunity Identified
Denmark	CPO 3	CPO	Section 2	2.1. Principles			Suggestion	.. it is suggested (in point A, a, iii) to focus on techniques to learn to both viewing a Food safety system holistic and spotting important details ..	Opportunity Identified
Denmark	CPO 3	CPO	Section 2	2.1. Principles			Suggestion	.. it is suggested in point A, b, ii to make a reference to the overall international framework, Codex ..	Opportunity Identified
Denmark	CPO 3	CPO	Section 2	2.1. Principles			Suggestion	.. it is suggested in point B, b, i, to focus on training the auditor ability to ceate an atmosphere of psychological safety .. for the auditee to learn from the audit and improve and develop the food safety ..	Opportunity Identified
Denmark	CPO 3	CPO	Section 2	2.2 Levels			Suggestion	.. it is suggested to focus in point E (audit team leader/leader/trainer on, that an audit leader is one that are capable and chooses to continuously develop ones own culture in order to develop the culture around them .. continuously going into emotional resistance and developing from there e.g. see link/reference to work on mechanisms linking individual and organisational culture development ....	Opportunity Identified
Denmark	CPO 3	CPO	Overall document				Suggestion	<u>Thank you for the work and for sharing ! Overall this is a very interesting and thorough document, however it needs more work, integration and focus on human skills, as the document still seems somehow fragmented. Please find here a link to work we have done in developing human skills: <a href="https://doi.org/10.1016/j.heliyon.2023.e13071">https://doi.org/10.1016/j.heliyon.2023.e13071</a> Also, it is not clear if this approach will attract the needed younger talents - and maybe we should ask younger talents whats it needed for them to join such a career. Our experience is that a central issue for younger talents, is that they can grown a family besides the job (especially when the children are small), and wish to work as and in a team og auditors, meaning that this has to be taken into account.</u>	Opportunity Identified
Japan	CB 15	CB	Section 2	2.1. Principles			Content Feedback	Please note on b.Specialized knowledge As in Category C, there are a wide variety of product types within the sub-categories. As stated, it is understandable that the skills to be managed and the required competencies differ for each product type. However, if these are strictly managed, there is a concern that it will become a factor in reducing the number of people willing to become examiners.	Opportunity Identified
Japan	CB 15	CB	Section 3	Matrix	Auditor	Educational qualifications	Content Feedback	I strongly agree that certification should be based on work experience in the food industry, not just academic qualifications.	Agreed
United States of America	MAN 6	Manufacturer	Section 1	1.1. Background			Suggestion	Additional challenges FSA attractiveness/retention for consideration: o travel/work life balance, realistic workload and travel constraints especially when role involves global travel on various time zones, tiredness o may work in relative isolation without necessarily daily interactions with peers, need strong self-motivation mindset o language and cultural barriers Additional considerations: o Need to communicate on Pros & Opportunities of FSA role to balance Cons/Constraints o The importance of building a community for auditors to enhance calibration and on-going learning and minimize the potential isolation o Is AI evolution a potential threat and/or an opportunity for the evolution of FSA role ?	Opportunity Identified
United States of America	MAN 7	Manufacturer	Section 2	Overall section			Suggestion	Some best practices for auditor technical development include: o Ensuring the right balance between floor time and program review is key. Focusing only/mainly on programs will lead to missing the true operational risks on the factory floor (e.g. sanitation execution, HACCP execution...). The opposite is also true as program robustness needs also to be challenged in parallel with floor time. o Plant operational experience is key in understanding what can typically go wrong in "plant real life" and what possible mitigations are truly adding value and can be realistically implemented in a sustainable way. o "Good Inspection Practices" should also be a focus area in Dimension 1 Core Competence to ensure repeatable and consistent evaluation (inspection tools, method, senses, key focus areas...) o Virtual vs Physical audit require additional set of skills (soft & hard) and this needs also to be assessed/covered in the framework. Even if full virtual audits may not be possible in GFSI scheme there might be hybrid physical/virtual audit types. o Incorporation of the efficient and appropriate use of new technologies (e.g. videoconference, 3D cameras...) o Calibration exercises are critically important Challenges o How to overcome natural bias due to past experiences from FSA on both extremes of spectrum (too strict and/or too loose vs actual audit scheme requirements) – Always reference back to standard, what does exactly standard say/require ? o There is a tremendous depth of technical expertise needed for a wide variety of processes/product types in our food supply. There is tension between being a specialist vs a generalist. Can both be equally efficient and are both needed to serve the market? o Having theoretical knowledge is important, and auditors who have practical "real plant experience" can help provide a deeper audit experience o Global regulatory knowledge is essential for food safety auditors	Opportunity Identified
United States of America	MAN 7	Manufacturer		Overall section			Content Feedback	We appreciate that the framework contains technical and soft skill development. • We would like to see the inclusion of calibration exercises, time management and robust agenda management included in the framework.	Noted
United States of America	MAN 7	Manufacturer	Section 3	Overall Section			Suggestion	The matrix is helpful in understanding expectations by level	Agreed
United States of America	MAN 7	Manufacturer	Section 5	Overall section			Suggestion	o The Framework Implementation Examples clearly outline expectations on how to conduct the auditor's self-assessment. It would be helpful to include examples of potential action items for self identified gaps found in the self-assessment.	Opportunity Identified

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
United States of America	MAN 7	Manufacturer	Overall document				Suggestion	Thank you. In our auditing industry, this work is paramount – developing auditors so that the audits conducted and the reports that are generated are trusted by customers and most importantly adding value to the plants. The framework provides an exciting roadmap for a career in auditing that will hopefully turn the page on the issues currently faced.	Agreed
United States of America	NGO 3	NGO's/IGO's	Section 1	Overall section			Content Feedback	The document does not clearly define whether this is a professional development framework to be utilized by individuals as a self assessment only to identify where they are at currently in their professional development towards becoming a (food safety) auditor or audit team leader, or whether these are also requirements that CPOs who are benchmarked by GFSI also need to adhere to. If it is the latter, then the requirements are not sufficiently clear enough, and they do not align with the latest draft GFSI benchmarking requirements that were out for consultation recently.	Opportunity Identified
United States of America	NGO 3	NGO's/IGO's	Section 2	2.1. Principles			Content Feedback	Section 2.1 (b)(ii) - This section includes auditors being able to recommend improvements. Schemes benchmarked to GFSI requirements cannot recommend improvements (OFIs) as this is a conflict of interest and is considered consultancy.	Opportunity Identified
United States of America	NGO 3	NGO's/IGO's	Section 2	2.2 Levels			Content Feedback	Section 2.2 C: Trainee auditor - seems to imply that a trainee auditor can audit without supervision, which is not in accordance with ISO 17021-1. • Section 3 (A)(a) - Entry level auditor - Codex General Principles of Food Hygiene or Equivalent: Clarification needed on what a **Level 1 Food hygiene or equivalence is. • Body of the Document and Appendix 2 (Glossary): The definition of a technical expert, which is referenced under Appendix 2 of this document aligns with ISO 19011 and this is how CPOs and CBs/ABs currently apply technical experts, however, the content of this document e.g, the Matrix under section 3, requires the technical expert to have an advanced depth of knowledge and understanding of auditing activity, amongst many other qualities that are not required by current technical experts. In the context of food safety Schemes/standard auditing, technical experts are used to provide specific knowledge and expertise on a process or activity or food chain category, and are not required to be competent and proficient auditors, as they do not act as an auditor, but an expert in (part) of the scope.	Opportunity Identified
United States of America	NGO 3	NGO's/IGO's	Section 3	Matrix	Auditor	Educational qualifications	Content Feedback	Clarity is needed on whether GFSIs position on the need for education as well as work experience has changed, as this document refers to an auditor and a audit team leader/trainer, to need either a degree or diploma in Food Sciences or other equivalent field, OR relevant experience in the food industry. This contradicts the current GFSI benchmarking requirements.	Opportunity Identified
United States of America	NGO 3	NGO's/IGO's	Section 3	Matrix	Audit Team Leader/Trainer	Educational qualifications	Content Feedback	Clarity is needed on whether GFSIs position on the need for education as well as work experience has changed, as this document refers to an auditor and a audit team leader/trainer, to need either a degree or diploma in Food Sciences or other equivalent field, OR relevant experience in the food industry. This contradicts the current GFSI benchmarking requirements.	Opportunity Identified
United States of America	FS 1	Food Service	Section 1	Overall section			Content Feedback	Generally speaking I found the ways the "Background" section was written was confusing. I also don't think we've truly identified the root causes of the issues or quantified the problem we are trying to solve. I don't think anything in this framework, for example, would address high attrition or retirement of auditors. In fact, if we impose new requirements on existing auditors we are more likely to drive good auditors away from the industry. I am a firm believer that we need to have competency requirements for auditors and methods for them to acquire and be measured against competencies. Please note that there is already much of that in place today within the frameworks of the CPOs and the CBs. Anything new created by GFSI would have to replace some of the existing requirements effectively enough that we would feel confident moving away from them. Additionally, achieving consistent, high quality audits is not only dependent on auditor competency. It is also dependent on having appropriate durations for a throughout audit, which has economic implications for sites, which is tied to the ever increasing content of the audits. This is a complex issue that deserves a full review and consideration as to how we drive improved audit quality. I am afraid we could implement a framework like is suggested here and still have the same issues in 10 years, because we've not truly diagnosed the problems nor crafted the appropriate solutions.	Noted
United States of America	FS 1	Food Service	Section 2				Content Feedback	Overall, the framework has many good components, I would support. However, there is much that is not clear from the framework. I also feel that the definitions of the different level auditors is arbitrary and over simplified, without real clarity as to what those different levels can really do, how they will get "continuous" learning, and how we will measure their progress along the continuum. It is not clear how an auditor would gain specialized knowledge in section B. Under Legislative & regulatory framework it suggests that the auditor could recommend improvements. This is directly contradictory to the requirements for a 3rd party auditor to not consult. Other notes: "Fair presentation" suggests the auditor should balance good comments with bad. I support positive comments, but depending on the audit outcome, there may not be a good reason to provide that balance and "fair" is a very subjective term. Section 2.2 references "Product Safety Auditing" this doesn't seem to be referenced elsewhere and I don't believe is the most appropriate terminology. Regarding Levels, it is not clear what each of these levels will be allowed to do. Are we OK with a trainee auditor doing internal audits, for example? Under the level of technical expert it is referenced that they would have national or international responsibilities. This is totally arbitrary and geographic responsibility is not relevant to their expertise as an auditor.	Noted
United States of America	FS 1	Food Service	Section 3	Matrix	Auditor	Risk Based Approach	Content Feedback	This section suggests that the auditor is managing risk. This is not the role of the auditor and the audit process is not only determined by the auditor - the CPO, the realities on the ground, and other factors can influence an audit. I fully support risk based approaches but it needs to be clear that it is not the auditors role to manage risks for the site.	Opportunity Identified
United States of America	FS 1	Food Service	Section 3	Matrix	Technical Expert	Communication	Content Feedback	No idea what the top box in this section is trying to say. Evaluates innovative or creative methods....	Opportunity Identified

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
United States of America	FS 1	Food Service	Section 3	Overall Section			Suggestion	<p>Overall, as noted, I am very concerned that implementing a framework like this without fully understanding the root causes of the problems trying to be solved, will result in much work, duplication of efforts, and dissatisfaction with the results - relative to solving the identified issues. The economic &amp; logistic model of auditing must be considered in relation to maintaining or attracting auditors to the field.</p> <p>I implore GFSI to work closely with the certification bodies and CPOs in development of this program. The Certification Bodies are closest to the auditors. They are the ones that hire them and understand what attracts them, deters, them or causes them to leave the field. Additionally, they will have valuable insights into how competencies can be measured. Not having them at the table for the development of this program and details of the process and requirements, will result in this not being accepted or successful. Certification bodies tend to be an under represented stakeholder within GFSI, historically. Given that they are the ones that do the work and the majority of them want to deliver consistent high-integrity audits, they have much value to contribute to this process.</p> <p>This framework, from my perspective raises more questions than answers. How it will be implemented, how it will be funded, how it will relate to existing approved auditors, how it will truly solve the problems that it says it wants to solve are all open questions to be considered.</p>	Noted
United States of America	FS 1	Food Service	Overall document				Suggestion	Should this initiative progress, please be collaborative in its design and be sure include the CPOs and CBs, as this will only be successful if they are on board and contributing to its success.	Noted
Germany	CPO 4	CPO	Section 1	1.3 Intended Audience			Content Feedback	We agree with the approach to attract non-traditional candidates but this is not reflected in the current GFSI BR and is challenged at the time being.	Opportunity Identified
Germany	CPO 4	CPO	Section 2	2.1. Principles			Content Feedback	To increase the number of Food Safety Auditors, these requirements should not be defined too strict and should give the flexibility to CPOs to integrate such requirements in their standards.	Opportunity Identified
Germany	CPO 4	CPO	Section 2	2.2 Levels			Content Feedback	Give flexibility to CPOs to define combination of educational background and food safety professional experience.	Noted
Germany	CPO 4	CPO	Section 2	2.2 Levels			Content Feedback	CPOs have currently different definitions and levels. Should be discussed with CPOs if this document will be integrated in the BR and become mandatory.	Noted
Germany	CPO 4	CPO	Section 2	2.2 Levels			Content Feedback	Entry level: not clear what will be the role of this auditor as they still don't fulfil minimum requirements of work experience	Opportunity Identified
Germany	CPO 4	CPO	Section 2	2.2 Levels			Content Feedback	The definitions of technical experts (cannot be audit team leader), trainee, site managers are not aligned with the current CPOs definitions.	Noted
Germany	CPO 4	CPO	Section 3	Matrix	Entry Level Auditor	Educational qualifications	Content Feedback	Not sure how a person with basic reading and writing skills can pretend to become a Food Safety Auditor.	Noted
Germany	CPO 4	CPO	Section 3		Auditor	Educational qualifications	Content Feedback	Interesting to open the educational diploma criteria but this is currently not reflected in the GFSI BR and it is challenged by the BL.	Opportunity Identified
Germany	CPO 4	CPO	Section 4	Overall section			Content Feedback	In terms of accreditation it needs to be reflected that CBs have a crucial role in this being responsible for competence of their auditors (reference to 17065 and 17021).	Opportunity Identified
Germany	CPO 4	CPO	Section 4	4.1. Self-assessment			Content Feedback	If all already approved auditors who have been auditors for 10+ years need to be assessed against the new requirements of the framework and if the experience that has been accepted in the past will be questioned, it must be taken into consideration whether those auditors will still want to continue and if not this will increase the auditor scarcity we are facing at the moment.	Opportunity Identified
Germany	CPO 4	CPO	Section 4	4.1. Self-assessment			Content Feedback	For sure auditor maintenance and staying up to date and harmonize is key. However the focus shall still be auditing, otherwise the mission of solving the lack of FSA won't be accomplished.	Opportunity Identified
India	FBO 2	FBO	Section 1	Overall section			Content Feedback	Very useful information	Agreed
India	FBO 2	FBO	Section 2	Overall section			Content Feedback	Informative	Agreed
India	FBO 2	FBO	Section 3	Matrix	Auditor	Technical Aspect of Food Safety	Content Feedback	Useful	Agreed
India	FBO 2	FBO	Section 4	Overall section			Content Feedback	Informative	Agreed
India	FBO 2	FBO	Section 5	Overall section			Content Feedback	Good Example	Agreed
India	FBO 2	FBO	Appendix	Appendix 1			Content Feedback	Good	Agreed
India	FBO 2	FBO		Appendix 2			Content Feedback	Good	Agreed
Oman	CB 16	CB	Overall document				Suggestion	Need an Independent body for Auditor Qualification so Auditors would not be more dependent to the CB	Opportunity Identified

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
United Kingdom	EDU 2	Education	Section 1	1.1. Background			Content Feedback	capacity building is critical to future proof the auditor pool .1.1.ii Building ' knowledge and experience' through training and ongoing development. (ii) establishing and demonstrating (iv) capacity building - building a community of food safety auditors , operating across a spectrum of knowledge, experience , skills and capabilities. - Training curriculum - consider, development programme for individuals to develop and evolve in the role of a professional food safety auditor.	Noted
United Kingdom	EDU 2	Education	Section 1	1.2 Importance			Content Feedback	elevate experience of auditors as individuals is essential to development	Agreed
United Kingdom	EDU 2	Education	Section 1	1.3 Intended Audience			Content Feedback	this section is repetitive and could be condensed .	Noted
United Kingdom	EDU 2	Education	Section 2	2.1. Principles			Suggestion	2 capabilities to be developed 1= technical 2= auditing , technical aspects of food - does not make sense ? Competency used through the document and can be misinterpreted in different contexts	Noted
United Kingdom	EDU 2	Education	Section 2	Figure 2			Content Feedback	Dimension 1 - experience is critical to the development of the auditor	Noted
United Kingdom	EDU 2	Education	Section 2	Figure 3			Suggestion	wrap the figure with a continuous loop of CPD	Noted
United Kingdom	EDU 2	Education	Section 3	Overall Section			Suggestion	The matrix principle is positive - in order to build flexibility into the levels in the matrix - equivalence in capabilities - technical / auditing is required and therefore, the matrix requirements need to be set as a minimum ?  Matrix layout requires review and formatting for consistency in use . <b>The matrix may benefit from . simplification – for ease of use.</b>	Opportunity Identified
United Kingdom	EDU 2	Education	Section 4	Overall section			Content Feedback	Ultimately, this structured and reflective self-assessment process promotes continuous learning and development, equipping individuals with the competencies needed to excel in their professional journey.CPD , use application and verification of CPD is inconsistent currently. This may have an impact on auditor technical / auditing competency . Therefore the process of CPD evaluation and sign off is critical	Opportunity Identified
United Kingdom	EDU 2	Education	Section 5	Overall section			Suggestion	<b>examples will develop over time - but those shared illustrate the use of frame work</b>	Agreed
United Kingdom	EDU 2	Education	Overall document				Suggestion	The document is well written and considered. 27 Pages is excessive for a working document and could be reviewed / revised for ease of use. As some sections are repetitive. how this will be actioned / used by the sector will be a challenge. No reference to capacity building in the document. The CPD element of the framework needs to be included in the structure Figure 3 .	Opportunity Identified
United Kingdom	TA 3	Trade Association	Section 1	Overall section			Suggestion	One notable absence in the considerations is harmonization. Across the GFSI endorsed schemes, individual schemes have individual competence requirements. Whilst individual schemes may have a need for specific competence requirements there are many commonalities. This Framework would be the perfect place to incorporate as many commonalities as possible. This would speed up 'qualification', make auditor resources more efficient by being able to move more easily across different schemes and ultimately reduce costs for all.	Noted
United Kingdom	TA 3	Trade Association	Section 1	1.1. Background			Suggestion	Any attempt to increase the input of auditors into food safety auditing is to be welcomed. It is vital that any new initiative such as these has very clear metrics in place in order to assess the effectiveness of such measures	Opportunity Identified
United Kingdom	TA 3	Trade Association	Section 1	1.3 Intended Audience			Suggestion	The objective of drawing individuals from a variety of backgrounds is important. Already a cross fertilisation of ideas is seen with personnel moving with conformity assessment (accreditation bodies, scheme owners and assurance bodies) and also from industry, retailers and other parts of the food sector. This should continue to be encouraged as well as a widening of the search horizon	Agreed
United Kingdom	TA 3	Trade Association	Section 2	2.2 Levels			Suggestion	Overall, the boundaries between the different levels of auditor seem very fine; is this deliberate to have easy transfer from one level to another or does there need to be greater differentiation?	Noted
United Kingdom	TA 3	Trade Association	Section 3	Overall Section			Suggestion	It is noted that there are no time frames attached to any of the measures used in the matrix. This is fully supported as longevity in a role does not automatically provide proof of competence.  The use of alternative routes is supported, notably not having strict educational qualification levels for differing levels of auditor.  There is still a tendency for experience to be a key determinant of competence when this should be lessened if other criteria are being met in <b>judging competence</b>	Opportunity Identified
United Kingdom	TA 3	Trade Association	Appendix	Appendix 1			Suggestion	§ Add ISO/IEC 17000 Conformity assessment — Vocabulary and general principles (link to point below)	Noted
United Kingdom	TA 3	Trade Association	Appendix	Appendix 2			Suggestion	§ ISO/IEC 17000 would be a better reference point as it covers both ISO/IEC 17021-1 and ISO/IEC 17065 schemes whereas ISO 19011 only relates to management system standards (ISO/IEC 17021-1)	Noted
United Kingdom	TA 3	Trade Association	Appendix	Appendix 2			Suggestion	§ Certification Body – whilst recognising GFSI-endorsed schemes use accreditation, as regards terminology, not all certification bodies are accredited. Maybe an expansion of the definition to ensure the endorsement of accreditation fits into the definition	Noted
United Kingdom	TA 3	Trade Association	Appendix	Appendix 2			Suggestion	§ If accreditation is to be mentioned, should a definition of Accreditation Body be added?	Noted
United Kingdom	TA 3	Trade Association	Overall document				Suggestion	As ever, any assistance (Organisation) and its members can play in this activity, GFSI is welcome to contact for assistance.	Noted
United Kingdom	CPO 5	CPO	Section 1	1.1. Background			Content Feedback	"The term 'Independent Auditors' is not in alignment with the ISO19011 definition. All auditors, whether conducting 1st, 2nd or 3rd party audits should be independent."	Noted
United Kingdom	CPO 5	CPO	Section 1	1.1. Background			Content Feedback	The document states "agreed-upon principles" - however it is not clear who this is referring to.	Noted



Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
United Kingdom	CPO 5	CPO	Section 1	1.3 Intended Audience			Content Feedback	By what system can a 'Site Manager' assess the competency of an external third party auditor? Site Managers do not have access to competency documentation relating to the external auditors.	Noted
United Kingdom	CPO 5	CPO	Section 1	1.3 Intended Audience			Content Feedback	The other industries mentioned (military, finance etc) generally have different approaches and priorities when compared to FSAs. These "key generic skills" may not be as transferable as suggested.	Noted
United Kingdom	CPO 5	CPO	Section 1	Figure 1			Suggestion	Whilst we agree that individuals with a foundational interest in food safety auditing / fresh graduates should be a key focal point for building the future FSAs it is essential that they have knowledge of the manufacturing environment. We would strongly encourage that there be an equally focused route open for industry experienced individuals.	Agreed
United Kingdom	CPO 5	CPO	Section 1	Overall section			Suggestion	This document, if intended to attract new talent, would greatly benefit from explaining career progression opportunities, potential career experiences and expected remuneration ranges (for example).	Noted
United Kingdom	CPO 5	CPO	Section 1	Overall section			Content Feedback	The document is not clear in whether the intention is for the 'Levels' to become an industry standard and whether these levels will influence salary scales.	Noted
United Kingdom	CPO 5	CPO	Section 1	Overall section			Content Feedback	A self-assessment can be very subjective - some people will consider themselves highly competent when they are not.	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 1	Overall section			Content Feedback	There is no mention of the role/competency of witness auditors.	Noted
United Kingdom	CPO 5	CPO	Section 1	Overall section			Suggestion	The document only refers to Food Safety. Consideration should be given for the other Food Safety adjacent and supply chain related standards. For example Storage & Distribution or Packaging.	Agreed
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Content Feedback	Does GFSI intend to establish a programme to support a structure of building technical knowledge of Food (and other schemes)?	Noted
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Content Feedback	With respect to "non food safety educated people" looking to start the process of FSA qualification what is the base knowledge that is required?	Noted
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Suggestion	A minimum knowledge threshold should be defined for all elements.	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Suggestion	In 2.1 A a iii. The element states "training might include" but all training stated should be mandatory	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Content Feedback	In 2.1 A a iv. The element states various tools and strategies which is an essential requirement. However is there a specified minimum level that auditors should have?	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Content Feedback	"There is a statement ""Legislative and regulatory Framework: this element ensures that auditors can accurately assess compliance, manage risks, and recommend improvements based on legal standards in a single jurisdiction"" However, it should never be the role of an auditor to recommend improvements. This would be a consultancy function."	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Content Feedback	"There is a statement ""Legislative and regulatory Framework: this element ensures that auditors can accurately assess compliance, manage risks, and recommend improvements based on legal standards in a single jurisdiction"" What is a ""single jurisdiction"" in this definition?"	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Content Feedback	ISO19011:2018 also expects that integrity & confidentiality to be covered under 'Auditing Capabilities'. This seems like an omission.	Noted
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Suggestion	There is an opportunity to harmonise with the FCC Sub Categories. Currently they are too wide and, to ensure credibility of auditors and their knowledge, this needs to be divided further.	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Suggestion	"2.1 A b Specialised knowledge II Legislative and regulatory Framework uses a single jurisdiction as a baseline. However this is not realistic as most food sites will supply a number of markets and will have contracts with organisations beyond a single jurisdiction. Although this requirement is key and we are pleased to see its inclusion, it needs to be in line with the requirements of the market place."	Noted
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Content Feedback	2.1 A b Specialised knowledge iii Stakeholder Requirements. Please consider that frequently stakeholder information is confidential and not available to auditors. Requirements to show knowledge is specialised based on the jurisdiction and needs to be demonstrable.	Noted
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Suggestion	2.1 B b Risk based approach iii states "this element directs audits toward areas of highest risk" Does this advocate for auditors prioritising a high risk audit trail over following the CPO requirements. Flexibility in this area is encouraged	Noted
United Kingdom	CPO 5	CPO	Section 2	2.1. Principles			Content Feedback	2.1 B b iv Communication "explain complex issues". Consideration should be given to ensure that auditors do not begin to provide consultancy or advice.	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 2	2.2 Levels			Content Feedback	"Technical Expert definition does not fit with ISO19011. A technical expert shall not participate in the development of the audit. According to the 'Auditor Levels' this would be expected of a Technical Expert."	Noted
United Kingdom	CPO 5	CPO	Section 2	2.2 Levels			Content Feedback	The explanation of "novice auditor" does not indicate any knowledge above "entry level auditor".	Noted
United Kingdom	CPO 5	CPO	Section 2	2.2 Levels			Suggestion	The term "auditor in training" would be more suitable.	Noted
United Kingdom	CPO 5	CPO	Section 2	2.2 Levels			Suggestion	"The term ""auditor"" is generally someone who works under supervision and does part of an audit but does not function as a lead auditor, even when working alone. Harmonise terminology with industry standards."	Noted
United Kingdom	CPO 5	CPO	Section 2	2.2 Levels			Suggestion	"The term ""Technical Expert"" is generally a non-auditor who provides technical expertise to the lead auditor. Harmonise terminology with industry standards."	Noted
United Kingdom	CPO 5	CPO	Section 2	2.2 Levels			Suggestion	"Lead auditors" and "Trainers" should be distinct and separate roles.	Noted
United Kingdom	CPO 5	CPO	Section 2	Figure 3			Content Feedback	Does this figure indicate that an entry level auditor will be observing audits only? If that is the case the work would be non-paid and so would be at the cost of the auditor or CB.	Noted
United Kingdom	CPO 5	CPO	Section 2	Figure 3			Content Feedback	A technical expert typically has expert knowledge of the category/industry and provides guidance to the lead auditor but is not expected to audit in the normal sense of the word. The expectation outlined in figure 3 is confusing.	Noted

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
United Kingdom	CPO 5	CPO	Section 2	Figure 3			Content Feedback	Are the entry-level and novice level auditors able to contribute to the audit during this early training cycle?	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 2	Figure 3			Suggestion	We would advise a review of the auditor level terminology. Would a novice auditor progress to trainee auditor?	Noted
United Kingdom	CPO 5	CPO	Section 2	Figure 3			Suggestion	More detail is required to understand how 'entry level' auditors are expected to gain experience and expertise. The training of entry level auditors is a cost that must be paid by either the person, the organisation or the CB	Noted
United Kingdom	CPO 5	CPO	Section 3	Matrix	Audit Team Leader/Trainer	N/A	Content Feedback	Where there are more than one criteria within an element are these classed as "AND" or "OR" in terms of their requirement for that particular level?	Noted
United Kingdom	CPO 5	CPO	Section 3	Matrix	Audit Team Leader/Trainer	Fair Presentation	Content Feedback	The term "influences industry" is too vague. There are many other examples of vague terminology that cannot be measured. The whole matrix requires a full review of terms and requirements.	Noted
United Kingdom	CPO 5	CPO	Section 3	Matrix	Entry Level Auditor	Due Professional Care	Content Feedback	The use of a checklist to maintain focus and/or ensure all elements are covered is not an indicator of an 'entry level auditor'.	Noted
United Kingdom	CPO 5	CPO	Section 3	Matrix	Entry Level Auditor	Educational qualifications	Suggestion	In 'Technical Qualification' it states "High school". However this term is not ubiquitous in all regions. This must be clarified.	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 3	Matrix	Expert Auditor	N/A	Content Feedback	The expectation that an "Expert Auditor" would provide professional representation at events or conferences is unrealistic. Not all expert auditors would be involved in this activity.	Noted
United Kingdom	CPO 5	CPO	Section 3	Matrix	N/A	N/A	Content Feedback	There is no detail to specify an expected length of time to move to the next level.	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 3	Matrix	N/A	Educational qualifications	Suggestion	A framework for comparison between countries is required when using terminology referring to education.	Noted
United Kingdom	CPO 5	CPO	Section 3	Matrix	N/A	Auditing training	Content Feedback	The element 'Audit Training' is too vague. It does not specify what this training may be and in what form. There is no detail of duration or evidence required.	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 3	Matrix	N/A	N/A	Content Feedback	The 'Food Chain Categories' element does not specify a duration to demonstrate knowledge and understanding. This is essential.	Opportunity Identified
United Kingdom	CPO 5	CPO	Section 3	Matrix	N/A	Legislative and regulatory framework	Content Feedback	The 'Legislative and regulatory framework' element does not provide enough detail.	Noted
United Kingdom	CPO 5	CPO	Section 3	Matrix	Technical Expert	Codex General Principles of Food Hygiene Or Equivalent	Content Feedback	The term "considered an expert by their peers" is unclear and not measurable.	Noted
United Kingdom	CPO 5	CPO	Section 3	Matrix	Trainee Auditor	Codex General Principles of Food Hygiene Or Equivalent	Content Feedback	Terms such as "demonstrates knowledge and understanding" is not a measurable or specific criteria so is not fit for purpose.	Noted
United Kingdom	CPO 5	CPO	Section 5	Example 1			Content Feedback	This section, as a whole, is poorly written. There are a number of situations stated that show a lack of understanding of an auditors skill set. For example, how could a junior internal auditor have expert level audit delivery skills?	Opportunity Identified
United Kingdom	CPO 5	CPO	Overall document				Suggestion	Dear GFSI Team I hope this email finds you well. On behalf of (Organisation), I would like to express our appreciation for the opportunity to provide feedback on the consultation regarding the Professional Development Framework for Food Safety Auditors. (Organisation) recognizes the industry-wide challenge concerning the availability of technical auditor resources, and we welcome potential solutions to address this issue. We fully support the creation and implementation of practical solutions to enhance the auditor pool and are willing to assist where possible. We will feedback on specific issues using the jotform. However, after careful consideration,(Organisation) is unable to endorse the proposed framework for the following reasons: 1. Concerns About Achieving Stated Aims We believe the framework may fail to achieve its stated goals and could inadvertently deter auditors from joining the industry due to increased complexity and costs. If the framework is applied retrospectively to existing auditors, as indicated, it could impose unnecessary burdens and confusion within the sector. 2. Complexity of Multiple Auditor Levels The proposed multiple levels of auditors introduce unnecessary complexity, and the distinctions between first, second, and third-party auditors are unclear. Furthermore, the framework appears overly rigid in certain areas, while omitting essential specifics such as timeframes and measurable outcomes. 3. Inconsistencies in Terminology and Definitions The framework contains inconsistencies in terminology and definitions, which are not applied uniformly. Some requirements are neither realistic nor achievable in practice. We will feedback on these using the jotform. 4. Misunderstanding of Auditor Transfer Scope The framework seems to misunderstand the potential for auditors to transfer from unrelated sectors into the food industry. Many technical sectors face similar challenges with auditor scarcity, and the framework does not adequately clarify why auditors from unrelated sectors would be incentivized to transition into the food industry. 5. Absence of Essential Elements Key elements such as integrity and confidentiality, which are critical to auditing practices, are not adequately addressed within the framework. 6. Lack of Transparency in Framework Development The process for the creation of the framework has not been transparent. It is unclear which organizations were permitted to provide input. As a CPO, (Organisation) was not invited to contribute beyond the initial working group, which was subsequently disbanded. We would welcome the opportunity to engage throughout the entire process, especially at the beginning, to offer meaningful input. (Organisation) remains committed to supporting initiatives aimed at strengthening the food safety auditing profession and would be happy to work collaboratively to refine this framework. Thank you for your time and consideration of our feedback. We look forward to continued engagement on this important matter.	Noted

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Nederland	CPO 6	CPO	Section 1	1.3 Intended Audience			Content Feedback	• The document does not clearly define whether this is a professional development framework to be utilized by individuals as a self assessment only to identify where they are at currently in their professional development towards becoming a (food safety) auditor or audit team leader, or whether these are also requirements that CPOs who are benchmarked by GFSI also need to adhere to. If it is the latter, then the requirements are not sufficiently clear enough, and they do not align with the latest draft GFSI benchmarking requirements that were out for consultation recently.	Noted
Nederland	CPO 6	CPO	Section 2	2.1. Principles			Content Feedback	• Section 2.1 (b)(ii) - This section includes auditors being able to recommend improvements. Schemes benchmarked to GFSI requirements cannot recommend improvements (OFIs) as this is a conflict of interest and is considered consultancy.	Opportunity Identified
Nederland	CPO 6	CPO	Section 2	2.1. Principles			Content Feedback	Section 2.1 (b) (ii) - Suggesting to deal with auditor approvals/levels for legislative and regulatory frameworks to be dealt with the same as food chain categories, is not realistic in terms of progressing through various levels based on a single jurisdiction. Auditors need to be able to be aware of the relevant legislation in the countries where they audit, and be able to apply it through learning - it does not have to be assigned to levels.	Noted
Nederland	CPO 6	CPO	Section 2	2.2 Levels			Content Feedback	Trainee auditor - the document suggests that a trainee auditor can audit independently and with minimal supervision - this is contradictory to current ISO and IAF requirements, where trainee auditors are not allowed to audit unsupervised. It is important that the framework does not contradict current practice and requirements.	Opportunity Identified
Nederland	CPO 6	CPO	Section 2	2.2 Levels			Content Feedback	Technical expert - whilst in the glossary the definition of a technical expert is that from ISO 19011, the document contradicts this by referring to the technical expert as an auditor. A technical expert does not act as an auditor, they support the audit team with specific knowledge or expertise only.	Opportunity Identified
Nederland	CPO 6	CPO	Section 3	Matrix	Entry Level Auditor	Codex General Principles of Food Hygiene Or Equivalent	Content Feedback	Clarification needed on what a **Level 1 Food hygiene or equivalence is.	Opportunity Identified
Nederland	CPO 6	CPO	Section 3	Matrix	Technical Expert	Auditing training	Content Feedback	): The definition of a technical expert, which is referenced under Appendix 2 of this document aligns with ISO 19011 and this is how CPOs and CBs/ABs currently apply technical experts, however, the content of this document e.g, the Matrix under section 3, requires the technical expert to have an advanced depth of knowledge and understanding of auditing activity, amongst many other qualities that are not required by current technical experts. In the context of food safety Schemes/standard auditing, technical experts are used to provide specific knowledge and expertise on a process or activity or food chain category, and are not required to be competent and proficient auditors, as they do not act as an auditor, but an expert in (part) of the scope.	Opportunity Identified
Nederland	CPO 6	CPO	Section 3	Matrix	Auditor	Knowledge of Food Safety Principles	Content Feedback	Clarity is needed on whether GFSIs position on the need for education as well as work experience has changed, as this document refers to an auditor and a audit team leader/trainer, to need either a degree or diploma in Food Sciences or other equivalent field, OR relevant experience in the food industry. This contradicts the current GFSI benchmarking requirements.	Opportunity Identified
Nederland	CPO 6	CPO	Section 3	Matrix	Expert Auditor	Educational qualifications	Content Feedback	Clarity is needed on whether GFSIs position on the need for education as well as work experience has changed, as this document refers to an auditor and a audit team leader/trainer, to need either a degree or diploma in Food Sciences or other equivalent field, OR relevant experience in the food industry. This contradicts the current GFSI benchmarking requirements.	Opportunity Identified
Nederland	CPO 6	CPO	Section 3	Matrix	Trainee Auditor	Educational qualifications	Content Feedback	The current GFSI requirements for an auditor is to have both education and work experience. In the context of this framework, it would therefore mean that a trainee auditor who does not hold a degree/diploma would first need to complete a degree/diploma before being able to progress to auditor or expert auditor level, unless the GFSI benchmarking requirements will change and the education requirement is no longer mandatory. The framework needs to be aligned with the auditor qualification requirements in the GFSI benchmarking requirements	Opportunity Identified
Nederland	CPO 6	CPO	Section 3	Matrix	Audit Team Leader/Trainer	Knowledge of Food Safety Principles	Content Feedback	It is unclear which of the requirements throughout the matrix is applicable to the audit team leader and which applies to trainer. An audit team leader needs to be able to lead the audit team, but is not necessarily a trainer. A clear distinction between the two roles are required to align with current industry practice.	Noted
Nederland	CPO 6	CPO	Section 3	Matrix	Expert Auditor	Specialised Knowledge	Content Feedback	Reference is made to advanced depth of knowledge - it is unclear what would be considered as advanced in this context. The term advanced is used throughout the matrix for a n expert auditor - so the comment applies to all places where advanced is used in the matrix and in the document.	Noted
Nederland	CPO 6	CPO	Section 3	Overall Section			Suggestion	The document does not clearly define whether this is a professional development framework that can be used by individuals as a self assessment only to identify where they are at currently in their professional development towards becoming a (food safety) auditor or audit team leader, and is therefore designed as good practice, guidance and is voluntary. In this context it is valuable to assist individuals by providing insight and a roadmap. If this framework is to become mandatory, then it needs to align with the GFSI benchmarking requirements that were out for consultation recently. It is doubtful then how this would contribute to alleviating auditor scarcity, as it will make the process more complex by adding additional requirements, that will make it more difficult for auditors to meet the requirements, and in turn result in less auditors being available.	Noted
Nederland	CPO 6	CPO	Appendix	Appendix 1			Content Feedback	As this is a framework providing individuals a pathway to develop their auditing levels, it is unclear why the GFSI Benchmarking requirements and GFSI governance model and rules of procedure are referenced	Noted
Nederland	CPO 6	CPO	Overall document				Suggestion	In order to comment on this framework, the scope, intent and application of this document needs to be clear. There is a big difference between providing guidance and good practice versus mandatory implementation. The consultancy needs to be transparent - it is not possible to provide informed feedback and input on the framework without being clear on the intent and implementation. We would urge GFSI to involve CPOs, CBs and ABs when defining the implementation, especially where the plan is to include this framework in the benchmarking requirements.	Noted

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
Australia	LG 2	LG	Overall document				Suggestion	See previous feedback provided by AusNZ LG. Other comments are as follows: View that this draft framework is very complimentary to pilot project underway by Australian Institute of Food Science Technology; Definitely noted that this document is focused on the 'what', not the 'how'. That said, members noted that CPOs often have different interpretations of how standards or qualifications are applied - there is a need for greater consistency across schemes; members also noted that in the context of this framework, there are other certification arrangements FSAs need to be mindful of that 'touch the edges' of GFSI certification arrangements; In summary and as per feedback provided previously by the AusNZ LG, members are very positive about the development of this framework but believe that the document would benefit from having repetition and verbose elements addressed. Thank you	Opportunity Identified
New Zealand	NCPO 1	NCPO	Section 1	1.1. Background			Content Feedback	This framework is designed to 'support pressing global challenges' in relation to auditor shortage. It is not clear how the development pathway actually does this? This section then goes on to say 'this approach ensures auditors..... adhere to consistent standards.....' The concept needs to be clear, is the intent consistency of auditing or to solve the issue around lack of auditors? It seems a bit like minimum auditor requirements in disguise or at least has the intent of being misconstrued as that.	Noted
New Zealand	NCPO 1	NCPO	Section 1	1.1. Background			Content Feedback	This describes what a successful intervention looks like but it does not describe the issues trying to be addressed e.g. poor salaries, difficult job, education levels required, lack of training specific to this area, perceived as 'compliance' so not as attractive as other roles, potential to require a lot of travel etc. Generally, the concept of a framework is OK but it will not resolve most of the issues that have led to global auditor shortage.	Noted
New Zealand	NCPO 1	NCPO	Section 1	1.3 Intended Audience			Content Feedback	Seems a stretch to see regulatory agencies utilising the framework.	Noted
New Zealand	NCPO 1	NCPO	Section 1	1.3 Intended Audience			Suggestion	This concept of education providers and trainers using it as a framework is good.	Agreed
New Zealand	NCPO 1	NCPO	Section 2	Figure 3			Suggestion	The concept of figure 3 is OK - but has a very linear nature although that does not seem to be the intent.	Noted
New Zealand	NCPO 1	NCPO	Section 2	2.1. Principles			Content Feedback	Section 2.1B - Auditing capabilities - How does this framework provide greater consistency? Not sure this framework would be any more effective than Continued professional development, minimum numbers of audits annually and peer reviews?	Noted
New Zealand	NCPO 1	NCPO	Section 3	Matrix	N/A	Educational qualifications	Suggestion	This comment applies across all educational qualificationsPossibly too much emphasis on food industry - consider relevant transferable skills e.g. someone with strong micro background may only need a small amount of experience in food industry.	Noted
New Zealand	NCPO 1	NCPO	Section 3		N/A	Educational qualifications	Content Feedback	This does not support the funnel approach. Entry level can be gained without secondary education but cannot move from entry to novice without education . That is a barrier right at the beginning. Can then enter trainee with experience and without education? Very inconsistent. Experience needs to be an alternative to education right throughout.	Opportunity Identified
New Zealand	NCPO 1	NCPO	Section 3		N/A	Risk Based Approach	Suggestion	Good concept to include	Agreed
New Zealand	NCPO 1	NCPO	Section 3		N/A	Legislative and regulatory framework	Content Feedback	Is the intent one or more?	Opportunity Identified
New Zealand	NCPO 1	NCPO	Section 4	Overall section			Content Feedback	This is lots of words without having an intent. 4.2 is a recommendation - what is the intent of how this is implemented. I can see that CPD links to the framework but they are separate things.	Opportunity Identified
New Zealand	CPO 7	CPO	Overall document				Suggestion	Difficult to comment on this framework without seeing the intention of how it is to be implemented which is specifically excluded from this consultation. This framework has already been referenced into the draft GFSI requirements so there would need to be additional consultation on the intention for implementation if written into GFSI benchmarking requirements. There are some broad level areas of concern in that the currently proposed 'levels' of auditors e.g. novice, trainee etc may become default minimum requirements although this would be very difficult to interpret/apply as the intent is that individuals could sit at varying levels in the framework and it is not linear. Generally, the concept of a framework is OK but it does not solve the problems causing the lack of auditors e.g. poor salaries, difficult job, education levels required, lack of training specific to this area, perceived as 'compliance' so not as attractive as other roles, potentially a lot of travel etc. Generally, it feels a bit confused as to whether the framework is trying to resolve global auditor shortage or issues around consistency and integrity of audits. Ultimately, the framework should sit outside the GFSI requirements as a resource and supporting document and CPD (maintaining currency, minimum numbers of audits and peer reviews/assessments etc) should manage consistency and integrity of audits.	Noted
New Zealand	TA 4	Trade Association	Section 1	1.2 Importance			Content Feedback	The framework may cultivate existing skilled food safety auditors but does not detail how to increase skilled auditors. By having more prescriptive competencies and proficiencies does not increase the numbers.	Opportunity Identified
New Zealand	TA 4	Trade Association	Section 1	1.3 Intended Audience			Suggestion	Engineers are a great asset to food safety and not recognised as 'other industries'	Noted
New Zealand	TA 4	Trade Association	Section 1	1.3 Intended Audience			Content Feedback	While the funnel approach could attract a broad audience, there is no timeframe for the framework to provide proficient auditors.	Opportunity Identified
New Zealand	TA 4	Trade Association	Section 1	1.3 Intended Audience			Content Feedback	Regulatory agencies, programme owners, CBs already have benchmarks for auditor competencies across a wide number of standards. It is doubtful that this framework will supersede these. It would add another level to it should there be differences making it arduous.	Noted
New Zealand	TA 4	Trade Association	Section 1	1.1. Background			Content Feedback	The concept of a successful intervention is okay. However, it doesn't find the solution to the shortage of competent auditors.	Noted
New Zealand	TA 4	Trade Association	Section 1	1.3 Intended Audience			Content Feedback	Training providers need to have options of recognition of prior learning to reduce repetition.	Opportunity Identified

Location (Country)	Name	Type of organisation	Section	Detail	Level	Principle	Type of Feedback	Comments	Comment Reviews
New Zealand	TA 4	Trade Association	Section 2	2.1. Principles			Content Feedback	There is no framework / focus on operational audit delivery, the importance of what is happening in real time.	Noted
New Zealand	TA 4	Trade Association	Section 3	Matrix	Entry Level Auditor	Legislative and regulatory framework	Suggestion	Must have basis awareness of food law.	Noted
New Zealand	TA 4	Trade Association	Section 3		N/A	Risk Based Approach	Content Feedback	good to be introducing RBA at all levels.	Noted
New Zealand	TA 4	Trade Association	Section 3	Overall Section			Suggestion	Experience needs to be an alternative to education throughout the matrix, funnel approach and audit delivery cycle. Engineering should be captured as a equipment design is paramount to food safety standards. Codex Food Hygiene is a principle. Further to this is microbiology and should be a defined principle for experienced auditors	Noted
New Zealand	TA 4	Trade Association	Section 4	4.1. Self-assessment			Content Feedback	NZ government agency has implemented CPD with the new Food Act 2014. To save on duplication it is suggested that the MPI CPD can cross-reference to meet the GFSI CPD.	Noted
New Zealand	TA 4	Trade Association	Overall document				Suggestion	MPI CPD is annual and covers	Noted
United Kingdom	EDU 3	Education	Section 1	Overall section			Content Feedback	Reads well. Agree	Agreed
United Kingdom	EDU 3	Education	Section 2	2.2 Levels			Content Feedback	Novice auditor - does this read well? - Would be normally be undertaking e	Noted
United Kingdom	EDU 3	Education	Section 3	Overall Section			Suggestion	This is a big table. Difficult to read without headers. I think this needs to be broken down more as otherwise it is just a huge table	Noted
United Kingdom	EDU 3	Education	Overall document				Suggestion	Overall, the document is well written and considered. I think the document would benefit from being shorter, maybe putting some of the material in the appendices (for example, the working examples). At 27 pages long, wonder how useable this document will be in industry. Will be interesting to see in reality how this framework will be managed. Are the CB's expected now to maintain evidence of compliance to this framework? Will a CB be independent enough to take on this role when there is likely to be a conflict of interest? Managing this will come at cost. If the responsibility fell with CB's this would add considerable workload / technical resource which will likely mean an impact on audit fees	Opportunity Identified
Japan	CB 11	CB	Overall document				Suggestion	In order to continue the GFSI certification scheme, it is essential to resolve the shortage of auditors, and in accordance with this framework, the auditor requirements should be revised immediately based on competence, rather than qualifications or academic background. In Japan, many people acquire expertise through job training at their company, and people with liberal arts degrees sometimes take charge of quality control and quality assurance.	Agreed
China	CB 10	CB	Section 2	2.1 Principles			Suggestion	Asking auditor to expertise all the product type in one Scope is way too difficult for a new auditor to access. Suggest defining the expert level by product type instead of Scope.	Opportunity Identified
China	CB 10	CB	Overall document				Suggestion	CBs may need to invest more time and costs in training personnel who do not have relevant degrees or experience in the food industry.	Opportunity Identified
China	CB 10	CB	Overall document				Suggestion	There is a risk that auditors may resign before completing their training, resulting in a loss of investment without return.	Noted
China	CB 10	CB	Overall document				Suggestion	GFSI BR requires auditors to have "experience in the food or associated industry, including at least two years full time work in quality assurance or food safety functions", and now the framework for auditor development wants to open for non-food industrial related personnel to join the pool, this will not be able to comply with the BR, and those auditors will never have a chance comply for it.	Opportunity Identified