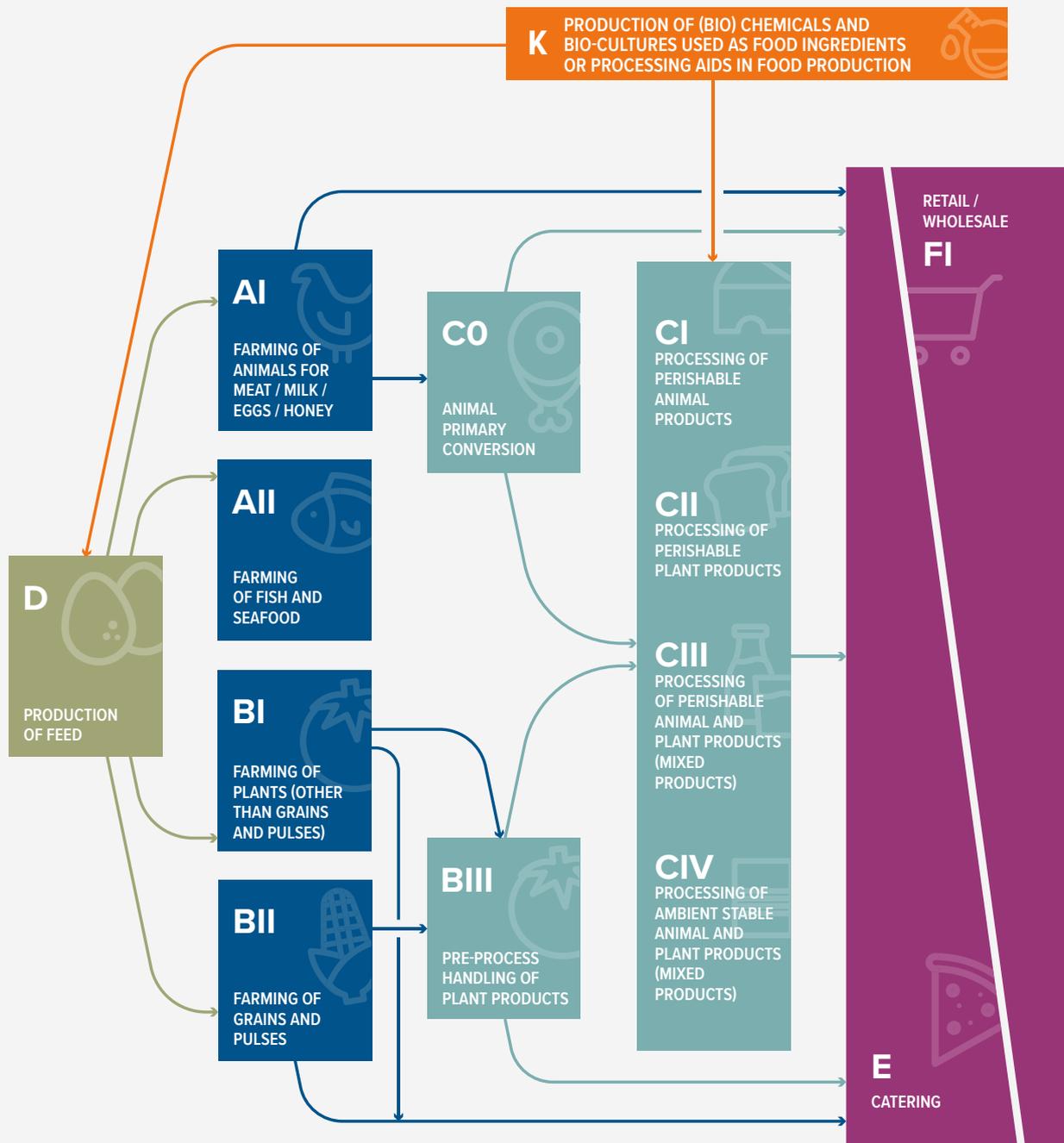




GFSI BENCHMARKING REQUIREMENTS VERSION 2024

PART III
**REQUIREMENTS
FOR THE CONTENT
OF PROGRAMME**

FII Food Broker / Agent



- FII** FOOD BROKER / AGENT
- G** PROVISION OF STORAGE AND DISTRIBUTION SERVICES
- H** PROVISION OF FOOD SAFETY SERVICES
- I** PRODUCTION OF FOOD PACKAGING
- Ji** HYGIENIC DESIGN OF FOOD BUILDINGS AND PROCESSING EQUIPMENT (FOR BUILDING CONSTRUCTORS AND EQUIPMENT MANUFACTURERS)
- Jii** HYGIENIC DESIGN OF FOOD BUILDINGS AND PROCESSING EQUIPMENT (FOR BUILDING AND EQUIPMENT USERS)

Part III - *FII* Food Broker / Agent

Part III of the GFSI Benchmarking Requirements defines the key elements required in a Certification Programme in relation to:

- **Hazard and Risk Management Systems** (Hazard Analysis and Critical Control Points (HACCP) or HACCP-based systems);
- **Food Safety Management Systems;**
- **Good Industry Practices, Good Manufacturing Practices, Good Agricultural Practices.**

This document applies to Certification Programmes applying for the scope of recognition FII - Food Broker / Agent. This scope includes the following product, services and activities:

- **Buying and selling of food, feed and/ or packaging products excluding the production, storage and any physical handling of the product.**

The requirements – named key elements – were identified by a multi-stakeholder group including industry experts to ensure relevance to this scope while ensuring harmonisation of food safety programmes across industry. Although the structure of each scope of Part III of the Benchmarking Requirements is aligned, some of the key elements may be specific to the industry included in this scope.

GFSI-recognised Certification Programme Owners are required to address each key element outlined in this document. The detailed content of each individual Certification Programme must however be

independently developed and is not expected to be a direct copy of the GFSI Benchmarking Requirements.

GFSI has defined in a Glossary terms used in key elements. Part IV, the Glossary, is an integrated part of the GFSI Benchmarking Requirements and definitions shall be applied accordingly in Certification Programmes. In the GFSI Benchmarking Requirements, food is used as an umbrella term and refers to the object of each of the scope, i.e. food, feed, packaging as applicable.

Certification Programmes requiring Certification Bodies to operate according to ISO / IEC 17021 shall ensure they meet the ISO 22000 requirements as well as the Benchmarking Requirements for applicable sectors outlined in Part III. If this is not possible, then the ISO 22000 requirements shall prevail.

Certification Programmes requiring Certification Bodies to operate according to ISO / IEC 17065 shall ensure they meet the Benchmarking Requirements for applicable sectors outlined in Part III.

The Codex Alimentarius Guidelines on food hygiene and its HACCP annex constitutes an internationally-recognised reference for food business operators and competent authorities to oversee food safety. As such, in addition to the following key elements, the Certification Programme Owner shall ensure that the site has knowledge and align their practices to best industry practices and the Codex Alimentarius General Principles of Food Hygiene.

SECTION 1: HAZARD AND RISK MANAGEMENT SYSTEMS REQUIREMENTS

REFERENCE	ELEMENT	THE STANDARD SHALL REQUIRE THAT
HACCP 1.1	Hazard and Risk Management System	A systematic, Hazard and Risk Management System (or HACCP system) based on the current version of Codex Alimentarius General Principles of Food Hygiene shall be implemented to identify specific hazards, the measures for their control shall be based on scientific evidence of risk to health. This system shall take all relevant laws into consideration.
HACCP 1.2	Hazard and Risk Management System	The scope of the Hazard and Risk Management System (or HACCP system) and applicable prerequisite programmes shall be clearly defined in accordance with the product(s)/activities undertaken at the site and included within the sites scope of certification.
HACCP 1.3	Hazard and Risk Management System	The prerequisite programmes shall be designed, established and verified where possible, to support the application and implementation of the Hazard and Risk Management System (or HACCP system)
HACCP 1.4	Hazard and Risk Management System	There shall be commitment from senior management for implementation of an effective Hazard and Risk Management System (or HACCP system).
HACCP 1.4.1	Hazard and Risk Management System	Appropriate knowledge and expertise for the development of an effective Hazard and Risk Management System (or HACCP system) shall be used.
HACCP 1.4.2	Hazard and Risk Management System	The Hazard and Risk Management System (or HACCP system) shall be reviewed regularly and updated when there is a significant change that could introduce new hazards and/or control measures.

SECTION 2: FOOD SAFETY MANAGEMENT SYSTEMS REQUIREMENTS

REFERENCE	ELEMENT	THE STANDARD SHALL REQUIRE THAT
FSM 1	Management Responsibility	A clear organisational structure identifying the job functions and responsibilities of at least those employees whose activities affect food safety shall be established, implemented and maintained.
FSM 2	Management Commitment and Food Safety Culture	A commitment from senior management to establish direction, engage personnel, and provide sufficient resources to maintain a positive food safety culture and continuously improve the Food Safety Management System shall be provided.
FSM 2.1	Food Safety Culture	A demonstrable commitment from all personnel to the production and safe handling of food shall be available.
FSM 2.2	Food Safety Culture	A food safety culture assessment plan shall be established, implemented and maintained to identify areas of improvement to drive a positive behaviours. This shall include elements consisting of at a minimum: communication, training, feedback from employees and performance measurement on food safety related activities.
FSM 3	Management Review	The senior management shall review all elements of the Food Safety Management System, including Food safety culture plan, the Hazard and Risk Management System (HACCP plan or HACCP-based plans) regularly, and in case of any change that impacts food safety, to ensure their continuing suitability and effectiveness.
FSM 4.2	Food Safety Legislation	Procedures shall be established, implemented and maintained to ensure that suppliers' activities and food comply with applicable legislation (in both countries of production and intended sale).
FSM 5	Food Safety Management System	The elements of the Food Safety Management System shall be established, implemented, maintained and continuously improved and shall have a scope appropriate to the range of business activities to be covered.

FSM 6	Food Safety Policy and Objectives	A clear, concise and documented food safety policy statement shall be in place, as well as measurable objectives specifying the extent of the organisation's commitment to meet the food safety needs.
FSM 7.1	Food Defence	A food defence threat assessment procedure shall be established, implemented and maintained to identify potential threats and prioritise food defence measures.
FSM 7.1.1	Food Defence	The agent/broker shall ensure that their suppliers have established, implemented and maintained a food defence threat assessment procedure to identify potential threats and prioritise food defence measures.
FSM 7.2.1	Food Defence	The agent/broker shall ensure that their suppliers have a documented food defence plan in place specifying the measures implemented to mitigate the public health risks from any identified food defence threats.
FSM 7.3.1	Food Defence	The agent/broker shall ensure that their suppliers' food defence plan is developed, implemented, verified, maintained and reviewed on regular basis or when a new threat is established.
FSM 7.4	Food Defence	Appropriate knowledge and expertise for the development and maintenance of an effective food defence threat assessment plan shall be used.
FSM 8.2	Food Fraud	A documented food fraud management plan shall be in place specifying the measures implemented to mitigate the public health risks from the identified food fraud vulnerabilities.
FSM 8.3	Food Fraud	This food fraud management plan shall be developed, implemented, verified, maintained and reviewed on regular basis or when a new vulnerability is established.
FSM 8.4	Food Fraud	The agent/broker shall ensure that their suppliers comply to key elements FSM 8.1, 8.2, 8.3.
FSM 8.5	Food Fraud	Appropriate knowledge and expertise for the development and maintenance of an effective food fraud assessment plan shall be used.

FSM 9.1	Documentation Requirements	A procedure shall be established, implemented and maintained for the management and control of documented information required to demonstrate the effective operation and control of processes and the Food Safety Management System.
FSM 10.1	Specified Requirements/ Specifications	Specified requirements or specifications shall be established, implemented and maintained for all inputs to the process, including services that are purchased or provided and have an effect on food safety. Microbiological, physical, chemical and allergenic specifications used for food safety purposes shall be based on appropriate scientific principles.
FSM 10.2	Specified Requirements/ Specifications	A review process of the specified requirements or specifications shall be in place.
FSM 11	Procedures	Effective procedures and instructions shall be established, implemented and maintained for all processes and operations having an effect on food safety.
FSM 12	Resource Management	The resources needed to establish, implement, maintain, review and improve the Food Safety Management System shall be identified and assigned.
FSM 13.1.2	Purchasing and Supplier Performance	A purchasing procedure shall be established, implemented and maintained to ensure that all inputs to the process, including externally purchased materials and services which have an effect on food safety, conform to specified requirements or specifications as well as food safety and regulatory requirements.
FSM 13.2.1	Purchasing and Supplier Performance	A procedure for the evaluation, approval and continued monitoring of suppliers which have an effect on food safety shall be established, implemented and maintained. The procedure shall address procurement in emergency situations to ensure that food still conforms to the documented specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded.
FSM 13.3	Purchasing and Supplier Performance	Outsourced processes that may have an effect on food safety shall be identified and controlled. Such controls shall be documented in the Food Safety Management System.

FSM 14.1.1	Traceability	Procedures shall be established, implemented and maintained to ensure product identification from the supplier (minimum one step back) through any processes undertaken to the recipient of the food (minimum one step forward).
FSM 14.2	Traceability	Documented tests of the traceability system shall be undertaken to ensure this is operating effectively.
FSM 18.1.1	Product Labelling and Product Information	Finished product shall be labelled to ensure safe use of food, in compliance with the applicable food safety legislation in the country of intended sale.
FSM 18.2	Product Labelling and Product Information	When product is unlabelled, all relevant product information shall be made available to ensure the safe use of the food by the customer or consumer.
FSM 20	Internal Audit	An internal audit procedure shall be established, implemented and maintained; it shall cover all elements of the Food Safety Management System.
FSM 21	Complaint Handling	A procedure for the management of complaints and complaint data shall be established, implemented and maintained to ensure that complaints are assessed and corrective actions implemented, when necessary.
FSM 22	Serious Incident Management	An incident management procedure, including product recall and withdrawal, shall be established, implemented and maintained. The recall procedure shall be regularly tested for effectiveness.
FSM 23	Product Release	A product release procedure shall be established, implemented and maintained.
FSM 24.1	Control of Non-conformity	A procedure shall be established, implemented and maintained to ensure that any non-conformity impacting food safety and any non-conforming products are clearly identified and controlled to prevent unintended use or delivery.
FSM 25	Corrective Actions	A procedure shall be established, implemented and maintained for the determination and implementation of corrective actions in the event of any significant non-conformity relating to food safety.