



GFSI BENCHMARKING REQUIREMENTS

KEY CHANGES VERSION 2020.1 to VERSION 2024

NEW ELEMENTS

INTRODUCTION

This document provides an overview of key updates to Parts I, II, III, and the Glossary of the GFSI Benchmarking Requirements (BMR). These updates are categorised under two main headings: New Elements and Strengthened Elements. The revision of the BMRS requirements was driven by several critical factors, including:

- **Alignment with International Standards:** Updates have been made to align with the Codex General Principles of Food Hygiene, ensuring consistency with global food safety standards.
- **GFSI Benchmarking Improvements:** Revisions include updated eligibility criteria, streamlined benchmarking durations, clarified roles and responsibilities, clarification on application process and sanctioning procedures.
- **Food Safety Culture:** A stronger focus has been placed on integrating "food safety culture"

into management systems, highlighting its vital importance and alignment with Codex requirements on Food Safety Culture.

- **Multi-Site Certification Audits:** Clearer definitions of "Central Function" have been provided, along with new and updated definitions for single-site and multi-site certification, improving the overall understanding and applicability of multi-site certification option.

Additionally, we have published a **BRAND NEW** Implementation Handbook designed to provide detailed guidance and clarity on the requirements. This comprehensive resource outlines key steps, best practices, and examples to ensure a smooth and successful implementation process. Whether you're new to the Benchmarking requirements or looking for deeper insights, the handbook serves as a practical tool to support your efforts.

Part I: The GFSI Benchmarking Process

General updates:

- Duplications removed, resulting in a more concise document.
- Roles of the GFSI team and Steering Committee (Steerco) clarified to resolve decision-making confusion.
- Grammar and sentence structure improved where required. Major revision planned for the next iteration.
- Aligned content with actual processes rather than outdated expectations eg: Section 3 & 6.
- Added cross-references to relevant sections where necessary.
- Incorporated references to Governance Rules, Antitrust statutes, and the Code of Ethical Conduct.

Section specific

Section 1: Eligibility Criteria

- Removed: CPO not governed or owned by public or government entity.
- Removed: Ten valid certificates required for each scope of recognition.
- Amended CB requirement.
- Removed: 12 month CPO operational requirement.

Section 3: Application Requirements for GFSI Recognition (renamed from Application Option)

- Section rewritten.

Section 6: Sanctioning

- Section rewritten.



Part II: Requirements for the Governance of Certification Programmes

General updates:

- Added references to Governance Rules, Antitrust statutes, and the Code of Ethical Conduct

PART III: Requirements for the Content of Standards

The Codex Alimentarius Guidelines on food constitutes the 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.

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
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	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.
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 behaviour. This shall include elements consisting of at a minimum: communication, training, feedback from employees and performance measurement on food safety related activities.
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 8.5	Food Fraud	Appropriate knowledge and expertise for the development and maintenance of an effective food fraud assessment plan shall be used.
FSM 19.4	Cleaning and Disinfection Programme	Cleaning and disinfection programmes shall be established, implemented and maintained. Measures shall be in place to verify the effectiveness of the cleaning and disinfection programme.
FSM 27	Change Management	A documented change management procedure shall be established, with particular emphasis on changes that could impact food safety.

Part IV: Glossary of Terms

General updates:

- New definitions added in, and some existing ones updated.

STRENGTHENED ELEMENTS

Part II: Requirements for the Governance of Certification Programmes.

SECTION 1: Ownership, Development and Maintenance

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
1.1	Ownership	The Certification Programme Owner shall be a legal entity.
1.7	Product Labelling	The Certification Programme shall specify the use of off-product logo or mark and ensure that Certification Bodies communicate those rules to applicant / certified organisations.
1.10	Certification Programme Development and Maintenance	The Certification Programme shall be subjected to stakeholder consultation during its development.
1.10	Certification Programme Development and Maintenance	The Certification Programme Owner shall inform key stakeholders, including GFSI, of any changes to the Certification Programme, in particular all those changes that may impact the recognition status of the Certification Programme. (See Glossary for Reportable incidents to GFSI).

1.21	Data Management	<p>The Certification Programme Owner shall ensure that the data management system shall incorporate data in relation to the GFSI Benchmarking Requirements and the annual assessment questionnaire. This system shall allow to estimate as a minimum:</p> <ul style="list-style-type: none"> • Number of auditors approved to audit against the recognised programme by region; • Number of valid certificates; • Number of issued certificates within a given period; • Number of suspended certificates; • Number of withdrawn certificates.
------	-----------------	---

SECTION 2: Accreditation

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
2.1	Certification Process	The Certification Programme shall include a certification process based on one of the following standards: ISO / IEC 17065 for product Certification Bodies or ISO / IEC 17021-1 with ISO 22003-1 for management system Certification Bodies.
2.4 to 2.7		DELETED
2.8	Relationship with Accreditation Bodies	<p>The Certification Programme Owner shall have a process in place for communication exchange with the Accreditation Bodies:</p> <ul style="list-style-type: none"> • relevant information and developments related to the Certification Programme; • extending Certification Bodies' scope of activities. <p>Withdrawal or suspension of Certification Bodies for reasons related to accreditation standard.</p>
2.9		DELETED
2.10	Certification Bodies List	The Certification Programme Owner shall ensure that a list of active Certification Bodies is publicly available without request.
2.12	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that all activities resulting in the issuing of certificates are delivered by Certification Bodies accredited by Accreditation Bodies members of the International Accreditation Forum (IAF) and signatories to the Multilateral Recognition Arrangement (MLA) for the appropriate scope.

2.15 & 2.16		DELETED
2.18	Accreditation of Certification Bodies	In the event that accreditation is not granted within 12 months or, in situations where there is a delay, the Certification Body shall provide a plan to the Certification Programme Owner for approval to achieve accreditation and any potential impact on GFSI Recognition shall be highlighted to the GFSI Senior Technical Manager.
2.20	Accreditation of Certification Bodies	In the event that the range of certification services offered by a Certification Body is wider than the range of those accredited, the Certification Programme Owner shall mandate that the Certification Body makes clearly and publicly available the scope of their accreditation.

SECTION 3: Relationship with Certification Bodies

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
3.7	Relationship with Certification Bodies	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any situations which could result in bringing their Certification Programme or GFSI into disrepute, and notify GFSI of such situation (See Glossary for Reportable incidents to GFSI).
3.13	Office Visits	<p>The Certification Programme Owner shall implement a risk-based programme of Certification Bodies office audits, focusing on the implementation of the Certification Programme's requirements by the Certification Bodies.</p> <p>Risk factors may include:</p> <ul style="list-style-type: none"> • the number of countries in which a Certification Body operates; • the number of auditors employed; • languages in which audits are undertaken; • number of certified companies; • number of centralised Certification Body offices; • number of audits undertaken per auditor; • grading and number of non-conformances; • management and notification of product recalls to Certification Programme Owner.

SECTION 4: Certification Bodies Personnel

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that a system is in place to ensure all personnel involved in the certification process meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.
4.2	Certification Body Personnel Competence	<p>The Certification Programme Owner shall ensure that the Certification Bodies require all personnel involved with the certification process to sign a contract or agreement, which clearly commits them to:</p> <ul style="list-style-type: none"> • Complying with the rules of the Certification Body, with particular reference to confidentiality, impartiality and independence from commercial or personal interests; • Declaring any issues in relation to personal conflicts of interest.
4.3	Certification Body Personnel Competence	The Certification Programme Owner shall mandate that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO 22003-1, and IAF MD4, relating to personnel and make them known to their employees. This shall include systems and procedures to ensure that auditors conducting assessments meet the capabilities described in ISO / IEC 17065 or ISO / IEC 17021-1 with ISO 22003-1 and the requirements of IAF MD4.
4.4	Certification Body Personnel Competence	<p>The Certification Programme Owner shall ensure that the Certification Bodies hold and maintain records regarding the qualifications, training and experience of all personnel involved in the certification process. All records shall be dated. The information shall include, as a minimum:</p> <ul style="list-style-type: none"> • Name of trainees; • Affiliation to the Certification Body and position held; • Educational qualifications and professional status; • Experience and training in the relevant fields of competence in relation to the Certification Programme's requirements; • Details of performance appraisal(s).
4.6	Auditor Behaviour	The Certification Programme Owner shall ensure that the Certification Bodies have a system in place to ensure auditors conduct themselves in a professional manner. This shall be evaluated through a defined witness audit process confirming acceptable auditor performance as specified by the Certification Programme Owner.

4.8	Auditors' Industry Experience	The Certification Programme Owner shall ensure that Certification Bodies appoint auditors with experience in the food or associated industry, including at least two years full time work in food safety functions and requirements defined in table 1, column 4.
4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending their scope of activity to undergo a programme including training in the new sector, supervised audits as per 4.10 and assessment and sign off as competent in the new sector by the Certification Body.
4.16	Auditor Register	The Certification Programme Owner shall have in place a register of approved auditors including the details of the auditors' competence, education, relevant experience and scope(s) of activities, and applicable Certification Bodies. The register shall remain current and be made available to GFSI upon request.

SECTION 5: Management of Audit and Certification

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
5.5	Audit Programme – Audit Frequency	Irrespective of the defined minimum audit frequency, the Certification Programme Owner shall ensure that the Certification Bodies undertake additional audits if there is evidence or suspicion that the integrity of the Certification is at risk within a certified organisation.
5.13	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that all audit reports are only released at the discretion of the contracted organisation. Ownership of the audit report, determination of details made available and authorisation for access shall remain with the contracted organisation.
5.28	Management of Certification	The Certification Programme Owner shall ensure that Certification Bodies have agreements in place with certified organisations ensuring that the Certification Programme Owner is informed of any significant public food safety incidents, such as significant regulatory food safety non-conformities, product recalls.

SECTION 6: Multi-site Certification

Only the following scopes of recognition may be considered for certification of multi-site organisations, based on a sampling of the sites:

- AI Farming of Animals for Meat/Milk/Eggs/Honey
- All Farming of Fish And Seafood
- BI Farming of Plants (Other Than Grains and Pulses)
- BII Farming of Grains and Pulses
- BIII Pre-Process Handling of Plant Products, Nuts and Grains
- G Provision of Storage and Distribution Services

It shall be stressed that certification of multi-site organisations based on sampling is not compulsory for a Certification Programme Owner within these scopes of recognition and a Certification Programme Owner may opt for single site certification only.

Where a Certification Programme Owner permits the use of certification of multi-site organisations based on sampling then the Certification Programme shall satisfy the below GFSI Benchmarking Requirements.

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
6.2	General Requirements	The Certification Programme Owner shall clearly specify the conditions for certification of multi-site organisations based on sampling for eligible scopes.
6.3	General Requirements	All sites included in the scope of certification of a multi-site organisation shall operate under the same Food Safety Management System and under the control of a central function.
6.8	Central Function	The central function shall ensure management commitment to the system / integrity and clearly describe the roles and responsibilities of management, internal auditors and other members of the organisation. The central function shall be separate from the sites.
6.14	Internal Audit	An internal audit programme based on site and risk profile shall be in place and undertaken by the central function. This programme shall ensure audits of all sites within the scope of certification, the central function and the Food Safety Management System at least annually.
6.19	Internal Audit	Internal auditors shall be assigned by the central function that are independent to the sites to ensure impartiality.

6.21	Site Audit Sampling	<p>The Certification Programme Owner shall have a system in place for the Certification Bodies to define a risk-based sampling programme that includes a minimum sample size determined by the Certification Programme Owner.</p> <p>The sampling programme shall include provisions to increase sample size based on various risk factors (e.g., audit scope, types of activities on-site, findings of the central management system audit, findings at sampled sites, customer requirements, etc.), size of the group or multi-site organisation and the internal structure as per IAF MD1.</p>
6.22	Site Audit Sampling	<p>The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1.</p>
6.23	Site Audit Sampling	<p>The annual sampling size of the Certification Body audit sampling programme shall be based on IAF MD1 current version. The square root sample of the Certification Body's audit of the sites shall be calculated per risk category.</p> <p>The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1.</p>
6.24	Site Audit Sampling	<p>The programme shall be partly selective and partly non-selective, but at least 25% of the sample shall be randomly selected from the total number of sites. Selected sites shall be identified based on the organisation's internal audit programme findings and the site risk profiles as per IAF MD 1.</p>
6.25	Management of Non-conformities	<p>Non-conformities found on sites shall be assessed to ascertain if these indicate an overall Food Safety System deficiency and therefore may be applicable to all or other sites. If non-conformities relate to all or other sites, corrective action shall be undertaken and verified both by the central function and by the Certification Body as per IAF MD1.</p>
6.26	Management of Non-conformities	<p>In the event that non-conformities are found when auditing sites, which may not jeopardise certification but may raise concerns on conformity of the organisation, the Certification Body shall increase the sample size to ensure adequate confidence in the conformity of the organisation as per IAF MD 1.</p>
6.28	Site Audit Sampling	<p>A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall be risk assessed to determine their eligibility for multi-site or group certification.</p>

PART III: Requirements for the Content of Standards

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
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 1.1.1 to HACCP 1.1.4		DELETED
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 1.5	Hygienic Design Process	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade or improvements.
HACCP 1.6	Hygienic Design Process	The hygienic design and suitability of new and existing buildings and equipment shall be assessed throughout their life cycle from the design concept, through construction, purchasing and during use, until the end of their intended life.
HACCP 1.9.2	Intended Use	The intended use of the building/equipment shall be described, as a specification for the intended purchase or construction of new buildings and equipment.
HACCP 1.11	Hygienic Design Principles	Buildings and equipment shall be of a hygienic design, to meet all cleaning objectives.

FSM 2	Management Commitment	A commitment from senior management to establish direction, engage personnel, and provide sufficient resources to maintain a positive food safety culture and continuously improve Food Safety Management System shall be provided.
FSM 3	Management Review	The senior management shall review all elements of the Food Safety Management System, including the Food Safety Culture plan, the Hazard and Risk Management System (or 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 7.3	Food Defence	This food defence plan shall be developed, implemented, verified, maintained and reviewed on regular basis or when a new threat is established.
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 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 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 16.1	Allergen Management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross-contact, implemented controls to reduce or eliminate that risk, and labelling of the food in compliance with the allergen labelling legislation in the country of intended sale.
FSM 16.2	Allergen Management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross-contact implemented controls to reduce or eliminate that risk.

FSM 26	Change Management	Change control shall be undertaken and documented to evaluate the impacts of any changes/modifications on equipment/building hygienic design and ensure that the organisation is equipped to ensure food safety during temporary, emergency and unplanned changes.
GMP 3	Design, Construction, Layout and Flow of Operations	<p>The site, both the exterior and the interior, shall be designed, constructed and maintained to minimise food safety risks.</p> <p>The layout and flow of operations shall be suitable for the intended purpose and designed in line with hygienic design principles to minimise food safety risks.</p>
GMP 4.11	Product Contamination Risk and Segregation	Following purchase (and installation), all buildings and equipment shall be cleaned/commissioned by the user before they are used for the processing of food. Cleaning activities shall should be recorded and verified.
GMP 6.2	Personal Hygiene, Protective Clothing and Medical Screening	Suitable protective clothing and footwear shall be provided to minimise food safety risks.
GMP 7	Training	Procedures shall be established, implemented and maintained to ensure that all employees including temporary workers and subcontractors are trained, and retrained as necessary to have an understanding in food safety, commensurate with their activity.
GMP 8.11	Housekeeping, Cleaning and Disinfection	<p>Procedures for housekeeping, cleaning and disinfection shall be established, implemented and maintained. Their effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity.</p> <p>Cleaning activities shall not represent a food safety risk.</p>
GMP 12.1	Waste Management	A procedure shall be established, implemented and maintained for the collection, storage and disposal of waste material, including waste water and drainage ensuring they do not pose any food safety risks.
GMP 15	Transport	All containers and vehicles used for transportation in a way that could impact food safety shall be designed, constructed, monitored and maintained to minimise food safety risks. They shall be suitable for the intended purpose.
GAP 3.3	Location, Design and Layout	The site facility shall be fenced and the entry points controlled. For e.g. by lockable gates.

GAP 3.8.1	Location, Design and Layout	The systems described under GAP 3.7 shall be designed and constructed to avoid potential for contamination of water courses, highways and neighbouring fields with animal waste, residual agricultural chemicals and silo seepage.
GAP 4.3	Prevention of Cross-contamination	Feed shall be stored securely and handled to prevent cross contamination for e.g. separately from waste liquids, untreated manure, hazardous substances, veterinary medication and cleaning chemicals.
GAP4.4.1	Prevention of Cross-contamination	Procedures shall be in place to ensure that the application of agricultural and veterinary inputs is managed properly to minimise the potential for contamination.
GAP4.4.2	Prevention of Cross-contamination	Procedures shall be in place to ensure that the application of aquaculture and veterinary inputs is managed properly to minimise the potential for contamination.
GAP 5	Employee Facilities	Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed, maintained, cleaned and operated to minimise food safety risks.
GAP 6.1	Personnel Health and Hygiene	Personnel hygiene standards shall be established, implemented and maintained to minimise food safety risks.
GAP 6.2	Personnel Health and Hygiene	Where necessary suitable protective clothing and footwear shall be provided to minimise food safety risks.
GAP 9	Site Inspections/ Checks	A programme of site inspections and checks shall be established, implemented, and maintained to confirm that these activities occur at a frequency based on risk and any significant changes that may impact food safety. The programme shall cover the site and equipment to ensure they are maintained in a condition suitable for safeguarding food safety, are relevant to the site's activities and verify that inspections and checks are conducted as required.
GAP 11.1	Water Quality	Indoor primary production facilities shall maintain a supply of water fit for its purpose and that does not compromise food safety, for handwashing, irrigation, equipment and post-harvest washing, with appropriate facilities for its storage, and distribution.
GAP 18.2	Equipment	Equipment shall be used, maintained, transported and stored to minimise food safety risk.