Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	Concerning agreement see comment in Part II.	Misunderstood
AB 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.	Requiring just 1 CB should not be possible, mantain 2 as the minimum.	Agree
AB 1	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Not replace to "working days", as this can change among different places.	Misunderstood
AB 1	Part II	2.4	Relationship with Accreditation Bodies	The Certification Programme Owner shall establish regular exchanges and communication with their respective Accreditation Bodies. This shall include an agreement with the Accreditation Bodies to ensure accredited Certification Bodies comply with the requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003.		All references to ISO/TS 22003 should be updated to ISO 22003-1	Agree
AB 1	Part II	2.6	Relationship with Accreditation Bodies	The Certification Programme Owner shall have an agreement with the Accreditation Bodies to ensure that the Certification Programme Owner is informed if a Certification Body has its accreditation withdrawn or suspended.		For some Accreditation Bodies is really difficult to sign an agreement with CPO.	Opportunity Identified
AB 1	Part II	2.9	Relationship with Accreditation Bodies	The Certification Programme Owner shall agree on their process for the extension of the scope of activities of Certification Bodies with the Accreditation Bodies.		Accreditation Bodies are the one who has the responsability to establish the process for the extension of the accreditation scope of Certification Bodies.	Opportunity Identified
AB 1	Part II	2.14	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies shall be publicly available and precisely defined in terms of the exact name of the Certification Programme in scope, its revision number and / or date and its sector of application reference (e.g. industry sector).		If the normative document has been revised just for minor issues, and it is publisdhed as for instance revision 3.2, there is no need to update the accreditation scope, so it is proposed to include "**major** revision number".	Opportunity Identified
AB 1	Part II	2.15	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies undertaking audits against a GFSI-recognised Certification Programme have the named Certification Programme and its revision number included in their scope of accreditation.		If the normative document has been revised just for minor issues, and it is publisdhed as for instance revision 3.2, there is no need to update the accreditation scope, so it is proposed to include "**major** revision number".	Opportunity Identified
AB 1	Part II	2.16	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the accreditation standard used by all Accreditation Bodies for their Certification Programme is consistent and, where appropriate, facilitates a harmonised agreement on behalf of the contracted Certification Bodies.		Further clarification needed	Opportunity Identified
AB 1	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		Reference to IAF MD25 should also be included	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 1	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	In many cases the country of sale may not be known during Certification Body Assessment. Don´t change .	Agree
AB 1	Part IV Glossary	Glossary	Competence	Ability to apply knowledge and skills to achieve intended results.	ISO/ IEC 19011 ISO/ IEC 9000	Replace by ISO 19011 ISO 9000	Agree
AB 1	Part IV Glossary	Glossary	Complaint	Expression of dissatisfaction made to an organisation, related to its product or service, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.	ISO / IEC 9000	Replace by ISO 9000	Agree
AB 1	Part IV Glossary	Glossary	Correction	Action to eliminate a detected nonconformity.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 1	Part IV Glossary	Glossary	Corrective action	Action to eliminate the cause of a nonconformity and to prevent recurrence.	ISO / IEC 9000	Replace by ISO 9000	Agree
AB 1	Part IV Glossary	Glossary	Customer	Person or organisation that could or does receive a product or a service that is intended for or required by this person or organisation.	ISO / IEC 9000	Replace by ISO 9000	Agree
AB 1	Part IV Glossary	Glossary	Feed	Single or multiple products, whether processed, semi-processed or raw, which is intended to be fed to food-producing animals.	ISO / IEC 22000 CAC / GL 81 2013	Replace by ISO 22000	Agree
AB 1	Part IV Glossary	Glossary	Food	Substance (ingredient), whether processed, semi-processed or raw, which is intended for consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of “food” but does not include cosmetics or tobacco or substances (ingredients) used only as drugs. Umbrella term for any product in the GFSI scope, i.e. packaging, feed, etc.	ISO / IEC 22000 CAC / GL 81 2013	Replace by ISO 22000	Agree
AB 1	Part IV Glossary	Glossary	Food safety	Assurance that any product within the GFSI scopes of recognition (e.g. food, packaging, feed, etc.) will not cause an adverse health effect for the consumer when it is prepared and/or consumed and/or used according to its intended use. Umbrella term to define any product which is subject to GFSI scope of recognition.	CAC / RCP 1-1969 ISO / IEC 22000	Replace by ISO 22000	Agree
AB 1	Part IV Glossary	Glossary	Food Safety Management System	Set of interrelated or interacting elements to establish policy and objectives and to achieve those objectives, used to direct and control an organisation with regard to food safety.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 1	Part IV Glossary	Glossary	Monitoring	Determining the status of a system, a process or an activity.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 1	Part IV Glossary	Glossary	Non-conformity	Non-fulfilment of a requirement.	ISO/ IEC 19011 ISO/ IEC 9000	Replace by ISO 19011 ISO 9000	Agree
AB 1	Part IV Glossary	Glossary	Organisation	Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 1	Part IV Glossary	Glossary	Procedure	Specified way to carry out an activity or a process.	ISO / IEC 9000	Replace by ISO 9000	Agree
AB 1	Part IV Glossary	Glossary	Process	Set of interrelated or interacting activities which transforms inputs to outputs.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 1	Part IV Glossary	Glossary	Product	Output that is a result of a process.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 1	Part IV Glossary	Glossary	Specification	Document stating requirements.	ISO / IEC 9000	Replace by ISO 9000	Agree
AB 1	Part IV Glossary	Glossary	Validation	Obtaining evidence that a control measure (or combination of control measures) will be capable of effectively controlling the significant food safety hazard.	ISO / IEC 22000	Replace by ISO 2000	Agree
AB 1	Part IV Glossary	Glossary	Verification	Confirmation, through the provision of objective evidence, that specified requirements have been fulfilled.	ISO / IEC 22000	Replace by ISO 2000	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	Concerning agreement see comment in Part II.	Misunderstood
AB 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Requiring just 1 CB should not be possible, maintain 2 as the minimum.	Agree
AB 2	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Not replace to "working days", as this can change among different places.	Misunderstood
AB 2	Part II	2.4	Relationship with Accreditation Bodies	The Certification Programme Owner shall establish regular exchanges and communication with their respective Accreditation Bodies. This shall include an agreement with the Accreditation Bodies to ensure accredited Certification Bodies comply with the requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003.		All references to ISO/TS 22003 should be updated to ISO 22003-1	Agree
AB 2	Part II	2.6	Relationship with Accreditation Bodies	The Certification Programme Owner shall have an agreement with the Accreditation Bodies to ensure that the Certification Programme Owner is informed if a Certification Body has its accreditation withdrawn or suspended.		For some Accreditation Bodies is really difficult to sign an agreement with CPO. If this only concerns informing in case of suspension of withdrawal this should be possible, yet without the reason.	Opportunity Identified
AB 2	Part II	2.9	Relationship with Accreditation Bodies	The Certification Programme Owner shall agree on their process for the extension of the scope of activities of Certification Bodies with the Accreditation Bodies.		Accreditation Bodies are the one who has the responsability to establish the process for the extension of the accreditation scope of Certification Bodies, unless described in the scheme for example witnesses	Opportunity Identified
AB 2	Part II	2.14	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies shall be publicly available and precisely defined in terms of the exact name of the Certification Programme in scope, its revision number and / or date and its sector of application reference (e.g. industry sector).		If the normative document has been revised just for minor issues, and it is published as for instance revision 3.2, there is no need to update the accreditation scope, so it is proposed to include "major revision number".	Opportunity Identified
AB 2	Part II	2.15	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies undertaking audits against a GFSI-recognised Certification Programme have the named Certification Programme and its revision number included in their scope of accreditation.		If the normative document has been revised just for minor issues, and it is published as for instance revision 3.2, there is no need to update the accreditation scope, so it is proposed to include "major revision number".	Opportunity Identified
AB 2	Part II	2.16	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the accreditation standard used by all Accreditation Bodies for their Certification Programme is consistent and, where appropriate, facilitates a harmonised agreement on behalf of the contracted Certification Bodies.		Further clarification needed	Opportunity Identified
AB 2	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		Reference to IAF MD25 should also be included	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 2	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	In many cases the country of sale may not be known during Certification Body Assessment. Don´t change .	Agree
AB 3	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	Concerning agreement see comment in Part II.	Misunderstood
AB 3	Part II	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 / TS 22003 for management system Certification Bodies.		All references to ISO/TS 22003 should be updated to ISO 22003-1	Couldn't reach consensus
AB 3	Part II	2.4	Relationship with Accreditation Bodies	The Certification Programme Owner shall establish regular exchanges and communication with their respective Accreditation Bodies. This shall include an agreement with the Accreditation Bodies to ensure accredited Certification Bodies comply with the requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003.		All references to ISO/TS 22003 should be updated to ISO 22003-1	Couldn't reach consensus
AB 3	Part II	2.6	Relationship with Accreditation Bodies	The Certification Programme Owner shall have an agreement with the Accreditation Bodies to ensure that the Certification Programme Owner is informed if a Certification Body has its accreditation withdrawn or suspended.		For some Accreditation Bodies is really difficult to sign an agreement with CPO.	Opportunity Identified
AB 3	Part II	2.8	Relationship with Accreditation Bodies	The Certification Programme Owner shall inform Accreditation Bodies of any relevant information and developments related to the Certification Programme.		In case of new versions of the standard, inform the ABs before starting the transition period, to allow the ABs to complete the evaluations on the standard	Opportunity Identified
AB 3	Part II	2.9	Relationship with Accreditation Bodies	The Certification Programme Owner shall agree on their process for the extension of the scope of activities of Certification Bodies with the Accreditation Bodies.		Accreditation Bodies are the one who has the responsability to establish the process for the extension of the accreditation scope of Certification Bodies. In case, requirements on these issues should be added into the standard.	Opportunity Identified
AB 3	Part II	2.14	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies shall be publicly available and precisely defined in terms of the exact name of the Certification Programme in scope, its revision number and / or date and its sector of application reference (e.g. industry sector).		If the normative document has been revised just for minor issues, and it is published as for instance revision 3.2, there is no need to update the accreditation scope, so it is proposed to include "**major** revision number".	Opportunity Identified
AB 3	Part II	2.15	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies undertaking audits against a GFSI-recognised Certification Programme have the named Certification Programme and its revision number included in their scope of accreditation.		If the normative document has been revised just for minor issues, and it is published as for instance revision 3.2, there is no need to update the accreditation scope, so it is proposed to include "major revision number".	Opportunity Identified
AB 3	Part II	2.16	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the accreditation standard used by all Accreditation Bodies for their Certification Programme is consistent and, where appropriate, facilitates a harmonised agreement on behalf of the contracted Certification Bodies.		Further clarification needed	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 3	Part II	3.1	Relationship with Certification Bodies	The Certification Programme Owner shall have contractual and enforceable arrangements with all Certification Bodies accredited to ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003 to operate their Certification Programme.		All references to ISO/TS 22003 should be updated to ISO 22003-1	Couldn't reach consensus
AB 3	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		Reference to IAF MD25 should also be included	Couldn't reach consensus
AB 3	Part II	3.9	Relationship with Certification Bodies	The Certification Programme Owner shall publish guidance / requirements to Certification Bodies on transition arrangements when a new version of the Certification Programme is issued. The Certification Programme Owner guidance / requirements may encompass elements such as the following: - terms and conditions of transition period between previous and new versions; - defined timeline for transition; - comparative information between previous and new versions; - timeline in which Certification Bodies are required to cascade information to all auditors and certified organisations.		The following point should be added to the list: - validity of old certificates. Share all this information also with the ABs. Provide that transition times are adequate to manage the transition by all interested parties (not too short times).	Couldn't reach consensus
AB 3	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		All references to ISO/TS 22003 should be updated to ISO 22003-1	Couldn't reach consensus
AB 3	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	The requirement is unclear. It is to be considered that once the correction is implemented, the corrective actions can be verified by the certification bodies after the first certification is granted (as defined in §7.4.7 of ISO 17065).	Couldn't reach consensus
AB 3	Part IV Glossary	Glossary	Competence	Ability to apply knowledge and skills to achieve intended results.	ISO/ IEC 19011 ISO/ IEC 9000	Replace by ISO 19011 ISO 9000	Agree
AB 3	Part IV Glossary	Glossary	Complaint	Expression of dissatisfaction made to an organisation, related to its product or service, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.	ISO / IEC 9000	Replace by ISO 9000	Agree
AB 3	Part IV Glossary	Glossary	Correction	Action to eliminate a detected nonconformity.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 3	Part IV Glossary	Glossary	Corrective action	Action to eliminate the cause of a nonconformity and to prevent recurrence.	ISO / IEC 9000	Replace by ISO 9000	Agree
AB 3	Part IV Glossary	Glossary	Customer	Person or organisation that could or does receive a product or a service that is intended for or required by this person or organisation.	ISO / IEC 9000	Replace by ISO 9000	Agree
AB 3	Part IV Glossary	Glossary	Feed	Single or multiple products, whether processed, semi-processed or raw, which is intended to be fed to food-producing animals.	ISO / IEC 22000 CAC / GL 81 2013	Replace by ISO 22000	Agree
AB 3	Part IV Glossary	Glossary	Food	Substance (ingredient), whether processed, semi-processed or raw, which is intended for consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of "food" but does not include cosmetics or tobacco or substances (ingredients) used only as drugs. Umbrella term for any product in the GFSI scope, i.e. packaging, feed, etc.	ISO / IEC 22000 CAC / GL 81 2013	Replace by ISO 22000	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 3	Part IV Glossary	Glossary	Food safety	Assurance that any product within the GFSI scopes of recognition (e.g. food, packaging, feed, etc.) will not cause an adverse health effect for the consumer when it is prepared and/or consumed and/or used according to its intended use. Umbrella term to define any product which is subject to GFSI scope of recognition.	CAC / RCP 1-1969 ISO / IEC 22000	Replace by ISO 22000	Agree
AB 3	Part IV Glossary	Glossary	Food Safety Management System	Set of interrelated or interacting elements to establish policy and objectives and to achieve those objectives, used to direct and control an organisation with regard to food safety.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 3	Part IV Glossary	Glossary	Monitoring	Determining the status of a system, a process or an activity.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 3	Part IV Glossary	Glossary	Non-conformity	Non-fulfilment of a requirement.	ISO/ IEC 19011 ISO/ IEC 9000	Replace by ISO 19011 ISO 9000	Agree
AB 3	Part IV Glossary	Glossary	Organisation	Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 3	Part IV Glossary	Glossary	Procedure	Specified way to carry out an activity or a process.	ISO / IEC 9000	Replace by ISO 9000	Agree
AB 3	Part IV Glossary	Glossary	Process	Set of interrelated or interacting activities which transforms inputs to outputs.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 3	Part IV Glossary	Glossary	Product	Output that is a result of a process.	ISO / IEC 22000	Replace by ISO 22000	Agree
AB 3	Part IV Glossary	Glossary	Specification	Document stating requirements.	ISO / IEC 9000	Replace by ISO 9000	Agree
AB 3	Part IV Glossary	Glossary	Validation	Obtaining evidence that a control measure (or combination of control measures) will be capable of effectively controlling the significant food safety hazard.	ISO / IEC 22000	Replace by ISO 2000	Agree
AB 3	Part IV Glossary	Glossary	Verification	Confirmation, through the provision of objective evidence, that specified requirements have been fulfilled.	ISO / IEC 22000	Replace by ISO 2000	Agree
AB 4	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Steering Committee decision and communicating to the CPO. See as guidance ISO/IEC 17060 clause 6 and 7.	Couldn't reach consensus
AB 4	Part I	6	Sanctioning		*Standalone escalation process to be described - flow diagram*	Sanction process should be transparent including the escalation process. See as guidance ISO/IEC 17060 clause 6 and 7.	Couldn't reach consensus
AB 4	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		Sanction process should be transparent including the escalation process. See as guidance ISO/IEC 17060 clause 6 and 7.	Couldn't reach consensus
AB 4	Part II	1.4	Ownership	The Certification Programme Owner shall not provide any consultancy on their Certification Programme.		.. or any other Certification programme.	Couldn't reach consensus
AB 4	Part II	1.8	Certification Programme Development and Maintenance	The Certification Programme shall be developed and maintained with the participation of technically competent representatives of direct stakeholders, or be subjected to formal review by such parties and subsequently determined as appropriate.		Make reference to ISO/IEC 17060 and ISO/IEC 17007	Couldn't reach consensus
AB 4	Part II	1.23	Internal Review	The operations of the Certification Programme Owner shall be subject to formal annual internal review of its relevance and compliance to internal processes, and, where appropriate, revised.		Change element title to: Certification Programme Owner internal review.	Couldn't reach consensus
AB 4	Part II	1.24	Internal Review	The Certification Programme Owner shall ensure that the formal internal review assesses the management of the Certification Programme, and address any issues or concerns raised by stakeholders.		Change element title to: Certification Programme Owner internal review.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 4	Part II	2.14	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies shall be publicly available and precisely defined in terms of the exact name of the Certification Programme in scope, its revision number and / or date and its sector of application reference (e.g. industry sector).		"Clarify where this needs to be posted. Would not add this as it would restrict way of working"	Misunderstood
AB 4	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	A serious food safety situation is an outbreak. Reporting of recalls should be removed, as not all recalls can be reported to GFSI. .....actions with Certiication Bodies to mitigate any serious food safety situations as defined by regulatory requirements for the country of origim or the sale.	Opportunity Identified
AB 4	Part II	3.11	Integrity Programme	The Certification Programme Owner shall ensure that results of the integrity programme are communicated to and reviewed with the Certification Bodies at least once a year.		Add after certification bodie.. Accreditation bodies...	Couldn't reach consensus
AB 4	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		Remove product recalls from the list of risk factors as recalls by a CO is not a metric linked to the performance of a CB.	Opportunity Identified
AB 4	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	add after once a year. The Key performance indicators shall be communicate to the accreditation body.	Couldn't reach consensus
AB 4	Part II	4.2	Certification Body Personnel Competence	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: - Complying with the rules of the Certification Body, with particular reference to confidentiality and independence from commercial or personal interests; - Declaring any issues in relation to personal conflicts of interest.		add .. impartiality	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 4	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		Replace ISO/TS 22003 to ISO 22003.	Couldn't reach consensus
AB 4	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Change ..auditors will be assessed to … auditor will be evaluated..	Couldn't reach consensus
AB 4	Part II	5.33	Use of ICT during the audit	The remote part of the audit may only be carried out with the mutual agreement of the audited organisation and the Certification Body.		See ISO/IEC TS 17012	Couldn't reach consensus
AB 4	Part II	6.27	Management of non-conformities	If the central function, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including the central function and all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.	Define "critical Certification Programme requirements" or suggest to replace by "leading to major non conformities". Some members suggested " fundamental certification programme requirements".	What is the critical Certification programme requirements?	Couldn't reach consensus
AB 4	Part II	6.21	Site audit sampling	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. 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.	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. 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		Agree
AB 4	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1		Opportunity Identified
AB 4	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1		Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 4	Part II	6.24	Site audit sampling	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.	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 MD1		Opportunity Identified
AB 4	Part II	6.25	Management of non-conformities	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.	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		Opportunity Identified
AB 4	Part II	6.26	Management of non-conformities	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.	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 MD1		Opportunity Identified
AB 4	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	**FSMS 10.1 Part III – the change I think removes the sentence for when there needs to specifications. (unless they intend to add to the sentence)**	Misunderstood
AB 4	Part III FSMS	10.2	Specified requirements / Specifications	A review process of the specified requirements or specifications shall be in place.		**Part III GMP – I wonder if all water used within the factory environment should be portable – wording it as it suggests only when used as an ingredient – I would have thought water being used for product surface cleaning should be portable as well.**	Misunderstood
AB 4	Part III GAP	3.1	Location, design and layout	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning, disinfection and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	**"sanitation rather than disinfection"**	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 4	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	**"indirectly" can be hard to quantify and / or capture.**	Agree
AB 4	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	**Part III GMP – I wonder if all water used within the factory environment should be portable – wording it as it suggests only when used as an ingredient – I would have thought water being used for product surface cleaning should be portable as well.**	Opportunity Identified
AB 4	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.		Opportunity Identified
AB 4	Part IV Glossary	Glossary	Audit	Systematic, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.	ISO/ IEC 19011 ISO/ IEC 9000	Replace ISO/IEC 9000 to ISO 9000 and ISO/IEC 19000 to ISO 19011	Agree
AB 4	Part IV Glossary	Glossary	Auditor	Qualified person who conducts an audit.	ISO/ IEC 19011 ISO/ IEC 9000	Replace ISO/IEC 9000 to ISO 9000 and ISO/IEC 19000 to ISO 19011	Agree
AB 4	Part IV Glossary	Glossary	Competence	Ability to apply knowledge and skills to achieve intended results.	ISO/ IEC 19011 ISO/ IEC 9000	Replace - ISO/IEC 9000 to ISO 9000 - ISO/IEC 19011 to ISO 19011	Agree
AB 4	Part IV Glossary	Glossary	Complaint	Expression of dissatisfaction made to an organisation, related to its product or service, or the complaints-handling process itself, where a response or resolution is explicitly or implicitly expected.	ISO / IEC 9000	Replace ISO/IEC 9000 to ISO 9000	Agree
AB 4	Part IV Glossary	Glossary	Correction	Action to eliminate a detected nonconformity.	ISO / IEC 22000	Replace ISO/IEC 22000 to ISO 22000	Agree
AB 4	Part IV Glossary	Glossary	Corrective action	Action to eliminate the cause of a nonconformity and to prevent recurrence.	ISO / IEC 9000	Replace ISO/IEC 9000 to ISO 9000	Agree
AB 4	Part IV Glossary	Glossary	Customer	Person or organisation that could or does receive a product or a service that is intended for or required by this person or organisation.	ISO / IEC 9000	Replace ISO/IEC 9000 to ISO 9000	Agree
AB 4	Part IV Glossary	Glossary	Feed	Single or multiple products, whether processed, semi-processed or raw, which is intended to be fed to food-producing animals.	ISO / IEC 22000 CAC / GL 81 2013	Replace ISO/IEC 2200 to ISO 22000	Agree
AB 4	Part IV Glossary	Glossary	Food	Substance (ingredient), whether processed, semi-processed or raw, which is intended for consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of "food" but does not include cosmetics or tobacco or substances (ingredients) used only as drugs. Umbrella term for any product in the GFSI scope, i.e. packaging, feed, etc.	ISO / IEC 22000 CAC / GL 81 2013	Replace ISO/IEC 2200 to ISO 22000	Agree
AB 4	Part IV Glossary	Glossary	Food safety	Assurance that any product within the GFSI scopes of recognition (e.g. food, packaging, feed, etc.) will not cause an adverse health effect for the consumer when it is prepared and/or consumed and/or used according to its intended use. Umbrella term to define any product which is subject to GFSI scope of recognition.	CAC / RCP 1-1969 ISO / IEC 22000	Replace ISO/IEC 22000 to ISO 22000	Agree
AB 4	Part IV Glossary	Glossary	Food Safety Management System	Set of interrelated or interacting elements to establish policy and objectives and to achieve those objectives, used to direct and control an organisation with regard to food safety.	ISO / IEC 22000	Replace ISO/IEC 22000 to ISO 22000	Agree
AB 4	Part IV Glossary	Glossary	Monitoring	Determining the status of a system, a process or an activity.	ISO / IEC 22000	Replace ISO/IEC 22000 to ISO 22000	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 4	Part IV Glossary	Glossary	Non-conformity	Non-fulfilment of a requirement.	ISO/ IEC 19011 ISO/ IEC 9000	Replace ISO/IEC 19011 to ISO 19011	Agree
AB 4	Part IV Glossary	Glossary	Normative documents	Documents stating the specified requirements (need or expectation that is stated) such as regulations, standards, and technical specifications. Note: normative documents are part of the Certification Programme.	ISO / IEC 17000	Add ISO 17007	Agree
AB 4	Part IV Glossary	Glossary	Organisation	Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives.	ISO / IEC 22000	Replace ISO/IEC 22000 to ISO 22000	Agree
AB 4	Part IV Glossary	Glossary	Procedure	Specified way to carry out an activity or a process.	ISO / IEC 9000	Replace ISO/IEC 9000 to ISO 9000	Agree
AB 4	Part IV Glossary	Glossary	Process	Set of interrelated or interacting activities which transforms inputs to outputs.	ISO / IEC 22000	Replace ISO/IEC 22000 to ISO 22000	Agree
AB 4	Part IV Glossary	Glossary	Product	Output that is a result of a process.	ISO / IEC 22000	Replace ISO/IEC 22000 to ISO 22000	Agree
AB 4	Part IV Glossary	Glossary	Remote	From a location other than the physical location of the audited organisation.		Add ISO/IEC TS 17012	Agree
AB 4	Part IV Glossary	Glossary	Specification	Document stating requirements.	ISO / IEC 9000	Replace ISO/IEC 9000 to ISO 9000	Agree
AB 4	Part IV Glossary	Glossary	Validation	Obtaining evidence that a control measure (or combination of control measures) will be capable of effectively controlling the significant food safety hazard.	ISO / IEC 22000	Replace ISO/IEC 22000 to ISO 22000	Agree
AB 4	Part IV Glossary	Glossary	Verification	Confirmation, through the provision of objective evidence, that specified requirements have been fulfilled.	ISO / IEC 22000	Replace ISO/IEC 22000 to ISO 22000	Agree
AB 5	Part II	2.17	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies seeking accreditation for the Certification Programme shall be accredited within 12 months from the date of application to an Accreditation Body.		What does clause 2.17 mean? Since accreditation is granted by an accreditation body, it is not possible to ensure that the CPO will grant accreditation within 12 months.	Misunderstood
AB 5	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	We support the WG members' comments.	Opportunity Identified
AB 5	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	It is an excessive request to the certification body to assess, as part of the certification audit, whether the relevant laws and regulations of the country to which the organization exports are being met.	Agree
AB 5	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	If the scheme owner chooses ISO/IEC 17021-1 as the certification process, this is inconsistent with the provision in ISO/IEC 17021-1 clause 9.8.4.1 that "the certification body has ownership of the audit report". Therefore, it is necessary to align the GFSI Benchmark Requirement with ISO/IEC 17021-1.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 5	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1	If the scheme owner chooses a management system as the certification system, ISO 22003-1 shall be applied for multi-site sampling. Also, product certification is not included in the scope of IAF MD1. If IAF MD1 is referenced in the GFSI Benchmarking Requirement, it is necessary to specify that "if multi-site sampling is to be conducted in a product certification scheme, the number of samplings shall be specified based on the concept of IAF MD1.	Agree
AB 5	Part II	6.24	Site audit sampling	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.	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 MD1	If the scheme owner chooses a management system as the certification system, ISO 22003-1 shall be applied for multi-site sampling. Also, product certification is not included in the scope of IAF MD1. If IAF MD1 is referenced in the GFSI Benchmarking Requirement, it is necessary to specify that "if multi-site sampling is to be conducted in a product certification scheme, the number of samplings shall be specified based on the concept of IAF MD1.	Opportunity Identified
AB 5	Part II	6.25	Management of non-conformities	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.	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	If the scheme owner chooses a management system as the certification system, ISO 22003-1 shall be applied for multi-site sampling. Also, product certification is not included in the scope of IAF MD1. If IAF MD1 is referenced in the GFSI Benchmarking Requirement, it is necessary to specify that "if multi-site sampling is to be conducted in a product certification scheme, the number of samplings shall be specified based on the concept of IAF MD1.	Opportunity Identified
AB 5	Part II	6.26	Management of non-conformities	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.	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 MD1	If the scheme owner chooses a management system as the certification system, ISO 22003-1 shall be applied for multi-site sampling. Also, product certification is not included in the scope of IAF MD1. If IAF MD1 is referenced in the GFSI Benchmarking Requirement, it is necessary to specify that "if multi-site sampling is to be conducted in a product certification scheme, the number of samplings shall be specified based on the concept of IAF MD1.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	Replace to ISO/IEC 17065 + ISO 22003-2 or ISO/IEC 17021-1 + ISO 22003-1.	Agree
AB 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Hope to discuss the reason of the past decided and group new discussion will be continue-available or not.	Couldn't reach consensus
AB 6	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	Shouldn't the suspension of the current scheme and the application for a new requirements be considered separately?	Couldn't reach consensus
AB 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Ten certifications in each category is too large a requirement. The total number of certifications should be at least 10 and at least one in each category.	Agree
AB 6	Part I	1	Eligibility Criteria	• The Certification Programme is not governed or owned by a public or governmental entity,		Need a description guidance to Government-owned standard(s) programme?	Opportunity Identified
AB 6	Part I	1	Eligibility Criteria	• There is commitment from a minimum of three organisations representing the retail / food service or producing / manufacturing sectors to use the Certification Programme,		Hope to discuss the reason of the past decided will be continual or not.	Opportunity Identified
AB 6	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	Replease ISO 22003 to ISO 22003 series Table A.1 Food Chain Category (same Food Chain Category table)	Couldn't reach consensus
AB 6	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Replace from "days" and "working days" to "calendar days" and "working days".	Couldn't reach consensus
AB 6	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.		Need a description guidance to Government-owned standard(s) programme?	Misunderstood
AB 6	Part II	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 / TS 22003 for management system Certification Bodies.		Replace to ISO/IEC 17065 + ISO 22003-2 or ISO/IEC 17021-1 + ISO 22003-1.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 6	Part II	2.4	Relationship with Accreditation Bodies	The Certification Programme Owner shall establish regular exchanges and communication with their respective Accreditation Bodies. This shall include an agreement with the Accreditation Bodies to ensure accredited Certification Bodies comply with the requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003.		Replace to ISO/IEC 17065 + ISO 22003-2 or ISO/IEC 17021-1 + ISO 22003-1.	Couldn't reach consensus
AB 6	Part II	2.17	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies seeking accreditation for the Certification Programme shall be accredited within 12 months from the date of application to an Accreditation Body.		Hope to discuss the reason of the past decided will be continual or not.	Opportunity Identified
AB 6	Part II	2.18	Accreditation of Certification Bodies	In the event that accreditation is not granted within 12 months, the Certification Programme Owner shall ensure that the Certification Body contract shall be terminated, and potential actions reviewed. In situations where there is a delay, the Certification Body shall provide a plan to the Certification Programme Owner for approval to achieve accreditation.		Hope to discuss the reason of the past decided will be continual or not.	Opportunity Identified
AB 6	Part II	3.1	Relationship with Certification Bodies	The Certification Programme Owner shall have contractual and enforceable arrangements with all Certification Bodies accredited to ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003 to operate their Certification Programme.		Replace to ISO/IEC 17065 + ISO 22003-2 or ISO/IEC 17021-1 + ISO 22003-1.	Couldn't reach consensus
AB 6	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		Replace to ISO/IEC 17065 + ISO 22003-2 or ISO/IEC 17021-1 + ISO 22003-1.	Couldn't reach consensus
AB 6	Part II	5.8	Audit Programme – audit duration	The Certification Programme Owner shall define the expected duration of audits and the rationale for the determination of the duration of the audit; it is expected the duration of an audit to be minimum: - Half a day for scopes AI, AII, BI, BII, BIII, E, FI and FII; - One day for scopes G, I, JI and JII; - Two days for scopes C0, CI, CII, CII, CIV, DI and K; in order to effectively assess an organisation's systems and premises against the Certification Programme's normative documents and provide confidence in the certification process.		Replace Half a day categories to AI, AII, BI, BII, E, FI and FII Replace One da categories to BIII, G, I, JI and JII	Couldn't reach consensus
AB 6	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Multi-site certification part shall fit to 9.1.5 of ISO 22003-1 or 7.4.1.3 of ISO 22003-2. Especialy consider the requirement 9.1.5.3 b) of ISO 22003-1 or 7.4.1.3.4 b) of ISO 22003-2.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 6	Part II	6.1	General requirements	Certification Programmes shall ensure that Certification Bodies meet or exceed the requirements defined in IAF MD1 current version.		(Multi-site certification part shall fit to 9.1.5 of ISO 22003-1 or 7.4.1.3 of ISO 22003-2.)	Couldn't reach consensus
AB 6	Part II	6.21	Site audit sampling	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. 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.	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. 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	shall fit to 9.1.5 of ISO 22003-1 or 7.4.1.3 of ISO 22003-2 Especialy consider the requirement 9.1.5.3 of ISO 22003-1 or 7.4.1.3.4 of ISO 22003-2.	Opportunity Identified
AB 6	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1	shall fit to 9.1.5 of ISO 22003-1 or 7.4.1.3 of ISO 22003-2 Especialy consider the requirement 9.1.5.6 b) of ISO 22003-1 or 7.4.1.3.6 b) of ISO 22003-2.	Opportunity Identified
AB 6	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1	add 9.1.5 of ISO 22003-1 or 7.4.1.3 of ISO 22003-2 from IAF MD 1.	Opportunity Identified
AB 6	Part II	6.24	Site audit sampling	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.	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 MD1	add 9.1.5 of ISO 22003-1 or 7.4.1.3 of ISO 22003-2 from IAF MD 1.	Opportunity Identified
AB 6	Part II	6.25	Management of non-conformities	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.	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	add 9.1.5 of ISO 22003-1 or 7.4.1.3 of ISO 22003-2 from IAF MD 1.	Opportunity Identified
AB 6	Part II	6.26	Management of non-conformities	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.	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 MD1	add 9.1.5 of ISO 22003-1 or 7.4.1.3 of ISO 22003-2 from IAF MD 1.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 6	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	Multi-site certification shall only apply to organisations fit to 9.1.5 of ISO 22003-1 or 7.4.1.3 of ISO 22003-2 Especialy consider the requirement 9.1.5.4 of ISO 22003-1 or 7.4.1.3.5 of ISO 22003-2.	Opportunity Identified
AB 6	Part II	1.21	Data Management	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: •Number of qualified auditors; •Number of valid certificates; •Number of issued certificates within a given period; •Number of suspended certificates; •Number of withdrawn certificates.			Couldn't reach consensus
AB 6	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).			Couldn't reach consensus
AB 6	Part III GAP					Common requirements number, only requirements for category A, or only requirements for category B are so complicated wrote that it would be better to write more clear(e.g. in numbering order?).	Misunderstood
AB 6	Part III GAP	7.2	Personnel training	Agricultural workers who apply agricultural chemicals shall be trained and qualified in the proper application procedures of such chemicals.		add "Hazardous materials such as" before "chemcals"	Couldn't reach consensus
AB 6	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.		Opportunity Identified
AB 7	Part II	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 / TS 22003 for management system Certification Bodies.		Update the use of ISO/TS 22003 in the document to the new version ISO 22003-1.	Couldn't reach consensus
AB 7	Part II	2.8	Relationship with Accreditation Bodies	The Certification Programme Owner shall inform Accreditation Bodies of any relevant information and developments related to the Certification Programme.		The ABs - and if an international scheme evaluation is required - EA/IAF will be informed of the new version before the start of the transition period. To allow the evaluation before accreditation starts.	Opportunity Identified
AB 7	Part II	2.9	Relationship with Accreditation Bodies	The Certification Programme Owner shall agree on their process for the extension of the scope of activities of Certification Bodies with the Accreditation Bodies.		Accreditation Bodies are the one who has the responsability to establish the process for the extension of the accreditation scope of Certification Bodies. However, it is adviseable that the CPO gives a recommendation on the assessment activities needed for an extension of scope	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
AB 7	Part II	2.14	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies shall be publicly available and precisely defined in terms of the exact name of the Certification Programme in scope, its revision number and / or date and its sector of application reference (e.g. industry sector).		Proposal to limit "revision number" only to the major version as a minor version is expected not to entail competence changes and therefore would not require an assessment prior to changing the accreditation scope (but should be evaluated during the first regular surveillance audit)	Opportunity Identified
AB 7	Part II	2.15	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies undertaking audits against a GFSI-recognised Certification Programme have the named Certification Programme and its revision number included in their scope of accreditation.		See above	Misunderstood
AB 7	Part II	2.16	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the accreditation standard used by all Accreditation Bodies for their Certification Programme is consistent and, where appropriate, facilitates a harmonised agreement on behalf of the contracted Certification Bodies.		Unclear requirement.	Opportunity Identified
AB 7	Part II	2.17	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies seeking accreditation for the Certification Programme shall be accredited within 12 months from the date of application to an Accreditation Body.		A CPO has no direct impact on the accreditation process. They can however monitor that the accreditation request was made and contact the AB on the reasons of any possible delay	Agree
AB 7	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		Include the reference to IAF MD 25	Couldn't reach consensus
AB 7	Part II	3.9	Relationship with Certification Bodies	The Certification Programme Owner shall publish guidance / requirements to Certification Bodies on transition arrangements when a new version of the Certification Programme is issued. The Certification Programme Owner guidance / requirements may encompass elements such as the following: - terms and conditions of transition period between previous and new versions; - defined timeline for transition; - comparative information between previous and new versions; - timeline in which Certification Bodies are required to cascade information to all auditors and certified organisations.		Transition periods shall take into account the cascade of processes for all interested parties and allow sufficient time. - evaluation of the new version - preparation of the CB - accreditation to the new version - certification according to the new version	Couldn't reach consensus
AB 8	Part II	2.14	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies shall be publicly available and precisely defined in terms of the exact name of the Certification Programme in scope, its revision number and / or date and its sector of application reference (e.g. industry sector).		The scope shall precise at minimum the major revision number (Second digit shall be optional)	Opportunity Identified
AB 8	Part II	2.15	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies undertaking audits against a GFSI-recognised Certification Programme have the named Certification Programme and its revision number included in their scope of accreditation.		The scope shall precise at minimum the major revision number (Second digit shall be optional)	Opportunity Identified
AB 8	Part II	2.17	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies seeking accreditation for the Certification Programme shall be accredited within 12 months from the date of application to an Accreditation Body.		The 12 Months timeframe from requesting to receiving accreditation is effectively outside the span of control of the CPO. A CPO could however include a provision to allow a temporary recognition until accreditation is obtained and limit that to 12 months at maximum after the application has been reviewed and determined as suitable by AB.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 1	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	(ORGANISATION) recommends that any publicly available information regarding CB performance is presented in a generic format. For example, a rating of 1-5, rather than specific details related to complaints, office assessment findings, etc.	Couldn't reach consensus
CB 1	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	(ORGANISATION) supports the WG proposal to make unannounced audit requirements non applicable to Primary production scopes.	Opportunity Identified
CB 10	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Technical Sub Committee clearly establishing precendence for when this does and does not apply, which I agree with. Can we also agree that this requirement can not be applicable for micro businesses which have less than 10 staff?	Opportunity Identified
CB 10	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	This will damage the brand of GFSI and the CPO when it takes months/over a year to benchmark a new version of the Standard. Would not recommend proceeding with this.	Couldn't reach consensus
CB 10	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	In relation to this point, but is separate in that GFSI does not do well with this currently and that is when a site has a head-office audit (estentially it's a blended audit whereby HO + Site = Final Report). Would have a section separate to multi-site whereby protocols for head-office audits can be established. Examples include non-conformities raised during the head-office are counted at each site audit etc. Create a section 7 for this.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 2	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	Grandfather principle! Approved auditors don't have to fulfill new requirements Remote-criteria only there where it is needed!	Opportunity Identified
CB 2	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Grandfather principle! Approved auditors don't have to fulfill new requirements	Opportunity Identified
CB 2	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	"at least three on-site audits" is enough to maintain auditor skills and competence	Opportunity Identified
CB 3	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	The 9 month time frame is difficult for the CPO's and certified sites to implement in. Suggest the current 12 months to reapply against new benchmarking requirement for effective change managment.	Opportunity Identified
CB 3	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree. Unannounced audits in primary production are difficult to scheule due to weather, crop harvest time changes etc. Also no appreciable difference in audit evaluations of announced vs unannounced. Suggest unannounced for post farm site be required only when risk to the certificate or CPO brand is evident either due to evaluation or recall/withdrawl. Unannounced could still be considered a choice for organizations that wish to and up to the CPO to define how this would conducted by the CB's.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 3	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	A risk assessment on chemicals is redundant since 14.2 7 & 14.3 requirements ensure they are approved and used according to label and regulatory requirements.	Couldn't reach consensus
CB 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	Should be specific to which Part of ISO 17021 and what is the certification type of ISO 17065. Should include reference to ISO 22003:2022 Parts I and II as well.	Couldn't reach consensus
CB 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Agree with 2 CB's to ensure independence of contracts.	Agree
CB 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Recommend to elaborate on, 'significant changes'. Agree with WG suggested text, also consider any location based sanctions.	Opportunity Identified
CB 4	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Suggest to replace "for a minimum of 12 months" WITH "for sufficient time to allow the CPO to evidence the minimum 10 valid accredited certificates".	Opportunity Identified
CB 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Suggest to replace "for each GFSI scope of recognition" WITH "regardless the # of GFSI scopes of recognition ". Suggest to exclude "during a 12-month period prior to the date of the application". The minimum period of operation should be the time each CPO need to operate the 10 certificates and not 12 months of operation . This "sufficient period" will depend on each CPO performance.	Opportunity Identified
CB 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner does not have any practises deemed as restricting access to markets,		Recommend to give examples of restrictive practices	Opportunity Identified
CB 4	Part I	4	Methodology	GFSI Technical Manager	GFSI Senior Technical Manager or assigned by the GFSI Senior Technical Manager	Agree with WG member comments	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 4	Part II	1.3	Ownership	The Certification Programme Owner shall neither have conformity assessment nor certification activities for the Certification Programme. In particular, the Certification Programme shall not be developed, managed or owned by a Certification Body or group of Certification Bodies.		There may be cases where a certification body is part of a structure which provides adequate separation to become a CPO.	Misunderstood
CB 4	Part II	1.15	Certification Programme Development and Maintenance	The Certification Programme's normative documents shall be reviewed and re-issued as appropriate to remain current and address stakeholders' expectations. This shall include revision in accordance with the issuing of new versions and sub-versions of the GFSI Benchmarking Requirements.		Suggest adding the following wording: "Sufficient notice shall be given to stakeholders of changes in normative documents and of the expected implementation dates for any changes / updates to be made."	Couldn't reach consensus
CB 4	Part II	1.22	Data Management	The Certification Programme Owner shall have a process in place to verify the authenticity of the certificate.		Suggest amended wording: to verify the authenticity of certificates issued, amended, suspended or withdrawn"	Couldn't reach consensus
CB 4	Part II	3.10	Integrity Programme	The Certification Programme Owner shall implement a risk-based programme to monitor and regularly review the performance of Certification Bodies, and their compliance to the Certification Programme's requirements. This programme shall consider the number, size and complexity of audits carried out by the Certification Bodies.		Suggest to refer to "Risk-based Integrity Programme" There should be a minimum set of criteria provided by the GFSI to CPO's for CB Integrity performance monitoring.	Couldn't reach consensus
CB 4	Part II	3.11	Integrity Programme	The Certification Programme Owner shall ensure that results of the integrity programme are communicated to and reviewed with the Certification Bodies at least once a year.		A formal method of communication to be established, including allowing a period of review of the results for data-integrity and correctness, prior to publication on public platforms.	Couldn't reach consensus
CB 4	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	The Key performance Indicators, methodology of evaluation, validity periods for data evaluated and frequency for monitoring intervals should be clearly defined, documented and communicated between CPO and CB's. The monitoring criteria should be evaluated periodically for appropriateness by the CPO.	Couldn't reach consensus
CB 4	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		Suggested rewording: "The CPO shall ensure that Certification Bodies manage the competence of all management, administrative, technical and auditing personnel involved in respective Certification Programmes, in line with CPO and GFSI Benchmarking requirements"	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 4	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	Disagree with WG comments that on-site requalification witness assessments should include at least 1 MD on-site by the witness assessor. The purpose of the Witness assessment is to evaluate maintenance of continued auditor competence and suitability, not any site-specific conditions. The use of ICT in subsequent requalification witness assessments enables timeous requalifications within allowed timelines using qualified, experienced witness assessors, whilst limiting the cost of certification. Changing this requirement will inevitably lead to overdue re-qualificiations due to logistical cahllenges, or use of local, less experienced witness assessors. It also counters CB's sustainability efforts to limit carbon miles, especially for multi-national CB's.	Opportunity Identified
CB 4	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	Agreee with WG comments	Opportunity Identified
CB 4	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Agree that any GFSI-recognized scheme audits should fulfil this requirement. Auditor & certified client distribution globally does not always allow for 5 audits per CPO owned scheme. Internal annual CB or CPO Update training and calibrations can fulfill the scheme specific CPD.	Couldn't reach consensus
CB 4	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	If Unannounced audits for Scopes A - B are maintained, then suggest to standardize this to 1 audit in every 4 years for each certified organization and to remove the 10% per year as it ensures all certified organizations are sampled consistently and prevents certified organizations changing CB's to avoid being part of 10% sample. More consistent to apply - in line with other categories but at a reduced frequency.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 4	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.	Disagree with the term "financial or other risk categories" - Suggest: "High risk related to food safety or authenticity". These high -risk crops, commodities or activities should be eligible for multi-site or group certification, but no sampling shall be allowed, with all sites being audited annually. Current requirement probibits multisite certification completely which is impractical.	Couldn't reach consensus
CB 4	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.		Couldn't reach consensus
CB 4	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.		Opportunity Identified
CB 4	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	Disagree with WG - accepted term is cross-contamination	Couldn't reach consensus
CB 4	Part III FSMS	16.2	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.	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.	Disagree with WG - accepted term is cross-contamination	Couldn't reach consensus
CB 4	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Agree with WG comments	Agree
CB 4	Part III FSMS	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.	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 - add intended consumption as well?	The WG suggested addition is not practical to apply in terms of traceability, as manufacturers maintain traceability of product intended for export up to a certain point of sale in country of destination, if product is sold further for consumption in different countries, that will fall on the next supply chain partner to trace again to point of sale.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 4	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	Agree with WG comments	Agree
CB 4	Part III GAP	1	Land used for production	Land used for production shall be evaluated for hazards and contamination. Control measures shall be implemented to reduce hazards to acceptable levels.		Suggest more detailed description of hazards and contamination	Couldn't reach consensus
CB 4	Part III GAP	3.1	Location, design and layout	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning, disinfection and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Disagree with inclusion of "Disinfection" as suggested by WG. Not all structures will require disinfection. Consider rewording to state "…to facilitate suitable hygiene practices including appropriate cleaning and pest control programs to prevent cross contamination relevant to the operations"	Couldn't reach consensus
CB 4	Part III GAP	3.2	Location, design and layout	All buildings shall be marked to indicate that they contain livestock and that no entry to unauthorised persons is permitted.		Suggest rewording to clearly define the sub-sector of related agriculture: "All buildings & structures used to house livestock shall be clearly marked to prohibit unauthorised entry" Suggest to provide a clear distinguish between biosecurity measures relevant to farming with animals / aquaculture / crops, as there are definitive controls that are not relevant across all the agricultural sector, such as this requirement.	Couldn't reach consensus
CB 4	Part III GAP	3.3	Location, design and layout	The site facility shall be fenced and the entry points controlled by lockable gates.		Agricultural production area can be huge and to be completely fenced and access controlled, adds huge cost.	Couldn't reach consensus
CB 4	Part III GAP	3.4	Location, design and layout	Entry and exit points to the site shall be equipped for cleaning and disinfecting of vehicle wheels.		Only relevant to biosecurity measures for livestock farming, not relevant to crop farming. For crop farming entry and exit points to enclosed production sites (greenhouses) may be controlled with foot / boot dip stations or disinfection of tractor tyres, where related risk of cross contamination is determined on the risk assessment. But not in all cases.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 4	Part III GAP	3.5	Location, design and layout	Entry annex points of the buildings structures shall be equipped with cleaning materials and footwear disinfectant.			Couldn't reach consensus
CB 4	Part III 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 and silo seepage.		Add "residual agricultural chemicals" to potential contaminants.	Agree
CB 4	Part III GAP	3.8.2	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.			Couldn't reach consensus
CB 4	Part III GAP	4.1.2	Prevention of cross-contamination	Effective measures shall be taken during production, storage and transport to prevent cross-contamination of produce from agricultural inputs, cleaning agents, veterinary medicines or personnel who come directly or indirectly into contact with other sites, animals or produce.			Couldn't reach consensus
CB 4	Part III GAP	4.3	Prevention of cross-contamination	Feed shall be stored securely and handled separately from waste liquids, untreated manure, hazardous substances, veterinary medication and cleaning chemicals.		Suggest rewording: " Feed shall be stored securely and handled to prevent potential cross contamination from hazardous substances, such as waste, untreated manure, veterinary medications, cleaning chemicals and lubricants."	Opportunity Identified
CB 4	Part III GAP	7.2	Personnel training	Agricultural workers who apply agricultural chemicals shall be trained and qualified in the proper application procedures of such chemicals.		Persons who handle / apply agricultural chemicals shall be suitably trained and qualified in the safe handling and correct use of agricultural chemicals and related eqiupment. This shall be done by a competent authority.	Couldn't reach consensus
CB 4	Part III GAP	11.3	Water quality	Based on risk assessment, measures shall be in place to protect sources of agricultural waters from potential contamination, including corrective actions to minimise the risk of contamination (e.g., from livestock, sewage treatment, human habitation)		Add "residual agricultural chemicals" to potential contaminants.	Agree
CB 4	Part III GAP	14.3	Input - Agricultural chemicals	Only agricultural chemicals which are authorised for the cultivation of the specific produce / grains and pulses shall be used. They shall be used according to the manufacturer's instructions, local legislations and for the intended purpose.		Suggest to add another clause requiring the accuracy of applications through use of calibrated or verified application / dosing equipment for all agricultural chemicals applied (veterinary medicines and pesticides)	Couldn't reach consensus
CB 4	Part III 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.		A procedure shall be established, implemented and maintained for the safe collection, storage and disposal of waste material, including waste water and drainage in a manner that does not pose a risk to the product or production environment.	Agree
CB 4	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Suggest to specify facility and grounds as definition of 'site'	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 4	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.		Opportunity Identified
CB 4	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.		Opportunity Identified
CB 4	Part III HACCP	1.6	Hygienic design process	The hygienic design and suitability of buildings and equipment shall be evaluated throughout their life cycle from the design concept, through construction, purchasing and during use, until the end of their intended life.	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.	Suggest to include the stage of commissioning as well: "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, commisioning and during use, until the end of their intended life. "	Couldn't reach consensus
CB 5	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	(ORGANISATION) disagrees with public sharing of these confidential informations. These KPI should be shared between CPO and CB only and be monitored by the CPO in the event of an unsatisfactory result in order to make it compliant with the expectations of the certified or to be certified sites.	Couldn't reach consensus
CB 6	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. 1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples. 2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.	The present activities to manage any serious situation is on full charge of CB as extra activities in terms of costs and times. These effort are consideably impacting on CB management for each single standard issued by CPO	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 6	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		There is not a common definition for food-related or bioscience disciplines as well as a clear definition of the boundaries of the term “or equivalent”, therefore the consolidated approach is to consider and apply the international rules and guidance available by balancing the education as one of the competence evaluation elements. The evolution of the course of studies along the recent years made available “food related disciplines” not present in the past as well as STEM disciplines that are widely recognized nowadays. Therefore, looking at the today qualified professionals with years of experience and an education path completed decades ago, we need to consider the term “or equivalent” with a wise approach.	Opportunity Identified
CB 7	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Suggest CPOs be given 12 months to reapply against new benchmarking requirements since 9 months does not allow sufficient time to implement and communicate changes.	Opportunity Identified
CB 7	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system’s development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		This requirement is a duplicata of an accreditation requirement that the CB already have to comply with.	Couldn’t reach consensus
CB 7	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		"Upon request" would be a more realistic term than "at all times".	Couldn’t reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 7	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		"Product recalls" should not be listed as a KPI to measure CB performance	Opportunity Identified
CB 7	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	We do not support publication of CB KPI results. This information is confidential and should be share only with the CPO and GFSI upon request.	Couldn't reach consensus
CB 7	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		Those requirements are assessed during the certification body assessement made by the accreditation body.	Couldn't reach consensus
CB 7	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		Those requirements are assessed during the certification body assessement made by the accreditation body.	Couldn't reach consensus
CB 7	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	It's very hard to find auditors in primary production who have 2 years full time in a food safety role. This requirement means that the auditors that we can qualify in primary production have more of a profile of quality manager in food processing. They lack knowledge in primary production and this causes frustrations among producers who consider that the auditors lack knowledge in their food sector categories.	Opportunity Identified
CB 7	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Auditors who are already qualified should not have to go through a qualification process again. Only new auditors should comply with the new/current requirements.	Opportunity Identified
CB 7	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	We cannot expect to auditors to be able to apply relavant laws and regulations in an unlimited number of export markets.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 7	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Agree.	Couldn't reach consensus
CB 7	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	We agree that this modification for primary production scopes (BI and BIII) must be done.	Opportunity Identified
CB 7	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	The information is already required to be on the certificate.	Couldn't reach consensus
CB 7	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	This requirement should not apply to primary production/scopes.	Agree
CB 8	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	We agree with WG comment that this is vague language and suggest: • The Certification Programme Owner is not undergoing any significant changes impacting their ability to operate.	Agree
CB 8	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	Misunderstood
CB 8	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	We agree with WG comments on 12 months and the continuation approach of CPO status.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 8	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.		Opportunity Identified
CB 8	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	*We agree with the WG Member comments that the Appeals Committee should be independent of the GFSI Director and Steering Committee but not include competitors to CPOs or CBs.*	Agree
CB 8	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.			Opportunity Identified
CB 8	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.		Suggest to remove "All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011."	Agree
CB 8	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		The Certification Programme Owner shall ensure ~~that a designated~~ the Certification Body ~~employee~~ is responsible for the quality system's development, implementation and maintenance. ~~This designated employee~~ The Certification Body shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 8	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any life-threatening food safety situations such as food safety recalls or foodborne outbreaks.~~, or food safety media attention which could result in bringing the integrity of Certification Programme Owner or GFSI into disrepute, and notify GFSI of such situation.~~ [Note: Recommend to delete any reference to "integrity" or disrepute from the benchmarking requirements.	Opportunity Identified
CB 8	Part II	3.12	Desktop Assessment	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance on audit and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing ~~relevant~~ certification audit reports and auditor records.	Couldn't reach consensus
CB 8	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 8	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	We would encourage GFSI to consider risk based frequency for witness assessments based on competence and allow remote witness audits. Please note that for auditors conducting multiple CPO audits, they could require a witness audit every year. A risk based frequency of every 3-5 years is more reasonable and manageable financially.	Opportunity Identified
CB 8	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4.	Opportunity Identified
CB 8	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	We disagree with the WG Comment to add "respective of a given certification programme." At some point GFSI should allow for recognition between CPOs as the auditor qualifications are very similar. With the use of contract auditors, the requirement of 3 audits for each CB that uses the same auditor is repetitive.	Opportunity Identified
CB 8	Part II	4.10.2	Initial Auditor Qualification	The Certification Programme Owner shall ensure that the witness audit(s) carried out as part of the certification body's initial auditor qualification follows the standard audit plan agreed with the certified organisation, including the use of ICT if applicable, as long as this does not compromise the effectiveness of the assessment. The Certification Programme Owner shall ensure that the witness assessor is present on site for parts of the audit carried out on site.	Suggest to introduce a distinction for 1st approval where the entire witness audit should be conducted on site (no permitted use of ICT).	[Note: We disagree with the WG Member comments on ICT for the initial with audit especially in remote countries that may be cost prohibitive to travel.]	Opportunity Identified
CB 8	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	[Note: We recommend that GFSI specify that auditor scope training is the responsibility of the CBs to conduct internally.] The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 8	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the countries of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Couldn't reach consensus
CB 8	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	We agree with this provision to allow 5 audits in any GFSI-recognised CPO.	Couldn't reach consensus
CB 8	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	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 of significant food safety issues within a certified organisation based on regulatory inspections or recalls. [Note: Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.]	Couldn't reach consensus
CB 8	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Note: Unannounced audits do not work for the horticulture industry. Often times the windows for crop harvest and packing is quite small and the auditor has to travel great distances. Auditors have turned up at a site only to find production not happening. The unannounced criteria needs to be removed for primary production.	Opportunity Identified
CB 8	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 8	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a reasonable timescale defined with the Certification Programme Owner, before certification can be awarded.	Couldn't reach consensus
CB 8	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	We agree with the WG comments on the need to define incidents to be reported and recommend the definition be any recalled product.	Opportunity Identified
CB 8	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*		Couldn't reach consensus
CB 8	Part II	6.21	Site audit sampling	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. 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.	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. 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		Agree
CB 8	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1		Opportunity Identified
CB 8	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1		Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 8	Part II	6.24	Site audit sampling	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.	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 MD1		Opportunity Identified
CB 8	Part II	6.25	Management of non-conformities	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.	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		Opportunity Identified
CB 8	Part II	6.26	Management of non-conformities	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.	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 MD1		Opportunity Identified
CB 8	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on critical food safety ~~related~~ activities.	Opportunity Identified
CB 8	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Specified requirements or specifications shall be established, implemented and maintained for all inputs to the process, including services that are purchased or provided ~~and~~ which have an effect on food safety.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 8	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	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~~ documented.	Couldn't reach consensus
CB 8	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen containing ingredients, cross contamination, ~~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, and implementation of controls to reduce or eliminate allergen risks.	Couldn't reach consensus
CB 8	Part III FSMS	16.2	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.	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.	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.	Opportunity Identified
CB 8	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	We agree that a clause for allergen management plan validation should be added. We suggest GFSI include allergen test method expectations such as recommending allergen specific methods vs. ATP or non-specific protein swabs which do not measure the allergen risk.	Couldn't reach consensus
CB 8	Part III FSMS	26	Change Management	Change control shall be undertaken and documented to evaluate the impacts of any changes/ modifications on equipment/building hygienic design.	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.	Change control shall be undertaken and documented to evaluate the impacts of any changes/ modifications on equipment/building hygienic design. Change control shall include planned and unplanned equipment changes including temporary or emergency fixes.	Couldn't reach consensus
CB 8	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.	Personnel hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CB 8	Part III 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 should be recorded and verified.	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 be recorded and verified.	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 and sanitizing activities should be recorded and verified.	Couldn't reach consensus
CB 8	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	Water used as an ingredient, reused, and for sanitation shall meet CODEX Guidelines for the Safe Use and Reuse of Water in Food Production and Processing.	Opportunity Identified
CB 8	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Opportunity Identified
CB 8	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.		Opportunity Identified
CB 8	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.		Opportunity Identified
CB 9	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*		Opportunity Identified
CB 9	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.			Opportunity Identified
CB 9	Part III FSMS	3	Management review	The senior management shall review all elements of the Food Safety Management System, including 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.			Opportunity Identified
CB 9	Part III GMP	7	Training	Procedure shall be established, implemented and maintained to ensure that all employees are trained, and retrained as necessary to have an understanding in food safety, commensurate with their activity.		Sugestión. Add training on positive behaviors related to personnel activities.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CBA 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme. • El Titular del Programa de Certificación tiene un acuerdo con uno o más Organismos de Acreditación para que los Organismos de Certificación operen de acuerdo con la norma ISO/IEC 17065 o ISO/IEC 17021 para el alcance de su Certificación o ISO/IEC 17021 para el alcance de su Programa de Certificación.	Are there any additional references to be included? ¿Hay alguna referencia adicional que deba incluirse?	Some of the Accreditation bodies that the organization has must have IAF recognition.	Misunderstood
CBA 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme, • El Titular del Programa de Certificación tiene relaciones contractuales con al menos dos Organismos de Certificación que tienen acreditación para el alcance de su Programa de Certificación,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.* *Debate en el grupo sobre la posibilidad de utilizar un solo organismo de certificación como umbral. Sin embargo, esto plantea el riesgo de monopolio si solo un organismo de certificación ofrece el programa.*	We consider that the Certification Programme Owner should maintain the provision to have at least two Certification Bodies.	Agree
CBA 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes, • El propietario del programa de certificación no está experimentando cambios significativos.	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	It is suggested to add a note that relates the significant changes that are considered relevant.	Agree
CBA 1	Part I	3	Application Options Opciones de aplicación	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn. "Comparación completa • No haber sido sometido previamente a una evaluación comparativa por parte de GFSI, • Haber sido evaluado anteriormente, pero la solicitud fue retirada sin completar el proceso de evaluación comparativa (nueva presentación), • Haber sido sometido con éxito a una evaluación comparativa con una versión anterior de los Requisitos de evaluación comparativa de GFSI (nueva evaluación comparativa), • Haber sido reconocido anteriormente por GFSI, pero se le retiró el reconocimiento."	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories. El grupo de trabajo sugiere mantener los alcances de GFSI tal como están, sin cambios con respecto a las categorías de la cadena alimentaria ISO 22003.	Make use of the food categories in the current version of ISO 22003, as it aligns with the accreditation standards.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CBA 1	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Consistent corrective actions based on cause analysis based on risk analysis must be considered to identify the causes that generated the deviation and thus prevent its recurrence.	Misunderstood
CBA 1	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Consideration could be given to involving certification programme owners, certification bodies and accreditors in the panel in order to maintain impartiality of decisions.	Agree
CBA 1	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Define notification times and contacts, as well as the expected actions to be executed in the different events that may occur in the defined events. To ensure that it is delivered in a timely manner and with the required information..	Opportunity Identified
CBA 1	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Specify that X years of experience is in the food category (subcategory).	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CBA 1	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Consider maintaining experience in quality control and/or food safety. Also consider experience in production processes.	Opportunity Identified
CBA 1	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Define the application of additional audits according to the degree of non-compliance or when serious events are reported that impact food safety or put reputation at risk, so that there is unification of criteria.	Couldn't reach consensus
CBA 1	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Suggested wording: - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one unannounced audit per certification cycle.	Opportunity Identified
CBA 1	Part II	5.30	Management of Certification	The Certification Programme Owner shall ensure that Certification Bodies notify them of any withdrawal or suspension of certification of an organisation.		Refer to the incident reporting times.	Couldn't reach consensus
CBA 1	Part II	6.1	General requirements	Certification Programmes shall ensure that Certification Bodies meet or exceed the requirements defined in IAF MD1 current version.		Please note that what is defined in ISO 22003-1 also applies.	Couldn't reach consensus
CBA 1	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	Since this is a multi-site project, it would be appropriate to define the sites to be verified in the event of granting for Stage 1 (minimum % of sites) and Stage 2 (all sites).	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CBA 1	Part II	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 and independent from the sites.	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 ~~and independent~~ from the sites.	It may be presented that the central function is located on one of the floors, although its guidelines are specific to all sites	Couldn't reach consensus
CBA 1	Part III FSMS	1.2	Management responsibility	A clear organisational structure identifying the job functions and responsibilities of at least those employees whose activities affect Hygienic Design shall be established, implemented and maintained.		The word "role" could be added to "A clear organizational structure that identifies roles, functions and responsibilities shall be established, implemented and maintained..."	Opportunity Identified
CBA 1	Part III FSMS	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.	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 - add intended consumption as well?	As there may be products that are not labeled, it would be appropriate to include additional technical information provided to the customer when applicable, such as product data sheets.	Couldn't reach consensus
CBA 1	Part III FSMS	26	Change Management	Change control shall be undertaken and documented to evaluate the impacts of any changes/ modifications on equipment/building hygienic design.	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.	It is suggested to consider change control based on the PDCA cycle to ensure that changes are carried out in a planned manner and that actions can be taken in a timely manner.	Couldn't reach consensus
CBA 1	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	Specify types of changes such as: infrastructure, equipment, process, product, personnel, among others in order to provide greater guidance.	Couldn't reach consensus
CBA 1	Part III GMP	2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the production of safe products.		It would be pertinent to specify within the maintenance some types of land such as internal spaces, access roads, the maneuvering yard and the surroundings of the organization.	Couldn't reach consensus
CBA 1	Part III GMP	4.2	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to maintain product integrity and regulatory compliance regarding the disposal, resale, donation, restocking or reuse of product being salvaged or reclaimed.		Consider the control that should be carried out on segregated trademarked material that is donated to avoid inappropriate use.	Couldn't reach consensus
CBA 1	Part III GMP	5	Employee facilities	Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.		It would be appropriate to include language indicating that these services must have a supply of services such as drinking water for hand hygiene activities.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CBA 1	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	The hazard analysis based on the methodology described in the ISO 22000 standard could be included since, for example, FSSC 22000 does not follow the Codex methodology and the two methodologies are not equivalent, for example, the Codex does not speak of PPRO while ISO 22000 does.	Opportunity Identified
CBA 1	Part III HACCP	1.2	Hazard and Risk management system	The scope of the Hazard and Risk Management System shall be defined per product / product category and / or per process or production step.		The type of storage of the product obtained should be considered to ensure correct food category classification.	Opportunity Identified
CBA 1	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	It is also suggested to review the hazard analysis when events that affect safety occur in order to consider all possible situations that warrant carrying out this activity..	Opportunity Identified
CBA 1	Part III HACCP	1.17	Hygienic design mitigation	Appropriate measures (with frequencies) shall be specified, undertaken accordingly and documented to mitigate any remaining food safety risks identified in the hygienic design risk assessment following building/equipment construction, purchase and installation.		"Residual food safety risk identified after changes/modifications to the hygienic design of the building and equipment" could be considered.	Couldn't reach consensus
CBA 1	Part IV Glossary	Glossary	Agent	An organisation or individual that does not own but trades any type of food, feed and/ or packaging. Such activities exclude production, storage and any physical handling of the product; they can be performed under specific customer requirements or not. Organización o individuo que no posee, pero comercializa, cualquier tipo de alimento, pienso y/o envase. Dichas actividades excluyen la producción, el almacenamiento y cualquier manipulación física del producto; pueden realizarse según los requisitos específicos del cliente o no.		Include a definition of the word marketing. It is important to define marketing, either as the activity where product promotion and sales strategies are generated, or as distribution strategies. In the case you refer to, the client's requirements should be considered in order to provide relevant information regarding safety conditions that impact the final consumer.	Couldn't reach consensus
CBA 1	Part IV Glossary	Glossary	Approved supplier	A supplier that has been evaluated to demonstrate conformance to specific requirements by the audited site. See also "Supplier" definition. Proveedor que ha sido evaluado para demostrar su conformidad con requisitos específicos por parte del sitio auditado. Véase también la definición de "Proveedor".		Clarify the reference to "by the audited site" considering that the requirements are parts of the specifications defined by the client.	Couldn't reach consensus
CBA 1	Part IV Glossary	Glossary	Broker corredor, agente de bolsa, agente comercial	See "Agent". Ver "Agente".		It is suggested to specify the type of broker.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CBA 1	Part IV Glossary	Glossary	Certification	A process by which accredited Certification Bodies, based on an audit, provide written assurance that food safety requirements and management systems and their implementation conform to requirements. Proceso mediante el cual los organismos de certificación acreditados, basándose en una auditoría, proporcionan una garantía escrita de que los requisitos y sistemas de gestión de la seguridad alimentaria y su implementación se ajustan a los requisitos.	ISO/IEC 17000	Consider what is defined in the ISO/IEC 17000 standard regarding the term certification in order to have a definition aligned with the provisions of ISO.	Opportunity Identified
CBA 1	Part IV Glossary	Glossary	Competence	Ability to apply knowledge and skills to achieve intended results. Capacidad de aplicar conocimientos y habilidades para lograr los resultados previstos.	ISO/ IEC 19011 ISO/ IEC 9000	Consider the words referred to in ISO/IEC 9000 of education and experience within the term competence to give greater precision.	Opportunity Identified
CBA 1	Part IV Glossary	Glossary	Cross contact	Allergen cross-contact occurs when an allergenic food, or ingredient, is unintentionally incorporated into another food that is not intended to contain that allergenic food. El contacto cruzado con alérgenos se produce cuando un alimento o ingrediente alergénico se incorpora de forma no intencionada a otro alimento que no está destinado a contener ese alimento alergénico.	CXC 80-2020	Maintain the full title "cross-contact with an allergen", considering that there is also cross-contact due to microbiological contamination.	Opportunity Identified
CBA 1	Part IV Glossary	Glossary	Emergency	Situation in which the company deviates from standard operating procedures under defined conditions. Situación en la que la empresa se desvía de los procedimientos operativos estándar en condiciones definidas.		It is important to consider that emergencies also arise due to adverse events not described in a procedure, such as food fraud, food defense, natural events, or public health diseases.	Couldn't reach consensus
CBA 1	Part IV Glossary	Glossary	Environmental monitoring programme	Evaluation of the effectiveness of controls on preventing contamination from the site environment. Evaluación de la eficacia de los controles para prevenir la contaminación del entorno de la planta.		Considering that there must be a trend analysis, the definition can be completed as:"Evaluation and analysis of the effectiveness of controls on preventing contamination from the site environment."	Couldn't reach consensus
CBA 1	Part IV Glossary	Glossary	Food	Substance (ingredient), whether processed, semi-processed or raw, which is intended for consumption, and includes drink, chewing gum and any substance which has been used in the manufacture, preparation or treatment of "food" but does not include cosmetics or tobacco or substances (ingredients) used only as drugs. Umbrella term for any product in the GFSI scope, i.e. packaging, feed, etc. "Sustancia (ingrediente), ya sea procesada, semiprocesada o cruda, que se destina al consumo, e incluye bebidas, chicles y cualquier sustancia que se haya utilizado en la fabricación, preparación o tratamiento de "alimentos", pero no incluye cosméticos ni tabaco ni sustancias (ingredientes) utilizadas únicamente como medicamentos. Término general para cualquier producto en el ámbito de aplicación de la GFSI, es decir, envases, piensos, etc."	ISO / IEC 22000 CAC / GL 81 2013	You might consider specifying ingredients of animal or plant origin.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	This should not be part of eligibility criteria - this is included in the CPO change management process Examples are perceived as the requirement. Recommend to delete examples since the examples provided may or may not impact the quality of the delivery of the GFSI recognized certification program and could be interpreted as absolutes.	Opportunity Identified
CPO 1	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Agree with WG comments - the process for new and existing CPOs shall not be the same. Remove 12 months operation for existing benchmarked CPOs; for new versions of a currently recognised programme, only need to prove that new version of the Scheme complies	Opportunity Identified
CPO 1	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	Do not agree with WG comments -an ongoing investigation is not grounds to put benchmarking on hold.	Couldn't reach consensus
CPO 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Agree with WG comments - the process for new and existing CPOs shall not be the same. Remove 12 months operation for existing benchmarked CPOs For currently recognised programmes, when issuing new versions of an already benchmarked Scheme, only need to prove that new version of the Scheme complies with the current benchmarking requirements through a document assessment, implementation to be verified during the regular MCAs and workplan to facilitate continuous benchmarking	Opportunity Identified
CPO 1	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	Agree with WG comments - current scopes align with ISO 22003 The full application process should not apply to existing recognized CPOs -a re-benchmarking process should be in place, based on a GAP assessment and be defined under continued recognition	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		Suggest changing the eligibility criteria for recognized programs so that GFSI can perform a continued recognition assessment of an existing GFSI recognized programs (in good standing) to the new requirements prior to implementation. These continued recognition assessments should cover both part II and part III with the goal of making the audit transition for participating facilities much more fluid. If this could occur the recognized CPOs would be able to implement the required changes, the CBs would be able to update thier accrediation to the new program version, and the facilities would not need to go through duplicative audits because the initial audits would be benchmarked recognized to the updated version of the program. Facilities do not want to go through an audit that isn't to a GFSI benchmarked program because it won't have the same recognition, and is not in the interest of the industry stakeholders	Opportunity Identified
CPO 1	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.	The full application process should not apply to existing recognized CPOs -a re-benchmarking process should be in place, based on a GAP assessment and be defined under continued recognition; and no need to demonstrate market demand by submitting 10 certificates per Food chain category	Opportunity Identified
CPO 1	Part I	4	Methodology	Benchmark Leader	GFSI Benchmark Leader	Conflict of interest requirements to be defined and be at least 2 years aligned with current ISO principles	Couldn’t reach consensus
CPO 1	Part I	4	Methodology	GFSI Executive Director	GFSI Director	They may reassign the Benchmark Leader at any time, if properly justified and deemed necessary to do so, with sufficient notification to the CPO. The current workplan of the CPO shall not be negatively impacted as a result	Couldn’t reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Suggest change to 12 months to allow for effective change management and implementation at site level	Opportunity Identified
CPO 1	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Preventative actions is not appropriate at CPO level; keep current wording as is: Corrective action planning	Agree
CPO 1	Part I	5	Key procedural steps	A => Application		in the year prior to publication of a new version of the GFSI benchmarking requirements, no new application will be accepted. A notice will be displayed on the GFSI website to indicate the starting date of this one-year period, and existing GFSI recognized CPOs will be informed in writing/via email	Opportunity Identified
CPO 1	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Board decision and communicating to the CPO, e.g. 2 weeks.	Couldn't reach consensus
CPO 1	Part I	5	Key procedural steps	B => Desktop Review/Self assessment			Opportunity Identified
CPO 1	Part I	5	Key procedural steps	E => Stakeholder consultation			Misunderstood
CPO 1	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Submitting appeals to the GFSI Executive Director in the case of appealing a decision by the GFSI Executive Director is not impartial. An alternative option shall be available in this case.	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Need to have an independent appeals committee that has good understanding of the Benchmarking requirements and representative of the scope	Agree
CPO 1	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		Sanction process should be transparent including the escalation process including what would initiate a sanction and the timelines involved. A definition is needed for non-alignment as its not in current glossary;	Opportunity Identified
CPO 1	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time for stakeholder communication plan, prior to the suspension being published on the GFSI website	Opportunity Identified
CPO 1	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		The CPO shall be informed in writing in the case of withdrawal, prior to the withdrawal being published on the GFSI website	Opportunity Identified
CPO 1	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	It is unclear how this WG comment applies in the context of continued recognition	Opportunity Identified
CPO 1	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.		"It is not possible to comment on WG Member comments and proposals, so a second public consultation would be required once the final document is available to ensure a transparent process; Ownership definition needs to be aligned with Part 1"	Couldn't reach consensus
CPO 1	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.		NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011: it is not possible for a CPO to demonstrate this level of conformance. Remove this last part of the element	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		"GFSI should add clarity around this requirement. Making it available to CB personnel and auditors should be enough to satisfy the clause, and depending on whether the technology is being used or not.	Couldn't reach consensus
CPO 1	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		Duplication of accreditation requirements - suggest to remove to ensure efficiency	Couldn't reach consensus
CPO 1	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Remove: "at all times" or reword to "in a timely manner"	Couldn't reach consensus
CPO 1	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Do not agree with WG examples added, GFSI have to define what incidents are considered to bring GFSI into disrepute, and define the incident procedure, including timelines for communications	Opportunity Identified
CPO 1	Part II	3.12	Desktop Assessment	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance on audit and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records.	Leave requirement as is	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		Remove product recalls from the list of risk factors as recalls by a CO is not a metric linked to the performance of a CB	Opportunity Identified
CPO 1	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	WG comment is unclear as it seems to relate to monitoring of the CPO, that does not align with 3.14. Don't agree with comment of adding it to the GFSI website or CPO public pages. KPIs are intented to drive or reinforce good performance to CPO's programs and are intended to be used to optimized the program, drive collaboration and open communication with CBs. Since KPIs are very much driven by the CPO they are likely unique to each program with different criteria and will like drive confusion if published.; Change current requirement as follows: The Certification Programme Owner shall define and have a dedicated propgram to monitor Key Performance Indicators for Certification Bodies. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	Couldn't reach consensus
CPO 1	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		Duplication of accreditation requirements - suggest to remove to ensure efficiency	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	Remove examples and leave only the first part of the element content up to: as specified by the CPO, and include that auditor performance includes the evaluation of soft skills.	Opportunity Identified
CPO 1	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	Do not agree with with WG comments - leave requirement as is	Opportunity Identified
CPO 1	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree with WG comments	Opportunity Identified
CPO 1	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Cannot include reference to GFSI auditor training and professional development framework as it has not been approved/completed. It is therefore not possible to determine whether this is suitable to include in the requirement in this public consultation	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		"Auditors that were qualified a long time ago, are being questioned and the level of competence of the auditors. Need to allow for grandfathering of existing auditors and have requirements linked to the benchmarking standard at the time. Make requirements to apply for new applicants. Remove the education requirement (to have a degree)- Table 1 as having a degree does not make a good auditor and is currently a restriction to onboard auditors Remove reference to sector specific risk assessments in Table 1, for categories D, FII and G - this is too specific and sector specific training should be sufficient	Opportunity Identified
CPO 1	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Need to allow for grandfathering of existing auditors and requirements link to relevant benchmarking version	Opportunity Identified
CPO 1	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	remove the requirement for supervised audits and training. CPO shall define procedure and requirements for scope extensions	Opportunity Identified
CPO 1	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	leave requirement as is - relevant laws is sufficient	Agree
CPO 1	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Do not agree with WG comment - is contradictory to 4.15.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Having a "type" of non-conformity is not a requirement. Change to where the integrity of the certification could be at risk	Couldn't reach consensus
CPO 1	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree with WG comments	Opportunity Identified
CPO 1	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Would recommend that you just make it audit reports so that confidentiality would cover all reports and there isn't a need to then come up with different defiintions for audit reports released at different stages of the audit process.	Agree
CPO 1	Part II	5.19	Audit Reporting	The Certification Programme Owner shall ensure that necessary agreements are in place with the audited organisations and the Certification Bodies so that the audit records are available on request to the Certification Programme Owner and to GFSI.		GFSI requests these reports and they are sent to an undisclosed email address. This should be addressed, also to manage GDPR requirements. Information should be sent to known recepients.	Misunderstood
CPO 1	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	"Any recognition may be suspended. Do not agree with WG comment - this would add further complexity to the system, and an e-solution is different to a certificate. CPO suspensions are published on the GFSI website already. Keep requirement unchanged. Adding another logo will cause confusion to the marketplace. If GFSI is moving forward with an e-solution, this is not needed. This adds complexity to the process since the certificate is issued by the certification body. "	Couldn't reach consensus
CPO 1	Part II	5.27	Management of Certification	The Certification Programme Owner shall define minimum requirements for Certification Bodies considerations when organisations switch between GFSI-recognised Certification Programmes. This should include but not be limited to an evaluation of the organisation's audit history, last unannounced audit, etc.		GFSI recognized programmes do not all operate under the same accreditation norms, and therefore checking audit history and unannounced audits are not practical. Change last part of requirement as follows: This shall include a confirmation that the certification is still valid at the time of switching.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part II	5.31	Use of ICT during the audit	With the exception of audits under the scope of recognition "FII - Broker", At least part of the annual full audit shall be carried out on site.		Include an allowance for full remote audits in the case of serious event, e.g. force majeure, war, pandemic, etc.	Couldn't reach consensus
CPO 1	Part II	5.34	Use of ICT during the audit	The CPO shall specify the maximum period of time between the beginning and the end of all audit activities included in the audit duration to maintain the audit efficiency and integrity. That period of time shall not exceed 30 days.		Clarify that the 30 day timeline refers to a single audit being carried out, and does not apply to the timeline between a Stage 1 and Stage 2 audit, or auditing the sites in a multi-site certification.	Couldn't reach consensus
CPO 1	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	1. Align with ISO 22003 that only allows multi-site certification for FCC A, B, E, F and G 2. Cannot comment until the draft text is made available for comment	Opportunity Identified
CPO 1	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	Do not agree with WG comment as % sites of large multi-site organizations would not be a small number. Propose to add as follows: If necessary, a small number of the sample sites may be audited prior to the audit of the central function when justified.	Couldn't reach consensus
CPO 1	Part II	6.16	Internal audit	Clear requirements for internal auditors and technical reviewers shall be defined, documented and reviewed by the Certification Body.	Clear requirements for internal auditors and ~~technical~~ reviewers shall be defined, documented and reviewed by the Certification Body.	Keep requirement as is	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part II	6.21	Site audit sampling	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. 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.	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. 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	Add ISO 22003-1 or ISO 22003-2 as applicable, as sampling requirements are set out in these normative accreditation documents, that are different to IAF MD1. Also note that IAF MD1 only applies to management system certification, so need to be clear that it applies to all CPOs	Agree
CPO 1	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable	Opportunity Identified
CPO 1	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable	Opportunity Identified
CPO 1	Part II	6.27	Management of non-conformities	If the central function, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including the central function and all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.	Define "critical Certification Programme requirements" or suggest to replace by "leading to major non conformities". Some members suggested " fundamental certification programme requirements".	Change to: fails to meet the certification programme requirements (including not addressing any NCs raised within the defined timelines)	Couldn't reach consensus
CPO 1	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	The certificate shall only be issued to the multi-site organization, not individual sites, as this is in contradiction to the accreditation requirements. In terms of a multi-site - the central function is responsible and HO terminology should not be introduced here.	Agree
CPO 1	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	20 is aligned with ISO 22003, so do not change as it will lead to inconsistency with an international approach	Opportunity Identified
CPO 1	Part II	6.34	General requirements	A Certification Programme shall certify each Tier 1 facility site of a company's distribution and / or warehouse operations with each T1 site having its own single certificate. However, a multi-site approach may be used to include all T2 or below (e.g. T3) satellite sites linked to the T1 organisations' certification.		Align the sampling approach with ISO 22003, and apply to FCC E, F & G	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part II	6.35	General requirements	All sites within a multi-site sampling programme shall be operating under the same storage conditions (e.g. ambient stable, refrigerated, frozen or combinations of these) and have the same risk profile (e.g. size of site, shift patterns, management structure and employee numbers). Therefore, it is recognised that an organisation could have several multi-site sampling programmes based on different process and risk profile, but these programmes shall be clearly defined and documented.		Align the sampling approach with ISO 22003, and apply to FCC E, F & G	Couldn't reach consensus
CPO 1	Part II	6.36	Site audit sampling	The sample size shall meet the requirements defined in the table 2.		Align the sampling approach with ISO 22003, and apply to FCC E, F & G	Couldn't reach consensus
CPO 1	Part III FSMS	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.		It is not clear in this whole section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements and resubmitted for commenting once clarified; Agree if requirement applies to categories as per current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K	Couldn't reach consensus
CPO 1	Part III FSMS	1.2	Management responsibility	A clear organisational structure identifying the job functions and responsibilities of at least those employees whose activities affect Hygienic Design shall be established, implemented and maintained.		Agree if requirement applies to categories as per current v 2020.1: J1	Opportunity Identified
CPO 1	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	As with Part III HACCP comments - the term 'latest version' needs a system of change management as a change to a Codex document cannot immediately be incorporated into the Standards - the benchmark needs to be clear on what it is trying to achieve - this requirment is about a site's senior management commitment, the evidence of that it built into the site's processes as defined elsewhere in this benchmark, therefore this addition doesn't add value; Requirement applies to categories as per current v 2020.1: C0,C2, C1, C3, C4, A1,A2, B1, B2, B3, D, E, F1, F2, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	2.2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Hygienic Design Management System shall be provided.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	3	Management review	The senior management shall review all elements of the Food Safety Management System, including 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.		Agree if this requirement applies to categories A1, A2, B1, B2, B3,C0,C1,C2,C3,C4,D,E,F1, F2,G, I ,K as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	3.2	Management review	The organisation's senior management shall review the verification of the Hygienic Design System at planned intervals, to ensure their continuing suitability, adequacy and effectiveness.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	4.1	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation (both countries of production and intended sale).		Agree if this requirement applies to categories A1, A2, B1, B2, B3,C0,C1,C2,C3,C4,D,E, F1,G, I ,K as per the current v 2020.1	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 1	Part III FSMS	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).		Agree if this requirement applies to category F2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	4.3	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation.		Agree if this requirement applies to category G as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	4.4	Legislation	Procedures shall be established, implemented and maintained to ensure that buildings and equipment are legally compliant in the hygienic design requirements in the country of known implementation / sale.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1,C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	5.2	Hygienic Design Management System	A Hygienic Design Management System shall be established, implemented, maintained and continuously improved.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1 C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I,K	Agree
CPO 1	Part III FSMS	6.2	Hygienic Design Policy	A clear, concise and documented Hygienic Design policy statement shall be in place, as well as measurable objectives specifying the organisation's commitments to meet the food safety needs of its products		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1,C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I,K	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to category F2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	7.2	Food defence	A documented food defence plan shall be in place specifying the measures implemented to mitigate the public health risks from any identified food defence threats.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1,C3, C4, A1, A2, B1, B2, B3, D, E, F1, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to category F2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	7.3	Food defence	This food defence plan shall be supported by the Food Safety Management System.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1,C3, C4, A1, A2, B1, B2, B3, D, E, F1, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	7.3.1	Food defence	The agent / broker shall ensure that their suppliers' food defence plan is supported by the suppliers' Food Safety Management System.		Agree if this requirement applies to category F2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	8.1	Food fraud	A food fraud vulnerability assessment procedure shall be established, implemented and maintained to identify potential vulnerability and prioritise food fraud mitigation measures.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1,C3, C4, A1, A2, B1, B2, B3, D, E, F1, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	8.2	Food fraud	A documented food fraud plan shall be in place specifying the measures implemented to mitigate the public health risks from the identified food fraud vulnerabilities.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1,C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	8.3	Food fraud	This food fraud mitigation plan shall be supported by the organisation's Food Safety Management System.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1,C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part III FSMS	8.4	Food fraud	The agent / broker shall ensure that their suppliers comply to key elements FSM 8.1, 8.2, 8.3		Agree if this requirement applies to category F2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1,C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	9.1.2	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 Hygienic Design Management System.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	9.2.1	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the food if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1,C3, C4, A1, A2, B1, B2, B3, E, F1, G, I	Opportunity Identified
CPO 1	Part III FSMS	9.2.2	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the feed if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.		Agree if this requirement applies to category D as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	9.2.3	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the packaging if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.		Agree if this requirement applies to category K as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	9.2.4	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the lifetime of buildings/equipment if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Do not agree with WG proposal, leave requirement as is Applies to requirements for C0, C2, C1, C3,C4. A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K, J1 as per current v 2020.1	Misunderstood
CPO 1	Part III FSMS	10.2	Specified requirements / Specifications	A review process of the specified requirements or specifications shall be in place.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1,C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I , K, J1	Opportunity Identified
CPO 1	Part III FSMS	10.3	Specified requirements / Specifications	The Food Safety Management System shall ensure that packaging used to impart or provide a functional effect on the safety of the food to be packed in this packaging, such as shelf life extension shall, where known, be effective within its own specified criteria.		Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part III FSMS	10.4	Specified requirements / Specifications	There shall be sufficient data to ensure food contact with the packaging is safe, and sufficient documentation of claims, according to the intended use, where recycled material, plant based material or functional additives are used.		Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	11	Procedures	Procedures and instructions shall be established, implemented and maintained for all processes and operations having an effect on food safety.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I,K , J1	Agree
CPO 1	Part III FSMS	12	Resource management	The resources needed to establish, implement, maintain, review and improve the Food Safety Management System shall be identified and assigned.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	12.2	Resource management	The resources needed to establish, implement, maintain, review and improve the Hygienic Design Management System shall be identified and assigned.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	13.1.1	Purchasing and supplier performance	Purchasing processes shall be controlled to ensure 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.		Agree if this requirement applies to categories as per the current v 2020.1: A1, A2, B1, B2, B3	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, D, E, F1, F2, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	13.1.3	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 regulatory requirements.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	13.1.4	Purchasing and supplier performance	A procedure shall be established, implemented and maintained to ensure that the newly purchased building/equipment meets the hygienic design specification.		Agree if this requirement applies to category J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	Do not agree with WG proposal, the additional text in red is already addressed in document control. Current categories in V 2020.1: C0,C2, C1, C3, C4, A1, A2, B1, B2, B3, E, F1, F2, G, I , K	Couldn't reach consensus
CPO 1	Part III FSMS	13.2.2	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 feed still conforms to the specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded.		Agree if this requirement applies to category D as per the current v 2020.1	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part III FSMS	13.2.3	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 packaging still conforms to the specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded.		Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	13.2.4	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 buildings/equipment 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.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I,K	Opportunity Identified
CPO 1	Part III FSMS	13.3.2	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 Hygienic Design Management System.		Agree if this requirement applies to categories as per the current v 2020.1: J1	Opportunity Identified
CPO 1	Part III FSMS	13.4	Purchasing and supplier performance	Specific procedures shall be in place for the procurement of animals, fish and seafood which are subject to control of prohibited substances (e.g. pharmaceuticals, veterinary medicines, heavy metals and pesticides).		Agree if this requirement applies to category C0 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	13.5	Purchasing and supplier performance	Specific provisions shall be in place for the procurement of feed from approved, certified sources.		Agree if this requirement applies to categories as per the current v 2020.1: A1, A2	Opportunity Identified
CPO 1	Part III FSMS	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).		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1,B2, B3, E, F1, F2, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	14.1.2	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 feed (minimum one step forward).		Agree if this requirement applies to category D as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	14.1.3	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 packaging (minimum one step forward).		Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	14.1.4	Traceability	Specifically, procedures and systems shall be established, implemented and maintained to ensure identification of input feed and feed additives, including, as a minimum, the name and address of the producer, lot or batch number. Specifically, procedures and systems shall be established, implemented and maintained to ensure identification of any veterinary medication purchases and treatment.		Agree if this requirement applies to categories as per the current v 2020.1: A1, A2	Opportunity Identified
CPO 1	Part III FSMS	14.1.5	Traceability	Procedures shall be established, implemented and maintained to ensure the ability to trace or follow a material or article critical to food safety through all stages of purchase, construction and distribution (minimum one step forward and one step backward).		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	14.2	Traceability	Documented tests of the traceability system shall be undertaken to ensure this is operating effectively.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I,K	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part III FSMS	14.3	Traceability	Appropriate procedures and systems shall be established, implemented and maintained to ensure the traceability of all edible parts of the carcass is maintained until the carcass is deemed fit for human consumption which includes blood for human consumption.		This requirement applies to category C0 as per the current v 2020.1, but it should not be requried to specify the parts of the carcass and blood specifically - suggest to remove this requirement as it is already covered under 14.1.1	Couldn't reach consensus
CPO 1	Part III FSMS	14.4	Traceability	Livestock and the records associated with that livestock that has been treated with veterinary medicines and are within the manufacturer's recommended waiting period for that course of treatment shall be clearly identified.		Agree if this requirement applies to categories as per the current v 2020.1: A1, A2	Opportunity Identified
CPO 1	Part III FSMS	14.5	Traceability	Specific policies shall be in place for the procurement of approved veterinary medicines.		Agree if this requirement applies to categories as per the current v 2020.1: A1, A2	Opportunity Identified
CPO 1	Part III FSMS	15	Product development	Product design and development procedure shall be established, implemented and maintained for new products and changes to product or manufacturing processes to ensure safe and legal products are produced.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, D,E, F1, I, K	Opportunity Identified
CPO 1	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	Element title in line 61 appears to be incorrect. Agree with element content if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, B3, E, F1, G, K	Opportunity Identified
CPO 1	Part III FSMS	16.2	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.	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.	Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Agree if it applies to scopes B3, C0, C1, C2, C3, C4 and E. It is currently not clear which categories this requirement will apply to. It should not apply to all categories	Opportunity Identified
CPO 1	Part III FSMS	17.1	Control of measuring and monitoring equipment / devices	The equipment / devices used to measure parameters critical to ensure food safety shall be identified.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D,E, F1,G, I , K	Opportunity Identified
CPO 1	Part III FSMS	17.2	Control of measuring and monitoring equipment / devices	The identified equipment / devices shall be regularly calibrated; calibration shall be traceable to a national or international standard or method.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D,E, F1, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	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.	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 - add intended consumption as well?	Do not agree with WG comment - labelling in compliance with legislation is sufficient	Couldn't reach consensus
CPO 1	Part III FSMS	18.1.2	Product labelling and product information	Finished product shall be labelled to ensure safe use of feed, in compliance with the applicable food safety legislation in the country of intended sale.		Agree if this requirement applies to category D as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to categories as per the current v 2020.1: C2, C3, C1, C4, D, E , F1, F2, K	Opportunity Identified
CPO 1	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	New requirement if it applies to C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, E, F1, F2, G, I, K, J1, J2	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 1	Part III FSMS	18	Printed material control	Procedures shall be established, implemented and maintained to manage packaging materials printed with product ingredient list(s), allergens, identification code and other critical information and prevent mis-printing.		Element number is missing the last digit. Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	19.1	Testing	A procedure shall be established, implemented and maintained to ensure that analyses of food parameters critical to food safety are undertaken by competent laboratories and using appropriate sampling and testing methods and that such analyses are performed in accordance with the applicable requirements of ISO/IEC 17025.		Suggest to remove: in accordance with applicable requirements of ISO/IEC 17025 - it is difficult to audit, and encompassed in the GFSI definition of a competent laboratory Categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, I, K	Couldn't reach consensus
CPO 1	Part III FSMS	19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		Agree if this requirement applies to categories as per the current v 2020.1: C0,C2, C1, C3, C4 , B3, I	Opportunity Identified
CPO 1	Part III FSMS	19.3	Environmental monitoring	A risk-based approach shall be in place to define the environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		Agree if this requirement applies to categories E, F1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	19.4	Testing	Where external testing of construction materials, buildings or equipment is required, it shall be carried out by an accredited testing facility or one that follows relevant international testing guidelines.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	19.5	Testing	Where in-house testing is carried out, calibration of equipment that is critical to food safety shall be carried out against national standards or other accurate means.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	20	Internal audit	An internal audit procedure shall be established, implemented and maintained; it shall cover all elements of the Food Safety Management System.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	20.2	Internal audit	An internal audit procedure shall be established, implemented and maintained; it shall cover all elements of the Hygienic Design Management System.		Agree if this requirement applies to category J1 as per the current v 2020.1	Couldn't reach consensus
CPO 1	Part III FSMS	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.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D,E, F1, F2, I, K, J1,G	Couldn't reach consensus
CPO 1	Part III FSMS	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.		Requirement seems to be split - row 79 on product recall - then remove reference to withdrawal in this line, as it is included in row 80; Current categories in v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I,K	Misunderstood
CPO 1	Part III FSMS	22	Serious incident management	An incident management procedure, including product withdrawal, shall be established, implemented and maintained. Withdrawal procedure shall be regularly tested for effectiveness.		New (Split) requirement if it applies to C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K, J1, J2 focuses on testing of withdrawal only, recall addressed in the above. Withdrawal has not been removed from line 79.	Misunderstood
CPO 1	Part III FSMS	22.2	Serious incident management	In case of any livestock found to be infected with a notifiable disease, parasite or condition that would compromise food safety, measures for the containment and quarantine shall be established and implemented.		Agree if this requirement applies to categories as per the current v 2020.1: A1, A2	Opportunity Identified
CPO 1	Part III FSMS	22.3	Serious incident management	Measures for the withdrawals and containment of contaminated feedstuff shall be established and implemented.		Agree if this requirement applies to categories as per the current v 2020.1: A1, A2	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part III FSMS	22.4	Serious incident management	An incident management procedure, including product recall, withdrawal, and retrofit shall be established, implemented and maintained. The recall procedure shall be regularly tested for effectiveness.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	23	Product release	A product release procedure shall be established, implemented and maintained.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2,B3, D, E, F1, F2, G, I, K	Opportunity Identified
CPO 1	Part III FSMS	23.2	Product release	Commissioning or building/equipment release procedures shall be established, implemented and maintained.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	23.3	Product release	Hygienic design construction specifications shall be verified for buildings and equipment prior to dispatch or hand-over to the customer.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K,J1	Opportunity Identified
CPO 1	Part III FSMS	24.2	Control of non-conformity	This procedure shall include provisions for food that is found to be damaged and / or returned from customers.		Agree if this requirement applies to categories as per the current v 2020.1: E, F1, G	Opportunity Identified
CPO 1	Part III FSMS	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.		Agree if this requirement applies to categories as per the current v 2020.1: C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K, J1	Opportunity Identified
CPO 1	Part III FSMS	26	Change Management	Change control shall be undertaken and documented to evaluate the impacts of any changes/ modifications on equipment/building hygienic design.	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.	Agree if this requirement applies to category J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	New requirement if it applies to C0, C2, C1, C3, C4, A1, A2, B1, B2, B3, D, E, F1, F2, G, I, K, J1, J2	Opportunity Identified
CPO 1	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements and resubmitted for commenting Agree with requirement if applies to categories as per the current v 2020.1: B3, C0, C1,C2, C3, C4, D, E ,K , I	Opportunity Identified
CPO 1	Part III GMP	1.1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe feed and to prevent its contamination.		Agree if this requirement applies to category D as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	1.2	Site environment	The site shall be located and maintained to enable the reception, storage, production and offering of safe food and to prevent its contamination.		Agree if this requirement applies to category F1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	1.3	Site environment	The site shall be located and maintained to enable the reception, storage, and distribution of safe food and to prevent its contamination.		Agree if this requirement applies to category G as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	1.4	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe packaging and to prevent its contamination.		Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part III GMP	2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the production of safe products.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0,B3, C1,D,E,K	Opportunity Identified
CPO 1	Part III GMP	2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the offering of safe products.		Agree if this requirement applies to category F1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the reception, storage, and distribution of safe products.		Agree if this requirement applies to category G as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	3	Site design, construction, layout and flow of operations	The site, both the exterior and the interior, shall be designed, constructed and maintained to minimise food safety risks. The layout and flow of operations shall be suitable for the intended purpose and designed to minimise food safety risks.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0,B3,D,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	3.2	Site design, construction, layout and flow of operations	The building in which equipment is manufactured shall be designed, constructed and maintained to minimise any contamination of the manufactured equipment which may affect food safety.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	4.1	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to prevent or minimise risk of contamination and cross-contamination of purchased materials, work in progress, rework, packaging and finished product covering all aspects of food safety.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0,B3,D,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	4.2	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to maintain product integrity and regulatory compliance regarding the disposal, resale, donation, restocking or reuse of product being salvaged or reclaimed.		Agree with requirement if applies to categories as per the current v 2020.1: E,F1	Opportunity Identified
CPO 1	Part III GMP	4.3	Product contamination risk and segregation	Procedures and control measures shall be in place to manage the use of feed medication where applicable.		Agree if this requirement applies to category D as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	4.4	Product contamination risk and segregation	The use of ingredients that contain substances that can be deleterious to certain classes of animals shall be appropriately managed.		Agree if this requirement applies to category D as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	4.5	Product contamination risk and segregation	An inspection process shall be in place at lairage and / or at evisceration to ensure animals are fit for human consumption.		Agree if this requirement applies to category C0 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	4.6	Product contamination risk and segregation	Defined post-slaughter time and temperature requirements shall be in place in relation to the chilling or freezing of product.		Agree if this requirement applies to category C0 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	4.7	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to ensure printed materials are not mixed or intermingled with other materials including in-process and reworked materials.		Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	4.8	Product contamination risk and segregation	Suitable employee, contractor and visitor access requirements shall be in place such that food safety is not compromised if construction is undertaken at a site in which food is being handled.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	4.9	Product contamination risk and segregation	Procedures shall be in place to prevent the cross-contamination of food from hazards created by construction activities if construction is undertaken at a site in which food is being handled.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	4.10	Product contamination risk and segregation	Prior to building commissioning or equipment dispatch, buildings / equipment shall be cleaned by the manufacturer / constructor using appropriate methods that will remove all food safety hazards associated with the construction process. Cleaning should be recorded and verified.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III 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 should be recorded and verified.	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 be recorded and verified.	Agree if this requirement applies to category J2 as per the current v 2020.1	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part III GMP	5	Employee facilities	Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0,B3,D,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	6.1	Personal hygiene, protective clothing and medical screening	Documented personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0,B3,D,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	6.2	Personal hygiene, protective clothing and medical screening	Suitable protective clothing shall be provided to minimise food safety risks.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0,B3,D,E,K	Opportunity Identified
CPO 1	Part III GMP	6.3	Personal hygiene, protective clothing and medical screening	A medical screening procedure shall be established, implemented and maintained to identify conditions impacting food safety and that any person affected shall immediately report illness or symptoms to management, subject to legal restrictions in the country of operation.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0,B3,D,E,F1,K	Opportunity Identified
CPO 1	Part III GMP	6.4	Personal hygiene, protective clothing and medical screening	The requirements 6.1, 6.2, and 6.3 shall apply to employees, contractors and visitors commensurate to their impact on food safety.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0,B3,D,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	7	Training	Procedure shall be established, implemented and maintained to ensure that all employees are trained, and retrained as necessary to have an understanding in food safety, commensurate with their activity.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0,B3,D,E,F1,G,K	Couldn't reach consensus
CPO 1	Part III GMP	7.2	Training	Procedures shall be established, implemented and maintained to ensure all employees and contractors involved in building and equipment evaluation, specification, purchase and hygienic design shall be trained in hygienic design principles appropriate to their tasks and to the hygienic design requirements of the building or equipment for its intended use.		Agree if this requirement applies to categories J1, J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	7.3	Training	Procedure shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	Procedures shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	8.1.1	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.	Procedures for housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.	Agree with requirement if applies to categories as per the current v 2020.1: C2, C3, C4,C1,C0, B3,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	8.1.2	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a feed safety risk.	Procedures for housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a feed safety risk.	Agree if this requirement applies to category D as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	8.1.3	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks of cleaning shall be validated and verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a packaging safety risk.		Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	8.2	Housekeeping, cleaning and disinfection	Cleaning facilities, equipment and chemical materials shall be suitable for their intended use and shall be stored and used appropriately.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3,C4,C1,C0,B3,D,E,F1,G,K	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part III GMP	9	Rework	Rework shall be managed to minimise food safety risks and not to compromise traceability.		Agree with requirement if applies to categories as per the current v 2020.1: C2, C3,C4,C1,D,K	Opportunity Identified
CPO 1	Part III GMP	10	Site inspections / checks	A programme of site inspections / checks shall be established, implemented and maintained to ensure the site environment and processing equipment are maintained in a suitable condition to ensure food safety, as applicable to the activity of the site.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0, B3, D,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3, C4,C1,C0, B3, D,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	New requirement if it applies to C2, I, C3,C4,C1,C0, B3,D,E,F1,G,K, J1, J2; Ingredient is not defined in the glossary, so shouldn't be used here without a glossary definition. Also note that potable water on raw materials isn't always potable e.g. raw fish is often washed with salt water during catch and prior to filleting. There may also be examples in fresh produce for removing soil.	Opportunity Identified
CPO 1	Part III 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.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3,C4,C1,C0, B3,D1,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	12.2	Waste management	A system shall be in place to control the disposal of trademarked material.		Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3,C4, C1,C0, B3,D,E,F1,G,K, J1	Couldn't reach consensus
CPO 1	Part III GMP	14	Reception of purchased materials	Appropriate procedures for the reception of purchased materials shall be established, implemented and maintained to assure that only materials that meet food safety requirements are accepted.		Agree with requirement if applies to categories as per the current v 2020.1: C2, C3,C4,C1,D,E,F1,K	Opportunity Identified
CPO 1	Part III GMP	15	Transport	All containers and vehicles used for transportation in a way that could impact food safety shall be designed, constructed and maintained to minimise food safety risks. They shall be suitable for the intended purpose		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3,C4,C1,C0, B3, D,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	15.2	Transport	Manufactured equipment shall be stored and transported to the final customer in a manner that prevents contamination of the equipment which may affect food safety.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	16.1	Storage	Food shall be held or stored in designated areas and handled under controlled conditions to minimise food safety risks.		Agree with requirement if applies to categories as per the current v 2020.1: C2, C3,C4,C1,C0, B3,E,F1,G,K	Opportunity Identified
CPO 1	Part III GMP	16.2	Storage	Feed shall be held or stored in designated areas and handled under controlled conditions to minimise food safety risks.		Agree if this requirement applies to category D as per the current v 2020.1	Opportunity Identified
CPO 1	Part III GMP	16.3	Storage	Packaging shall be held or stored in designated areas and handled under controlled conditions to minimise food safety risks.		Agree if this requirement applies to category I as per the current v 2020.1	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 1	Part III GMP	17	Stock management	A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3,C4,C1,C0, B3,D,E,G,F1,K	Opportunity Identified
CPO 1	Part III GMP	18	Equipment	Equipment shall be suitable for the intended purpose. Equipment shall be designed, constructed, maintained, used and stored to minimise food safety risks.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3,C4,C1,C0, B3,D,E,G,F1,K	Opportunity Identified
CPO 1	Part III GMP	19	Maintenance	Effective planned maintenance shall be in place for the site and equipment to minimise food safety risks. Maintenance activities shall not represent food safety risks.		Agree with requirement if applies to categories as per the current v 2020.1: C2, I, C3,C4,C1,C0, B3,D,E,G,F1,K	Opportunity Identified
CPO 1	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	It is not clear in this whole section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements and resubmitted for commenting; Assume this requirement applies to A1, A2, B1, B2 B3,C0,C1,C2,C3,C4,D, E, F1,G,I, K as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	Remove reference to "latest version" for Codex - a transition period should always apply; Assume this requirement applies to A1, A2, B1, B2, B3 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Remove reference to "latest version" for Codex - a transition period should always apply; Assume this requirement applies to C0, C1, C2, C3, C4 and K as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	Remove reference to "latest version" for Codex - a transition period should always apply; Assume this requirement applies to cat I as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Agree if this requirement applies to cat F2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.2	Hazard and Risk management system	The scope of the Hazard and Risk Management System shall be defined per product / product category and / or per process or production step.		Agree if this requirement applies to categories A1, A2, B1, B2 B3,C0,C1,C2,C3,C4,D,E,F1, F2,G,I ,K as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.3	Hazard and Risk management system	The Hazard and Risk Management System shall be applicable to the site's scope of certification.		Agree if this requirement applies to categories A1, A2, B1, B2 B3,C0,C1,C2,C3,C4,D,E,F1, F2,G,I, K as per current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	Agree if this requirement applies to categories A1, A2, B1, B2 B3,C0,C1,C2,C3,C4,D,E,F1, F2,G,I ,K as per current v 2020.1	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 1	Part III HACCP	1.5	Hygienic design process	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new buildings/equipment.	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade or improvements.	Agree if this requirement applies to categories J1, J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.6	Hygienic design process	The hygienic design and suitability of buildings and equipment shall be evaluated throughout their life cycle from the design concept, through construction, purchasing and during use, until the end of their intended life.	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.	Agree if this requirement applies to categories J1, J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.7	Risk assessment	A documented hygienic design risk assessment for food safety hazards on new and existing buildings/equipment shall be established, implemented and maintained. It shall include as a minimum the following considerations: intended use, food safety hazard identification, evaluation.		Agree if this requirement applies to categories J1, J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.8	Risk assessment	The hygienic design risk assessment shall be reviewed when any change to the building/equipment/product/process is made or other hazards arise, or at a minimum frequency defined by applicable laws and regulations.		Agree if this requirement applies to category J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.9.1	Intended use	The intended use of the building/equipment shall be specified.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.9.2	Intended use	The intended use of the building/equipment shall be described, as a specification for the intended purchase of new buildings and equipment.		Agree if this requirement applies to category J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.10	Hygienic design principles	Appropriate building/equipment hygienic design principles shall be adopted based on the designated risk assessment, appropriate to their intended use and taking into consideration a user specification.		Agree if this requirement applies to categories J1, J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.	Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.12	Hygienic design principles	Buildings and equipment shall be designed and constructed to avoid favourable growth conditions (for microorganisms, pests and their harbourage), appropriate to their intended use.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.13	Hygienic design principles	Buildings and equipment shall be designed to prevent contamination, appropriate to their intended use.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.14	Hygienic design principles	Wherever relevant, recognised hygienic design standards/guidance shall be consulted for the design and construction of buildings and equipment, appropriate for their intended use.		Agree if this requirement applies to category J1 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.15	Hygienic design principles	Appropriate hygienic design principles shall be adopted for the installation of new equipment and construction of buildings at sites handling food.		Agree if this requirement applies to categories J1, J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.16	Hygienic design principles	Hygienic design principles shall be adopted to ensure the maintenance of the hygienic performance of the buildings/equipment, appropriate for their intended use.		Agree if this requirement applies to category J2 as per the current v 2020.1	Opportunity Identified
CPO 1	Part III HACCP	1.17	Hygienic design mitigation	Appropriate measures (with frequencies) shall be specified, undertaken accordingly and documented to mitigate any remaining food safety risks identified in the hygienic design risk assessment following building/equipment construction, purchase and installation.		Agree if this requirement applies to category J2 as per the current v 2020.1	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 10	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Need to rephrase. Significant changes, not clear enough. For example, management change should not prevent the rebenchmarking process. Recommend to delete examples since the examples provided may or may not impact the quality of the delivery of the GFSI recognized certification program and could be interpreted as absolutes.	Opportunity Identified
CPO 10	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Agree with WG comments - the process for new and existing CPOs shall not be the same. Remove 12 months operation for existing benchmarked CPOs; for new versions of a currently recognised programme, only need to prove that new version of the Scheme complies.	Opportunity Identified
CPO 10	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	Do not agree with WG comment - an ongoing investigation is not grounds to put benchmarking on hold. Examples for types of investigations and timeframe of when the CPO could re-apply is needed.	Agree
CPO 10	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	The process for new and existing CPOs shall not be the same. Proposal to remove 12 months operation for existing benchmarked CPOs and ten certificates for each GFSI scope of recognition to be included in the application. For new versions of a currently recognised programme, only need to prove that new version of the Scheme complies with the current benchmarking requirements through a document assessment, implementation to be verified during the regular MCAs and workplan to facilitate continuous benchmarking Suggest changing the eligibility criteria for recognized programs so that GFSI can perform a continued recognition assessment of an existing GFSI recognized programs to the new requirements prior to implementation.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 10	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	The full application process should not apply to existing recognized CPOs -a re-benchmarking process should be in place, based on a GAP assessment and be defined under continued recognition.	Couldn't reach consensus
CPO 10	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		The full application process should not apply to existing recognized CPOs -a re-benchmarking process should be in place, based on a GAP assessment and be defined under continued recognition; and no need to demonstrate market demand by submitting 10 certificates per n category.	Couldn't reach consensus
CPO 10	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.	The full application process should not apply to existing recognized CPOs -a re-benchmarking process should be in place, based on a GAP assessment and be defined under continued recognition; and no need to demonstrate market demand by submitting 10 certificates per Food chain category.	Opportunity Identified
CPO 10	Part I	4	Methodology	GFSI Executive Director	GFSI Director	GFSI may reassign the Benchmark Leader at any time, if properly justified and deemed necessary to do so, with sufficient notification to the CPO. The current workplan of the CPO shall not be negatively impacted as a result.	Couldn't reach consensus
CPO 10	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Suggest change to 12 months to allow for effective change management and implementation at site level.	Opportunity Identified
CPO 10	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Preventative actions is not appropriate at CPO level; keep current wording as is: Corrective action planning	Agree

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 10	Part I	5	Key procedural steps	A => Application		Transition period of recognition needs to be defined especially when a new version of the GFSI benchmarking requirements is about to be published.	Misunderstood
CPO 10	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Steering Committee decision and communicating to the CPO, e.g. 2 weeks.	Couldn't reach consensus
CPO 10	Part I	5	Key procedural steps	B => Desktop Review/Self assessment			Opportunity Identified
CPO 10	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Submitting appeals to the GFSI Executive Director in the case of appealing a decision by the GFSI Executive Director is not impartial. An alternative option shall be available in this case.	Misunderstood
CPO 10	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Need to have an independent appeals committee that has good understanding of the benchmarking requirements and representative of the scope of the appeal. Relevant representatives to include: AB, CB, CPO, site(relevant to the appeal), auditor, academic, retailer, Have a list and then pick from the list on the appeal.	Agree
CPO 10	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		Sanction process should be transparent including the escalation process including what would initiate a sanction and the timelines involved. A definition is needed for non-alignment as its not in current glossary.	Agree
CPO 10	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time for stakeholder communication plan, prior to the suspension being published on the GFSI website.	Agree
CPO 10	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		The CPO shall be informed in writing in the case of withdrawal, prior and in sufficient time for communication planning to the withdrawal being published on the GFSI website.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 10	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	This assessment process should be open to full Part II and Part III assessments for GFSI recognized organizations going through the recognizition process to a new version of the GFSI benchmarking requirements.	Opportunity Identified
CPO 10	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.		Ownership definition needs to be aligned with Part 1.	Agree
CPO 10	Part II	2.6	Relationship with Accreditation Bodies	The Certification Programme Owner shall have an agreement with the Accreditation Bodies to ensure that the Certification Programme Owner is informed if a Certification Body has its accreditation withdrawn or suspended.		Some accreditation bodies are public institutions, therefore a CPO cannot force them to sign an agreement and add thisrequirement in.	Opportunity Identified
CPO 10	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.		NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011: it is not possible for a CPO to demonstrate this level of conformance. It should be enough if their AB is IAF MLA signatory.Not in favour of this last part of the element.	Agree
CPO 10	Part II	2.14	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies shall be publicly available and precisely defined in terms of the exact name of the Certification Programme in scope, its revision number and / or date and its sector of application reference (e.g. industry sector).		What and where something is publicly available is open to interpretation.	Opportunity Identified
CPO 10	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		This is covered by the AB assessment. Duplication of work by the CPOs.	Couldn't reach consensus
CPO 10	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Remove: "at all times"	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 10	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Reporting of recalls should be removed, as not all recalls can be reported to GFSI. Clarification on what the expectations are should be identified. Do not agree with WG examples of incidents, this will cause an extreme high amount of notification that the CB struggle to handle and that we as CPOs don't know what GFSI expects us to do with.GFSI has to define what incidents are considered to bring GFSI into disrepute, and define the incident procedure, including timelines for communications from GFSI to CPO and vice versa.	Opportunity Identified
CPO 10	Part II	3.12	Desktop Assessment	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance on audit and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records.	Leave requirement as it its, do not agree with WG proposal.	Agree
CPO 10	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		Remove product recalls from the list of risk factors as recalls by a company is not a metric linked to the performance of a CB.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 10	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	Proposal to change current requirement as follows: The Certification Programme Owner shall define and have a dedicated program to monitor Key Performance Indicators for Certification Bodies. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year. Not in favour to have this information publicly available. Each CPO defines their KPIs, this information is not comparable and make create confusion and no added value.	Couldn't reach consensus
CPO 10	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		This is duplication of accreditation requirements.	Couldn't reach consensus
CPO 10	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	Remove examples and leave only the first part of the element content up to: as specified by the CPO, and include that auditor performance includes the evaluation of soft skills.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 10	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	Do not agree with with WG comments - CPOs to define the requirements for witness assessments.	Opportunity Identified
CPO 10	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree. Remove the emphasis on the specific education requirement. Education can be included in the auditor qualifications however, the years of industry and auditing experience, in addition to continuing education courses should be granted more value.	Opportunity Identified
CPO 10	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Cannot include reference to GFSI auditor training and professional development framework as it has not been approved/completed. It is therefore not possible to determine whether this is suitable in this public consultation.	Opportunity Identified
CPO 10	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Auditors that were qualified a long time ago, are being questioned and their level of competence. The grandfathering principle needs to be allowed for existing auditors. The benchmarking requirements shall apply for new applicants and not considered retroactively (general legal principle).	Opportunity Identified
CPO 10	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Allow to recognize other GFSI recognized CPO witness audits.	Opportunity Identified
CPO 10	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	Remove the requirement for supervised audits and training. CPO shall define procedure and requirements for scope extensions. Not in favour of ICT in this case.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 10	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Leave requirement as is - relevant laws is sufficient	Agree
CPO 10	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Change to 3 against the relevant GFSI CPO; WG comment is contradictory to 4.15.	Couldn't reach consensus
CPO 10	Part II	4.15	Maintenance of Auditor Skills and Competence	In specific situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.		If 4.14 is accepted. 4.15 is not needed.	Opportunity Identified
CPO 10	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Having a "type" of non-conformity is not a requirement. Proposal to change to where the integrity of the certification could be at risk.	Couldn't reach consensus
CPO 10	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree.Unannounced audit also needs be defined in the glossary.	Opportunity Identified
CPO 10	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Do not agree with WG comment - this would add further complexity to the system, and an e-solution is different to a certificate. CPO suspensions are published on the GFSI website already. Keep requirement unchanged.	Couldn't reach consensus
CPO 10	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	agree with WG	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 10	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Everything is public information, difficult to identify which ones.	Opportunity Identified
CPO 10	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Agree in principle, as a clear distinction is needed and doesn't exist at the moment. However, we cannot really comment until the draft text is made available for comment.	Opportunity Identified
CPO 10	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	The certificate shall only be issued to the multi-site organization, not individual sites, as this is in contradiction to the accreditation requirements. In terms of a multi-site - the central function is responsible and HO terminology should not be introduced here.	Agree
CPO 10	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	20 is aligned with ISO 22003, so do not change as it will lead to inconsistency with an international approach	Opportunity Identified
CPO 10	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	As with Part III HACCP comments - the term 'latest version' needs a system of change management as a change to a Codex document cannot immediately be incorporated into the Standards.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 10	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Do not agree with WG proposal - leave requirement as is.	Misunderstood
CPO 10	Part III FSMS	16.1	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	"where possible"is not clear enough from an auditing point of view - consider that sites can unlikely to be able to invest in a new production line and segregated area.	Agree
CPO 10	Part III FSMS	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.	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 - add intended consumption as well?	not agree with WG comment, intended use	Couldn't reach consensus
CPO 10	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	This should be covered in the management review process.	Couldn't reach consensus
CPO 10	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	The added wording is too prescriptive and doesn't allow for regional differences in terminology and risk.	Couldn't reach consensus
CPO 10	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements and resubmitted for commenting.	Opportunity Identified
CPO 10	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	There must be a system of change management for external references. Changes to an external reference documents cannot instantly be incorporated into a Standard.	Opportunity Identified
CPO 10	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	1.1.1, 1.1.2 and 1.1.3 are obviously designed for different GFSI scopes. However, GFSI have not listed which will be applied to which scope. It is therefore not possible to comment on the acceptability or otherwise of the wording to the specific scope.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 10	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	suggest to include the term **"Significant food safety hazards"** --> those hazards are those that requires control measures (CCP's - CP's/OPPR's). As definition: significant food safety hazard identified through the hazard assessment, which needs to be controlled by control measures.	Opportunity Identified
CPO 10	Part III HACCP	1.5	Hygienic design process	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new buildings/equipment.	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade or improvements.	Agree it is correct for new buildings and new equipment however the practicality and cost of significant changes to existing buildings and equipment could potentially be a barrier for some stakeholders to use these scopes.	Opportunity Identified
CPO 10	Part III HACCP	1.6	Hygienic design process	The hygienic design and suitability of buildings and equipment shall be evaluated throughout their life cycle from the design concept, through construction, purchasing and during use, until the end of their intended life.	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.	same as above	Misunderstood
CPO 10	Part III HACCP	1.7	Risk assessment	A documented hygienic design risk assessment for food safety hazards on new and existing buildings/equipment shall be established, implemented and maintained. It shall include as a minimum the following considerations: intended use, food safety hazard identification, evaluation.		If restricted to scopes JI and JII then they may be acceptable, but as detailed above they will not be acceptable if added to other scopes. This applies to all benchmark elements from 1.5 to 1.17.	Opportunity Identified
CPO 11	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	agree with the seggested change	Opportunity Identified
CPO 11	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Agree	Opportunity Identified
CPO 11	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Agree with the suggestion to allow for streamlining "continued" recognition of any new updates, including editions (1.2 ->1.2-1), versions (1.2 -> 2.0) when a current version is already recognized.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 11	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		We've found that this step includes a number of actions, including acceptance of CAP by the benchmark leader, review and acceptance by benchmark leader, review by the GFSI steering committee, and it is not clear who at GFSI is making this decision. Please make it more clear such as GFSI steering committee final decision if that is who finally makes the decision.	Misunderstood
CPO 11	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	the appeals process should include CPOs and CBs, however, industry could be the majority. Some issues are a matter of understanding the procedures at the CB or CPO and this unique industry, a panel that lacks this insight would be insufficient.	Couldn't reach consensus
CPO 11	Part II	1.10	Certification Programme Development and Maintenance	The Certification Programme shall be subjected to extensive stakeholder consultation during its development.			Opportunity Identified
CPO 11	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	To give context there have been food safety recalls that did not involve illnesses, should these be communicated to GFSI? If so, why? Agree with comments re: integrity (same as "serious"), and agree with the need for clear steps of action. SO, at what point does CPO inform GFSI of ongiong investigation? What actions will GFSI require of the CPO? Will the CPO require actions of the CB/operation at any point? Reminder that the scope of GFSI should be, is the CPO following it's procedures and assessing whether there is any risk ot the GFSI program.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 11	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	There is a need for witness assessments to be remote in special circumstances, but for the ongoing maintenance of an auditor, an on-site wintess is surely possible once per 4 years.	Opportunity Identified
CPO 11	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*		Opportunity Identified
CPO 11	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.		Couldn't reach consensus
CPO 11	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*		Opportunity Identified
CPO 11	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	This should remain per individual CPO page.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 11	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Totally agree, especially in the US. I think the typical trade-off is 5 years, but also, there needs to be some training.	Opportunity Identified
CPO 11	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	There has to be more room here for already qualified GFSI auditors across programs. If an auditor has been doing SQF farm audits, why then do they need to have GLOBALGAP additional 3 audit sign-off. Yes, the programs are different, but to the point above, there is serious shortage, and cross-program training is one of the easiest ways to support operations and auditors (job training/skills).	Opportunity Identified
CPO 11	Part II	4.10.2	Initial Auditor Qualification	The Certification Programme Owner shall ensure that the witness audit(s) carried out as part of the certification body's initial auditor qualification follows the standard audit plan agreed with the certified organisation, including the use of ICT if applicable, as long as this does not compromise the effectiveness of the assessment. The Certification Programme Owner shall ensure that the witness assessor is present on site for parts of the audit carried out on site.	Suggest to introduce a distinction for 1st approval where the entire witness audit should be conducted on site (no permitted use of ICT).	To a comment above, there will need to be room for exceptions here.	Opportunity Identified
CPO 11	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	Yes	Opportunity Identified
CPO 11	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Should be both country of production and country of destination.	Couldn't reach consensus
CPO 11	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	good change.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 11	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	I'm happy to see GFSI facilitate this discussion.	Opportunity Identified
CPO 11	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	The public does not need to know this. The buyer will receive the certificate which has UA/A or they will have access to the audit information directly. GFSI mandating another field on IT systems is not needed.	Couldn't reach consensus
CPO 11	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Absolutely disagree with a GFSI database. Agree with GFSI on the certificate, however.	Couldn't reach consensus
CPO 11	Part II	6.3	General requirements	All sites included in the scope of certification of a multi-site organisation shall be operated under the same Food Safety Management System and under the control of a central function.		It still suprises me that the central site does not have to be a legal entity nor be responsible for agricultural production or trade.	Couldn't reach consensus
CPO 11	Part II	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 and independent from the sites.	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 ~~and independent~~ from the sites.	Agree!	Agree
CPO 11	Part II	6.21	Site audit sampling	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. 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.	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. 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	please provide the specific IAF MD1 section/subsection.	Opportunity Identified
CPO 11	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1	please provide the specific IAF MD1 section/subsection.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 11	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1	please provide the specific IAF MD1 section/subsection. Note that IAF MD1 6.1.3.3 includes a second additional survellance audit, which is not currently required by SQF or USDA Group GAP or practically any other multisite certification other than GLOBALG.A.P. While this change would level the playing field, referring to IAF MD1 for this seciton without naming having surveillance audits (during the cycle) will create industry confusion and perhaps pushback. Also the .6 multiplier is higher than the GG .5 multiplier.	Opportunity Identified
CPO 11	Part II	6.24	Site audit sampling	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.	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 MD1	please provide the specific IAF MD1 section/subsection.	Opportunity Identified
CPO 11	Part II	6.25	Management of non-conformities	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.	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	please provide the specific IAF MD1 section/subsection.	Opportunity Identified
CPO 11	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.	This strategy does not support food safety. The term high risk is controversial, and the labeling by GFSI further alienates these producers. Multisite certification is very effective, including internal controls, that in my expereince, have been better at company buy-in for food safety culture. Excluding these groups from multisite and forcing single site certification is harmful to the GFSI brand, limiting market access.	Couldn't reach consensus
CPO 11	Part II	6.29	Site audit sampling	The sampling programme shall be determined so that all members within the group or multi-site organisation are audited within a defined period, based on the risk of the commodity, for example 3-5 years.		3-5 years is not realistic, if you give a number, it will be assumed that that is the min-max. However GG uses 10 years, but this has been accepted. Keep in mind that the average group is 60-80 operations.	Opportunity Identified
CPO 11	Part II	6.32	Certificates	If the multi-site organisation is allowed to sell their product outside of the group or multi-site organisation, in all cases the member sites shall be transparent about the source and scope of certification, by providing customers with a copy of the certificate as issued above.	Certificate to include detailed description of the scope as it relates to the inclusion of Head Office or not.	This should be better controlled, if allowed. Such as defining who is responsible if the outside seller sold the product?	Couldn't reach consensus
CPO 11	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	Some are 5-8 sites. 20 does not make sense.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 11	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	ok	Opportunity Identified
CPO 11	Part III FSMS	5.2	Hygienic Design Management System	A Hygienic Design Management System shall be established, implemented, maintained and continuously improved.		This needs to be in the glossary.	Couldn't reach consensus
CPO 11	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	established or comprehensive.	Couldn't reach consensus
CPO 11	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	the red text is not necessary.	Agree
CPO 11	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	this is going to be impractical or exclude from farm level or exclude when operation has only 1 product. There are limited cases where this is valuable.	Opportunity Identified
CPO 11	Part III FSMS	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.	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 - add intended consumption as well?	You cannot contol the consumer	Couldn't reach consensus
CPO 11	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	if this is needed, consider that this will likely be a visual assessment by the line operator or the end packer, and that an introduction of a policy/another checkmark will not be beneficial. Consider adding this to a pre-operational check instead	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 11	Part III FSMS	19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		it's still unclear then if swabbing is required. If it is risk-based, then presumably operations can risk assess out. Is that the intention? If so keep as is.	Opportunity Identified
CPO 11	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	this is overburdensome for small operations. Maybe void for primary production?	Couldn't reach consensus
CPO 11	Part III GAP	3.1	Location, design and layout	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning, disinfection and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	disinfection is going to be a reach. Disagree with this add. (agree with the idea, but not realistic to farming operations)	Couldn't reach consensus
CPO 11	Part III GAP	3.3	Location, design and layout	The site facility shall be fenced and the entry points controlled by lockable gates.		assuming this is for livestock…	Opportunity Identified
CPO 11	Part III GAP	3.4	Location, design and layout	Entry and exit points to the site shall be equipped for cleaning and disinfecting of vehicle wheels.		assuming this is for livestock…	Opportunity Identified
CPO 11	Part III GAP	3.5	Location, design and layout	Entry annex points of the buildings structures shall be equipped with cleaning materials and footwear disinfectant.		assuming this is for livestock…	Opportunity Identified
CPO 11	Part III GAP	3.6	Location, design and layout	Vessels shall be designed and constructed to ensure that all catch landing areas facilitate proper cleaning and are free from potential contaminants such as oils, grease, fuels and cleaning chemicals.		assuming this is for livestock…	Opportunity Identified
CPO 11	Part III GAP	3.7	Location, design and layout	Adequate drainage and waste disposal systems and facilities shall be provided.		assuming this is for livestock…	Opportunity Identified
CPO 11	Part III GAP	4.5	Prevention of cross-contamination	There shall be a provision for handling product that has dropped to the ground.		really confusing format to have livestock and plants in the same PC document tab.	Opportunity Identified
CPO 11	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.	this seems like a reach from hygeine to health. While I agree with the principle note the pushback from primary production to include "social" practices	Agree
CPO 11	Part III 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, equipment and post-harvest washing, with appropriate facilities for its storage and distribution.	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.	good add	Agree
CPO 11	Part III GAP	11.4	Water quality	Based on risk assessment, water shall be tested for microbial and chemical contaminants. Frequency of testing shall depend on the water source and the risks of environmental contamination including intermittent or temporary contamination (e.g. heavy rain, flooding etc.).		add recirculating into the e.g.,	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 11	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Also if so, this is moving into env. sus.	Couldn't reach consensus
CPO 11	Part III GAP	11.5	Water quality	If agricultural water is stored, tanks, containers or cisterns shall not be a source of contamination for water or product.			Couldn't reach consensus
CPO 11	Part III GAP	14.4	Input - Agricultural chemicals	Residues of agricultural chemicals shall not exceed levels as established by applicable legislation (in both countries of production and intended sale), or by the Codex Alimentarius Commission.			Opportunity Identified
CPO 11	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	these should be different points.	Couldn't reach consensus
CPO 12	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	The CPO should have the commitment of two CBs within the benchmarked program. This demonstrates the industry need for the program and allows the CPO to have the right programs in place to govern their scheme. Allowing one CB does not allow for healthy competition and the reliability of one CB may compromise the integrity of the program from a fiscal and compliance perspective.	Agree
CPO 12	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	We do not support the additional language to this requirement. Listed examples are often interpreted as the "must haves" vs examples. Recommend to delete the reference to the examples. Depending on the interpretation, the examples listed may or may not impact the quality of the delivery of the GFSI recognized certification program and could be interpreted as absolutes.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	As stated in line 9 of this consultation: We agree with WG comments for removing the 10 certificate requirement for CPOs that have existing benchmarking status. The transition from one benchmarking requirement to the other creates confusion in the marketplace. CPOs are evaluated multiple times a year to the benchmarking requirements to demonstrate adherence to the GFSI program requirements. To encourage consistency and continuous improvement, we suggest a change to benchmarking application process for recognized CPOs to include a GFSI continued recognition assessment for existing GFSI recognized programs. These continued recognition assessments would cover part II and part III of the benchmarking requirements. Continued recognition would allow the CPO and the CB to implement the required change and sites would have the confidence in a continued recognized certificate eliminating duplicative audits.	Opportunity Identified
CPO 12	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	Do not agree with WG comment - an ongoing investigation is not grounds to put benchmarking on hold. The statement is subjective and provides open interpretation. Examples of the types of investigations would need to be defined and timeframe of when the CPO could re-apply is needed.	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Agree with WG comments for removing the 10 certificate requirement for CPOs that have existing benchmarking status. The transition from one benchmarking requirement to the other creates confusion in the marketplace. CPOs are evaluated multiple times a year to the benchmarking requirements to demonstrate adherence to the GFSI program requirements. To encourage consistency and continuous improvement, we suggest a change to benchmarking application process for recognized CPOs to include a GFSI continued recognition assessment for existing GFSI recognized programs. These continued recognition assessments would cover part II and part III of the benchmarking requirements. Continued recognition would allow the CPO and the CB to implement the required change and sites would have the confidence in a continued recognized certificate eliminating duplicative audits.	Agree
CPO 12	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	We agree with the comments from the working group as the industry scopes align with ISO 22003.	Agree
CPO 12	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		Please reconsider this requirement and eliminate the need for the full application process for currently recognized CPOs. Changes should be identified by the CPO, and the evaluation of the CPOs program can undergo review during the CPOs desktop review and onsite assessment. Please refer to line 9 additional comments and support.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.	As previously stated, we support the working groups comments to differentiate the application process for those CPOs that are recognized vs those that are seeking new recognition. Comments for this are outlined in line 9 of this section. Continued recognition is needed to prevent additional audits from occurring. This continued recognition should fully apply, even if the scope of recognition expands to other industry scopes. This would encourage existing CPOs to develop new programs to support the benchmarking requirements created for all the GFSI industry scopes.	Opportunity Identified
CPO 12	Part I	4	Methodology	Benchmark Leader	GFSI Benchmark Leader	Requirements for the benchmark leader should include a conflict of interest requirement and allow the CPO to deny a benchmarking leader. Definition should align with ISO principles as defined and be at least 2 years.	Couldn't reach consensus
CPO 12	Part I	4	Methodology	GFSI Executive Director	GFSI Director	Please consider the following language: GFSI may reassign the benchmarking leader with proper cause and justification. Sufficient notification to the CPO should be provided and there shouldn't be any negative impact to the recognized program.	Couldn't reach consensus
CPO 12	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Suggest their timeframe be changes to 12 months to allow for effective change management and implementation at CPO, AB CB, and site level. A nine month implementation timeline does not allow for the CPO to build, implement, communicate changes, and train to the new program requirements. A 12 month timeframe would provide the sites with the ability to understand the changes and implement proper change management protocol. This would also allow the CPOs and CBs to train auditors and CB personnel to the new requirements.	Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Corrective action planning is the appropriate terminology. Preventative actions is not appropriate at CPO level. The timeframe for submitting corrective action should be defined and agreed upon by the CPO and the benchmarking leader and be at a minimum of 30 days. Currently there is a 14 day turnaround time for submitting corrective action which isn't feasible in some circumstances.	Agree
CPO 12	Part I	5	Key procedural steps	A => Application		Consider adding the following language to this requirement: In the year prior to publication of a new version of the GFSI benchmarking requirements, no new application will be accepted. A notice will be displayed on the GFSI website to indicate the starting date of this one-year period, and existing GFSI recognized CPOs will be informed in writing/via email	Opportunity Identified
CPO 12	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Board decision and communicating to the CPO, e.g. 2 weeks.	Couldn't reach consensus
CPO 12	Part I	5	Key procedural steps	E => Stakeholder consultation			Couldn't reach consensus
CPO 12	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Please see comments regarding the GFSI appeals procedure and the appeals committee in line 56. The GFSI Director is not an impartial individual and there should be an impartial person managing this process.	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Agree that the appeals committee should be independent of the GFSI director and Steering Committee. Industry representatives shall be relevant to the industry and have knowledge of the process and the benchmarking requirements. Examples of participants should include: AB, CB, CPO, site(relevant to the appeal), auditor, academic, retailer, The appeals committee should have a list of multiple representatives and if needed, a relevant group of individuals be selected.	Agree
CPO 12	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		As written, this does not allow for corrective action to be submitted if evidence of non-alignment against the GFSI Benchmarking Requirement is found. Next steps are needed or further definition as to when non-alignment is evident. Sanction process should be transparent including the escalation process including what would initiate a sanction and the timelines involved. A definition is needed for non-alignment as its not in current glossary; CPO - Non conformance response GFSI - CAP review GFSI - CAP feedback or acceptance CPO - Final CAP response GFSI - Assessment (communication to CPO at least 7 days prior to Non-Alignment communication) GFSI - Non-Alignment Communication	Couldn't reach consensus
CPO 12	Part I	6	Sanctioning	This recommendation is passed to the GFSI Executive Director and the GFSI Board for final decision. The GFSI Technical Manager will inform the Certification Programme Owner of this final decision, including a full explanation for it.		Change reference from GFSI Board to GFSI Steering Committee.	Agree
CPO 12	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time for stakeholder communication plan, prior to the suspension being published on the GFSI website	Opportunity Identified
CPO 12	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		The CPO shall be informed in writing in the case of withdrawal, prior to the withdrawal being published on the GFSI website	Agree
CPO 12	Part I	6	Sanctioning	The Certification Programme Owner has the right to appeal against any decision made by the GFSI Board, the GFSI Executive Director or any person contracted to GFSI in relation to the Benchmarking Process.		Change reference from GFSI Board to GFSI Steering Committee.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	We support the idea of continued recognition since the CPO undergoes multiple desktop reviews and an annual onsite assessment.	Opportunity Identified
CPO 12	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.		Ownership definition needs to be aligned with Part 1	Couldn't reach consensus
CPO 12	Part II	1.3	Ownership	The Certification Programme Owner shall neither have conformity assessment nor certification activities for the Certification Programme. In particular, the Certification Programme shall not be developed, managed or owned by a Certification Body or group of Certification Bodies.		CBs are a valuable asset to the development of the program and should be considered a stakeholder in the CPOs development process. There seems to be some confusion on the CBs role in the development process. Clarify that the CBs can participate in the developing process but can't be a scheme owner.	Agree
CPO 12	Part II	1.11	Certification Programme Development and Maintenance	The consultation period shall allow sufficient time for stakeholders to review the Certification Programme under development and send their comments to the Certification Programme Owner.		As defined in Part I, Methodology 4, the interested parties in the process including the CPOs, CBs, sites, and ABs, have only nine months to develop, implement, certify and accredit the program requirements, including the public consultation period. The nine month publication timeframe does not support this clause allowing for sufficient time for public consultation.	Opportunity Identified
CPO 12	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.		NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011. Remove this last part as it is not possible for the CPO to determine adherence to this requirement.	Agree
CPO 12	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		The reference to "current version" is problematic. There needs to be an implementation period of up to 18 months for all reference for the current version of the IAF MD4, IAF MD1, Codex, etc.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		This requirement is currently assessed at the CB by the Accreditation Body. Recommend accepting the results of this competent body and allow the CPO to apply their resources to higher risk requirements.	Couldn't reach consensus
CPO 12	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Considering removing "at all times" or reword to "upon request."	Couldn't reach consensus
CPO 12	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Do not support the working groups additional wording and examples. Definition of a "serious food safety situation" is needed. Clarification on GFSI's expectations and defining what GFSI wants to do with this information should be identified. The reporting process needs to be defined including a process, timeline, and required information to be shared. This is confidential information but documents are sent to a general GFSI email. Please clarify the confidentiality of this information that is being shared.	Opportunity Identified
CPO 12	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		Remove product recalls and complaints from the list of risk factors as recalls by a site is not a metric linked to the performance of a CB. KPIS should be focused on how the CB reacts vs the quantity of such measurements.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	WG comment is unclear as it seems to relate to monitoring of the CPO, which does not align with 3.14. Any public posting would breach company policy with possible legal ramifications. KPIs are goals and ideas designed to promote continuous improvement and improve the overall performance of the program. The goal is to work in collaboration with our CB partners to identify program improvements so that we are all achieving at a higher level. Posting this information does not encourage continuous improvement. Recommend removing specific KPIs to read. "The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	Couldn't reach consensus
CPO 12	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		This information is assessed during the CB assessment by the AB. This is duplicate work. The idea behind GFSI is to have trust in the process which means we should acknowledge all the work of the checkers checking the system.	Couldn't reach consensus
CPO 12	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		This information is assessed during the CB assessment by the AB. This is duplicate work. The idea behind GFSI is to have trust in the process which means we should acknowledge all the work of the checkers checking the system.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	The examples listed in this requirement are being interpreted as must haves. Recommend removing examples and allow the CB to monitor the auditor's soft skills.	Opportunity Identified
CPO 12	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	Do not agree with proposed changes. The evaluation of an auditor should be risk based as there are many auditors that do not require continuous monitoring and others that do. The time and effort should be focused on problematic auditors. This allows all responsible parties to dedicate resources to improve the process.	Opportunity Identified
CPO 12	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree with the working groups comment to remove the emphasis on the specific education requirement. Education can be included in the auditor qualifications however, the years of industry and auditing experience, in addition to continuing education courses should be granted more value.	Opportunity Identified
CPO 12	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Unable to comment since the GFSI Auditor Training and Professional Development framework has not been posted.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 12	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Auditors that were previously qualified, are being challenged with their level of competence against the current GFSI requirements. It is important to recognize that as the requirements evolve, we need to ensure that auditors previously credentialed are recognized. It is expected that all auditors are checked to ensure their qualifications meet the requirements linked to the benchmarking standard at the time of the original acceptance date. Many of the CPOs, CBs and PRBs have data retention policies that don't exceed 5 years. Rather than understanding if a long standing auditor (>5 years) meets existing requirements, the focus should be on the performance of the auditor. Please consider recognizing alternative forms of HACCP training specifically the Food Safety Preventive Controls Alliance (FSPCA) training. The FSPCA has reworked their current training program to include the same proven principles and application guidelines that are used within CODEX General Principles of Food Hygiene CXC 1-1969 (2023). The FSPCA Preventive Controls for Human Food curriculum is an extensive training program that incorporates the HACCP principles while emphasizing specific	Opportunity Identified
CPO 12	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Allow for the recognition of other recognized GFSI CPO witness audits. Consider a risk based approach to determine witness audits.	Opportunity Identified
CPO 12	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	Allow the CPO to define procedure and requirements for scope extensions. Remove the requirement for prescribed training and supervised audits that follow the requirements in 4.10.	Opportunity Identified
CPO 12	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Do not agree with change. This is more prescription. The site could have over 100 countries that are involved in the export process. How is the auditor to know the relevant laws of the country of the sale of goods. The intent of the site requirement is for the auditor to ensure the site has the means to assess the regulatory requirements in the country of manufacture and sale of goods.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Agree that it be to any relevant GFSI recognized certification program. Recommend that the total annual audits to be 3 against the relevant GFSI CPO.	Couldn't reach consensus
CPO 12	Part II	4.15	Maintenance of Auditor Skills and Competence	In specific situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.		If 4.14 is accepted. 4.15 is not needed.	Opportunity Identified
CPO 12	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Having a "type" of non-conformity is not a requirement. Change to where the integrity of the certification could be at risk	Couldn't reach consensus
CPO 12	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree to remove unannounced audit for primary production. This is needed to protect the safety of the crop, animal, and the auditor. Please see recommended definition of Unannounced audit in the glossary.	Opportunity Identified
CPO 12	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Change is not needed. Recommend that it continues to read audit reports. This ensures that confidentiality applies to all types of audit reports.	Couldn't reach consensus
CPO 12	Part II	5.19	Audit Reporting	The Certification Programme Owner shall ensure that necessary agreements are in place with the audited organisations and the Certification Bodies so that the audit records are available on request to the Certification Programme Owner and to GFSI.		This is confidential information but documents are sent to a general GFSI email address (gfsibm@theconsumergoodsforum.com) . This should be addressed, also to manage GDPR requirements. Information should only be sent to known recipients.	Misunderstood
CPO 12	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Do not support the additional language and comment by the working group. This adds complexity to the process since the certificate is issued by the certification body. If GFSI is moving forward with an e-solution, this is not needed.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	This should also be applied to the reviews conducted by the Benchmarking leader. An agreed timeframe to closeout findings should be identified and at a minimum be 30 days to respond to findings.	Couldn't reach consensus
CPO 12	Part II	5.27	Management of Certification	The Certification Programme Owner shall define minimum requirements for Certification Bodies considerations when organisations switch between GFSI-recognised Certification Programmes. This should include but not be limited to an evaluation of the organisation's audit history, last unannounced audit, etc.		GFSI recognized programmes do not all operate under the same accreditation norms, and therefore checking audit history and unannounced audits is not practical. Change last part of requirement as follows: This shall include a confirmation that the certification is still valid at the time of switching.	Couldn't reach consensus
CPO 12	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Everything is available to public and significant regulatory food safety non-conformities are subjective. Considering the intent of the proposed change, rephrase to read, "any significant food safety incidents requiring public notification, such as significant regulatory warnings, product recalls, etc. The phrase emphasizes that notification is required to protect public health.	Opportunity Identified
CPO 12	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	Disagree with added language since there is no percentage identified. Eliminate reference to the percent and require justified reasoning.	Couldn't reach consensus
CPO 12	Part II	6.24	Site audit sampling	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.	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 MD1	Changes to an external reference cannot be instantly incorporated into a standard. There needs to be allowed a transition time (in alignment with the CPO's current version update cycle) from when the update is made to when it is incorporated into the standard. This comment would render all the CPO's standards out of compliance. This allows for public consultation and other requirements in support of the GFSI requirements.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part II	6.27	Management of non-conformities	If the central function, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including the central function and all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.	Define "critical Certification Programme requirements" or suggest to replace by "leading to major non conformities". Some members suggested " fundamental certification programme requirements".	Change to: fails to meet the certification programme requirements (including not addressing any NCs raised within the defined timelines)	Couldn't reach consensus
CPO 12	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	The certificate shall only be issued to the multi-site organization, not individual sites, as this is in contradiction to the accreditation requirements. In terms of a multi-site - the central function is responsible and HO terminology should not be introduced here.	Agree
CPO 12	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	20 is aligned with ISO 22003, so do not change as it will lead to inconsistency with an international approach	Opportunity Identified
CPO 12	Part II	6.34	General requirements	A Certification Programme shall certify each Tier 1 facility site of a company's distribution and / or warehouse operations with each T1 site having its own single certificate. However, a multi-site approach may be used to include all T2 or below (e.g. T3) satellite sites linked to the T1 organisations' certification.		Align the sampling approach with ISO 22003, and apply to FCC E, F & G	Couldn't reach consensus
CPO 12	Part II	6.35	General requirements	All sites within a multi-site sampling programme shall be operating under the same storage conditions (e.g. ambient stable, refrigerated, frozen or combinations of these) and have the same risk profile (e.g. size of site, shift patterns, management structure and employee numbers). Therefore, it is recognised that an organisation could have several multi-site sampling programmes based on different process and risk profile, but these programmes shall be clearly defined and documented.		Align the sampling approach with ISO 22003, and apply to FCC E, F & G	Couldn't reach consensus
CPO 12	Part II	6.36	Site audit sampling	The sample size shall meet the requirements defined in the table 2.		Align the sampling approach with ISO 22003, and apply to FCC E, F & G	Couldn't reach consensus
CPO 12	Part III FSMS	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.		It is not clear in this section which scopes (FCC- food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements and resubmitted for commenting	Couldn't reach consensus
CPO 12	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	The reference to "current version" is problematic. There needs to be an implementation period of up to 18 months for all reference for the current version of the IAF MD4, IAF MD1, Codex, etc.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III FSMS	3	Management review	The senior management shall review all elements of the Food Safety Management System, including 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.		We suggest to include the following changes to this requirement: The senior management shall review all elements of the Food Safety Management System, including the Food Safety Culture, the Hazard and Risk Management System, HACCP plan or HACCP plans regularly, and in case of any change that impacts food safety, to ensure their continuing suitability and effectiveness.	Opportunity Identified
CPO 12	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Disagree with proposed language. The reference to CXC 1-1969 uses SHOULD not SHALL. Where microbiological, physical, chemical and allergen specifications are used for food safety or suitability, such specifications should be based on sound scientific principles and state, where appropriate, sampling parameters, analytical methods, acceptable limits, and monitoring procedures. The use of scientific principles isn't defined and would lead to a variety of applications. Suggest the following rewording: 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. Specifications should be based on sound scientific principles.	Couldn’t reach consensus
CPO 12	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	The recommend language is not clear on it's intent. Emergency procurement of materials may not follow the documented procedure for supplier approval. Recommend keeping original language as it is clear in it's intent and designed to maintain food safety at the site.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	The elements title for 16.1 appears to be incorrect. The use of the phrase, "where possible" is very subjective from an auditing perspective. The risk assessment would determine where control measures can be applied.	Opportunity Identified
CPO 12	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Agree to the additional requirement however, validation would also need to include verification. The requirement would not apply to primary scopes. A1, A2, B1, B2, B3	Opportunity Identified
CPO 12	Part III FSMS	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.	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 - add intended consumption as well?	Disagree with WG member amendment - - a food manufacture rarely knows where its customers will sell their products - they only have visibility of where they are selling it. However the manufacturer has a responsibility to ensure accurate labelling so the customer has all the necessary information (e.g. cooking instructions) to use the product correctly/consume the product safely. include reference to "intended" use instead of sale?	Couldn't reach consensus
CPO 12	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	We agree in concept however, this requirement should be directed to label control vs packaging.	Opportunity Identified
CPO 12	Part III FSMS	18	Printed material control	Procedures shall be established, implemented and maintained to manage packaging materials printed with product ingredient list(s), allergens, identification code and other critical information and prevent mis-printing.		Element number is missing the last digit	Opportunity Identified
CPO 12	Part III FSMS	19.1	Testing	A procedure shall be established, implemented and maintained to ensure that analyses of food parameters critical to food safety are undertaken by competent laboratories and using appropriate sampling and testing methods and that such analyses are performed in accordance with the applicable requirements of ISO/IEC 17025.		Suggest to remove 17025 and apply the GFSI definition of competent laboratory. Challenge is that for some laboratories, such as government laboratories, 17025 is not able to be verified.	Couldn't reach consensus
CPO 12	Part III FSMS	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.		Requirement seems to be split - row 79 on product recall - then remove reference to withdrawal in this line, as it is included in row 80	Misunderstood
CPO 12	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	Change management concepts should be applied however, a documented program would be very subjective to interpretation. Changes to the food safety program are already required as part of the food safety plan maintenance process.	Couldn't reach consensus
CPO 12	Part III FSMS	1.2	Management responsibility	A clear organisational structure identifying the job functions and responsibilities of at least those employees whose activities affect Hygienic Design shall be established, implemented and maintained.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III FSMS	2.2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Hygienic Design Management System shall be provided.			Opportunity Identified
CPO 12	Part III FSMS	3.2	Management review	The organisation's senior management shall review the verification of the Hygienic Design System at planned intervals, to ensure their continuing suitability, adequacy and effectiveness.			Opportunity Identified
CPO 12	Part III FSMS	4.1	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation (both countries of production and intended sale).			Opportunity Identified
CPO 12	Part III FSMS	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).			Opportunity Identified
CPO 12	Part III FSMS	4.3	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation.			Opportunity Identified
CPO 12	Part III FSMS	4.4	Legislation	Procedures shall be established, implemented and maintained to ensure that buildings and equipment are legally compliant in the hygienic design requirements in the country of known implementation / sale.			Opportunity Identified
CPO 12	Part III FSMS	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.			Opportunity Identified
CPO 12	Part III FSMS	5.2	Hygienic Design Management System	A Hygienic Design Management System shall be established, implemented, maintained and continuously improved.			Opportunity Identified
CPO 12	Part III FSMS	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.			Agree
CPO 12	Part III FSMS	6.2	Hygienic Design Policy	A clear, concise and documented Hygienic Design policy statement shall be in place, as well as measurable objectives specifying the organisation's commitments to meet the food safety needs of its products			Opportunity Identified
CPO 12	Part III FSMS	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.			Opportunity Identified
CPO 12	Part III FSMS	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.			Opportunity Identified
CPO 12	Part III FSMS	7.2	Food defence	A documented food defence plan shall be in place specifying the measures implemented to mitigate the public health risks from any identified food defence threats.			Opportunity Identified
CPO 12	Part III FSMS	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.			Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 12	Part III FSMS	7.3	Food defence	This food defence plan shall be supported by the Food Safety Management System.			Opportunity Identified
CPO 12	Part III FSMS	7.3.1	Food defence	The agent / broker shall ensure that their suppliers' food defence plan is supported by the suppliers' Food Safety Management System.			Opportunity Identified
CPO 12	Part III FSMS	8.1	Food fraud	A food fraud vulnerability assessment procedure shall be established, implemented and maintained to identify potential vulnerability and prioritise food fraud mitigation measures.			Opportunity Identified
CPO 12	Part III FSMS	8.2	Food fraud	A documented food fraud plan shall be in place specifying the measures implemented to mitigate the public health risks from the identified food fraud vulnerabilities.			Opportunity Identified
CPO 12	Part III FSMS	8.3	Food fraud	This food fraud mitigation plan shall be supported by the organisation's Food Safety Management System.			Opportunity Identified
CPO 12	Part III FSMS	8.4	Food fraud	The agent / broker shall ensure that their suppliers comply to key elements FSM 8.1, 8.2, 8.3			Opportunity Identified
CPO 12	Part III FSMS	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.			Opportunity Identified
CPO 12	Part III FSMS	9.1.2	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 Hygienic Design Management System.			Opportunity Identified
CPO 12	Part III FSMS	9.2.1	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the food if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.			Opportunity Identified
CPO 12	Part III FSMS	9.2.2	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the feed if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.			Opportunity Identified
CPO 12	Part III FSMS	9.2.3	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the packaging if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.			Opportunity Identified
CPO 12	Part III FSMS	9.2.4	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the lifetime of buildings/equipment if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III FSMS	10.2	Specified requirements / Specifications	A review process of the specified requirements or specifications shall be in place.			Opportunity Identified
CPO 12	Part III FSMS	10.3	Specified requirements / Specifications	The Food Safety Management System shall ensure that packaging used to impart or provide a functional effect on the safety of the food to be packed in this packaging, such as shelf life extension shall, where known, be effective within its own specified criteria.			Opportunity Identified
CPO 12	Part III FSMS	10.4	Specified requirements / Specifications	There shall be sufficient data to ensure food contact with the packaging is safe, and sufficient documentation of claims, according to the intended use, where recycled material, plant based material or functional additives are used.			Opportunity Identified
CPO 12	Part III FSMS	11	Procedures	Procedures and instructions shall be established, implemented and maintained for all processes and operations having an effect on food safety.			Agree
CPO 12	Part III FSMS	12	Resource management	The resources needed to establish, implement, maintain, review and improve the Food Safety Management System shall be identified and assigned.			Opportunity Identified
CPO 12	Part III FSMS	12.2	Resource management	The resources needed to establish, implement, maintain, review and improve the Hygienic Design Management System shall be identified and assigned.			Opportunity Identified
CPO 12	Part III FSMS	13.1.1	Purchasing and supplier performance	Purchasing processes shall be controlled to ensure 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.			Opportunity Identified
CPO 12	Part III FSMS	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.			Opportunity Identified
CPO 12	Part III FSMS	13.1.3	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 regulatory requirements.			Opportunity Identified
CPO 12	Part III FSMS	13.1.4	Purchasing and supplier performance	A procedure shall be established, implemented and maintained to ensure that the newly purchased building/equipment meets the hygienic design specification.			Opportunity Identified
CPO 12	Part III FSMS	13.2.2	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 feed still conforms to the specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III FSMS	13.2.3	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 packaging still conforms to the specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded.			Opportunity Identified
CPO 12	Part III FSMS	13.2.4	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 buildings/equipment 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.			Opportunity Identified
CPO 12	Part III FSMS	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.			Opportunity Identified
CPO 12	Part III FSMS	13.3.2	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 Hygienic Design Management System.			Opportunity Identified
CPO 12	Part III FSMS	13.4	Purchasing and supplier performance	Specific procedures shall be in place for the procurement of animals, fish and seafood which are subject to control of prohibited substances (e.g. pharmaceuticals, veterinary medicines, heavy metals and pesticides).			Opportunity Identified
CPO 12	Part III FSMS	13.5	Purchasing and supplier performance	Specific provisions shall be in place for the procurement of feed from approved, certified sources.			Opportunity Identified
CPO 12	Part III FSMS	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).			Opportunity Identified
CPO 12	Part III FSMS	14.1.2	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 feed (minimum one step forward).			Opportunity Identified
CPO 12	Part III FSMS	14.1.3	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 packaging (minimum one step forward).			Opportunity Identified
CPO 12	Part III FSMS	14.1.4	Traceability	Specifically, procedures and systems shall be established, implemented and maintained to ensure identification of input feed and feed additives, including, as a minimum, the name and address of the producer, lot or batch number. Specifically, procedures and systems shall be established, implemented and maintained to ensure identification of any veterinary medication purchases and treatment.			Opportunity Identified
CPO 12	Part III FSMS	14.1.5	Traceability	Procedures shall be established, implemented and maintained to ensure the ability to trace or follow a material or article critical to food safety through all stages of purchase, construction and distribution (minimum one step forward and one step backward).			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III FSMS	14.2	Traceability	Documented tests of the traceability system shall be undertaken to ensure this is operating effectively.			Opportunity Identified
CPO 12	Part III FSMS	14.3	Traceability	Appropriate procedures and systems shall be established, implemented and maintained to ensure the traceability of all edible parts of the carcass is maintained until the carcass is deemed fit for human consumption which includes blood for human consumption.			Opportunity Identified
CPO 12	Part III FSMS	14.4	Traceability	Livestock and the records associated with that livestock that has been treated with veterinary medicines and are within the manufacturer's recommended waiting period for that course of treatment shall be clearly identified.			Opportunity Identified
CPO 12	Part III FSMS	14.5	Traceability	Specific policies shall be in place for the procurement of approved veterinary medicines.			Opportunity Identified
CPO 12	Part III FSMS	15	Product development	Product design and development procedure shall be established, implemented and maintained for new products and changes to product or manufacturing processes to ensure safe and legal products are produced.			Opportunity Identified
CPO 12	Part III FSMS	16.2	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.	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.		Opportunity Identified
CPO 12	Part III FSMS	17.1	Control of measuring and monitoring equipment / devices	The equipment / devices used to measure parameters critical to ensure food safety shall be identified.			Opportunity Identified
CPO 12	Part III FSMS	17.2	Control of measuring and monitoring equipment / devices	The identified equipment / devices shall be regularly calibrated; calibration shall be traceable to a national or international standard or method.			Opportunity Identified
CPO 12	Part III FSMS	18.1.2	Product labelling and product information	Finished product shall be labelled to ensure safe use of feed, in compliance with the applicable food safety legislation in the country of intended sale.			Opportunity Identified
CPO 12	Part III FSMS	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.			Opportunity Identified
CPO 12	Part III FSMS	19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.			Opportunity Identified
CPO 12	Part III FSMS	19.3	Environmental monitoring	A risk-based approach shall be in place to define the environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.			Opportunity Identified
CPO 12	Part III FSMS	19.4	Testing	Where external testing of construction materials, buildings or equipment is required, it shall be carried out by an accredited testing facility or one that follows relevant international testing guidelines.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III FSMS	19.5	Testing	Where in-house testing is carried out, calibration of equipment that is critical to food safety shall be carried out against national standards or other accurate means.			Opportunity Identified
CPO 12	Part III FSMS	20	Internal audit	An internal audit procedure shall be established, implemented and maintained; it shall cover all elements of the Food Safety Management System.			Opportunity Identified
CPO 12	Part III FSMS	20.2	Internal audit	An internal audit procedure shall be established, implemented and maintained; it shall cover all elements of the Hygienic Design Management System.			Couldn't reach consensus
CPO 12	Part III FSMS	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.			Couldn't reach consensus
CPO 12	Part III FSMS	22.2	Serious incident management	In case of any livestock found to be infected with a notifiable disease, parasite or condition that would compromise food safety, measures for the containment and quarantine shall be established and implemented.			Opportunity Identified
CPO 12	Part III FSMS	22.3	Serious incident management	Measures for the withdrawals and containment of contaminated feedstuff shall be established and implemented.			Opportunity Identified
CPO 12	Part III FSMS	22.4	Serious incident management	An incident management procedure, including product recall, withdrawal, and retrofit shall be established, implemented and maintained. The recall procedure shall be regularly tested for effectiveness.			Opportunity Identified
CPO 12	Part III FSMS	23	Product release	A product release procedure shall be established, implemented and maintained.			Opportunity Identified
CPO 12	Part III FSMS	23.2	Product release	Commissioning or building/equipment release procedures shall be established, implemented and maintained.			Opportunity Identified
CPO 12	Part III FSMS	23.3	Product release	Hygienic design construction specifications shall be verified for buildings and equipment prior to dispatch or hand-over to the customer.			Opportunity Identified
CPO 12	Part III FSMS	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.			Opportunity Identified
CPO 12	Part III FSMS	24.2	Control of non-conformity	This procedure shall include provisions for food that is found to be damaged and / or returned from customers.			Opportunity Identified
CPO 12	Part III FSMS	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.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III FSMS	26	Change Management	Change control shall be undertaken and documented to evaluate the impacts of any changes/ modifications on equipment/building hygienic design.	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.		Opportunity Identified
CPO 12	Part III GAP	1	Land used for production	Land used for production shall be evaluated for hazards and contamination. Control measures shall be implemented to reduce hazards to acceptable levels.		General Comment: It is not clear in this section which scopes (food chain categories) the element applies to. Although we attempted to identify the FCC, this needs to be clarified and clear for each element in Part III of the benchmarking requirements. Modified language to include production environment vs land used for production Production environment shall be evaluated for hazards and contamination. Control measures shall be implemented to reduce hazards to acceptable levels.	Couldn't reach consensus
CPO 12	Part III GAP	2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the production of safe products.			Opportunity Identified
CPO 12	Part III GAP	3.1	Location, design and layout	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning, disinfection and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	This requirement should not apply to the BI and BII scopes.	Opportunity Identified
CPO 12	Part III GAP	3.2	Location, design and layout	All buildings shall be marked to indicate that they contain livestock and that no entry to unauthorised persons is permitted.			Couldn't reach consensus
CPO 12	Part III GAP	3.3	Location, design and layout	The site facility shall be fenced and the entry points controlled by lockable gates.		There are some sites have controlled and effective access but might not be controlled by lockable gates. Recommend rewording, "The site facility shall be fenced and the entry points controlled. ~~by lockable gates.~~	Agree
CPO 12	Part III GAP	3.4	Location, design and layout	Entry and exit points to the site shall be equipped for cleaning and disinfecting of vehicle wheels.			Couldn't reach consensus
CPO 12	Part III GAP	3.5	Location, design and layout	Entry annex points of the buildings structures shall be equipped with cleaning materials and footwear disinfectant.			Couldn't reach consensus
CPO 12	Part III GAP	3.6	Location, design and layout	Vessels shall be designed and constructed to ensure that all catch landing areas facilitate proper cleaning and are free from potential contaminants such as oils, grease, fuels and cleaning chemicals.			Couldn't reach consensus
CPO 12	Part III GAP	3.7	Location, design and layout	Adequate drainage and waste disposal systems and facilities shall be provided.		Recommend the following change to clarify intent: Adequate drainage, waste ~~and~~ disposal systems, and facilities shall be provided to prevent field and facility cross contamination.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III 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 and silo seepage.		Recommend to remove for the B scopes. Unsure as to why the inclusion of 'Highways' is relevant and why animal waste and soli seepage is addressed under farming of plants? This requirement is contained in the animal scope, A1.	Opportunity Identified
CPO 12	Part III GAP	3.8.2	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.			Couldn't reach consensus
CPO 12	Part III GAP	4.1.1	Prevention of cross-contamination	Effective measures shall be taken during production, storage and transport to prevent cross-contamination of animals from agricultural inputs, cleaning agents, veterinary medicines or personnel who come directly or indirectly into contact with other sites, animals or agricultural products.			Opportunity Identified
CPO 12	Part III GAP	4.1.2	Prevention of cross-contamination	Effective measures shall be taken during production, storage and transport to prevent cross-contamination of produce from agricultural inputs, cleaning agents, veterinary medicines or personnel who come directly or indirectly into contact with other sites, animals or produce.			Opportunity Identified
CPO 12	Part III GAP	4.1.3	Prevention of cross-contamination	Effective measures shall be taken during production, storage and transport to prevent cross-contamination of grain and pulses from agricultural inputs, cleaning and sanitizing agents, veterinary medicines or personnel who come directly or indirectly into contact with other sites, animals or grain and pulses.			Opportunity Identified
CPO 12	Part III GAP	4.2.1	Prevention of cross-contamination	Livestock and products shall be stored, temporarily housed and transported under conditions which minimise the potential for microbial, chemical or physical contamination.			Opportunity Identified
CPO 12	Part III GAP	4.2.1	Prevention of cross-contamination	Livestock and aquaculture and fishery products shall be stored, temporarily housed and transported under conditions which minimise the potential for microbial, chemical or physical contamination.			Opportunity Identified
CPO 12	Part III GAP	4.3	Prevention of cross-contamination	Feed shall be stored securely and handled separately from waste liquids, untreated manure, hazardous substances, veterinary medication and cleaning chemicals.			Opportunity Identified
CPO 12	Part III GAP	4.4.1	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 microbial or chemical contamination			Opportunity Identified
CPO 12	Part III GAP	4.4.2	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 microbial or chemical contamination			Opportunity Identified
CPO 12	Part III GAP	4.5	Prevention of cross-contamination	There shall be a provision for handling product that has dropped to the ground.			Opportunity Identified
CPO 12	Part III GAP	5	Employee facilities	Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.		Recommend the following change: Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed, operated, maintained and cleaned to minimize food safety risks.	Agree
CPO 12	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.		Opportunity Identified
CPO 12	Part III GAP	6.2	Personnel health and hygiene	Suitable protective clothing shall be provided to minimise food safety risks.		Replace with the following: Procedures shall be in place for the provision and use of suitable protective clothing, which shall be provided based on risk and the impact on food safety.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III GAP	6.3.1	Personnel health and hygiene	People known or suspected to be suffering from or to be a carrier of a disease or illness likely to be transmitted through produce shall not be allowed to enter any food handling area. Any person so affected shall immediately report illness or symptoms of illness to the management.			Opportunity Identified
CPO 12	Part III GAP	6.3.2	Personnel health and hygiene	People known or suspected to be suffering from or to be a carrier of a disease or illness likely to be transmitted through grain and pulses shall not be allowed to enter any food handling area. Any person so affected shall immediately report illness or symptoms of illness to the management.			Opportunity Identified
CPO 12	Part III GAP	6.4	Personnel health and hygiene	The requirements of the personnel health and hygiene section shall apply to employees, contractors and visitors commensurate to their impact on food safety.			Opportunity Identified
CPO 12	Part III GAP	7.1	Personnel training	A system shall be established, implemented and maintained to ensure that all employees are trained, and retrained when necessary, to have an understanding in food safety commensurate with their activity.			Opportunity Identified
CPO 12	Part III GAP	7.2	Personnel training	Agricultural workers who apply agricultural chemicals shall be trained and qualified in the proper application procedures of such chemicals.			Opportunity Identified
CPO 12	Part III GAP	8.1	Housekeeping, cleaning and disinfection	An appropriate housekeeping, cleaning and disinfection programme shall be established, implemented, maintained and monitored. Its effectiveness in eliminating food safety risks shall be measured.			Opportunity Identified
CPO 12	Part III GAP	8.3	Housekeeping, cleaning and disinfection	Cleaning procedures shall be reflective of the type of capture and production system, its intensity and the animal species.			Opportunity Identified
CPO 12	Part III GAP	9	Site inspections / checks	A programme of site inspections / checks shall be established, implemented and maintained to ensure the site and equipment are maintained in a suitable condition to ensure food safety, as applicable to the activity of the site.		Recommend the following change: A programme of site inspections / checks shall be established, implemented and maintained to ensure that inspections/ checks are performed at a frequency based on risks and on any significant changes which might impact food safety; it shall cover ~~to ensure~~ the site and equipment, to ensure they are maintained in a suitable condition to ensure food safety, as applicable to the activity of the site.	Opportunity Identified
CPO 12	Part III 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, equipment and post-harvest washing, with appropriate facilities for its storage and distribution.	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.	Recommend the following change: Indoor primary production facilities shall maintain ~~a supply of a~~ water sources, storage and distribution systems ~~fit for its purpose and~~ that do not compromise food safety, for handwashing, equipment and post-harvest washing, with appropriate facilities for its storage and distribution. Procedures shall be in place to identify the ~~sources of water~~ sources, storage and delivery systems used on the farm (municipality, reused irrigation water, well, open canal, reservoir, rivers, lakes, farm ponds etc.) and to assess its suitability for the intended use.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III GAP	11.2.1	Water quality	Procedures shall be in place to identify the sources of water used on the farm (municipality, reused irrigation water, well, open canal, reservoir, rivers, lakes, farm ponds etc.) and to assess its suitability for the intended use		Recommend to modify to include reference to water quality of chemical application in GAP 14.6. Procedures shall be in place to identify the sources of water used on the farm (municipality, reused irrigation water, well, open canal, reservoir, rivers, lakes, farm ponds, etc.) and to assess its suitability for the intended use (irrigation, chemical Application, post-harvest washing, etc.).	Couldn't reach consensus
CPO 12	Part III GAP	11.2.2	Water quality	Procedures shall be in place to identify the sources of water used for aquaculture production activities (municipality, reused irrigation water, well, open canal, reservoir, rivers, lakes, farm ponds etc.) and to assess its suitability for the intended use			Opportunity Identified
CPO 12	Part III GAP	11.3	Water quality	Based on risk assessment, measures shall be in place to protect sources of agricultural waters from potential contamination, including corrective actions to minimise the risk of contamination (e.g., from livestock, sewage treatment, human habitation)			Opportunity Identified
CPO 12	Part III GAP	11.4	Water quality	Based on risk assessment, water shall be tested for microbial and chemical contaminants. Frequency of testing shall depend on the water source and the risks of environmental contamination including intermittent or temporary contamination (e.g. heavy rain, flooding etc.).			Opportunity Identified
CPO 12	Part III GAP	11.5	Water quality	If agricultural water is stored, tanks, containers or cisterns shall not be a source of contamination for water or product.		Recommend the following change: Based on risk assessment, measures shall be in place to protect water sources, storage and ~~delivery~~ distribution systems ~~of agricultural waters~~ from potential contamination, including corrective actions to minimize the risk of contamination (e.g., from livestock animals, sewage treatment, human habitation).	Couldn't reach consensus
CPO 12	Part III GAP	11.6	Water quality	Watershed water shall be tested for potential contaminants such as polychlorinated biphenyls (PCBs) and heavy metals based on a site risk assessment.			Opportunity Identified
CPO 12	Part III GAP	11.7	Water quality	Water containing veterinary medicines shall be clearly identified, suitably isolated/ managed and maintained.			Opportunity Identified
CPO 12	Part III GAP	12.1	Waste management	The collection, storage and disposal of waste material, including waste water and drainage when applicable, shall not represent any food safety risks.			Opportunity Identified
CPO 12	Part III GAP	12.2	Waste management - Waste water and slurry	Untreated waste water and slurry from sewage plants shall not be spread in areas that can be accessed by livestock, or used for the fertilisation of pasture land on which animal feed is growing.			Opportunity Identified
CPO 12	Part III GAP	12.3	Waste management - Waste water and slurry	Waste water and slurry from ponds shall be disposed of legally and in a manner that prevents contamination of land and water courses.			Opportunity Identified
CPO 12	Part III GAP	12.4	Waste management - veterinary waste	Suitable provisions shall be made for the storage and removal of veterinary clinical waste.			Opportunity Identified
CPO 12	Part III GAP	12.5	Waste management - veterinary waste	Veterinary medicines that have reached their expiry date shall be disposed of according to the manufacturer's instructions and in compliance with national legislation.			Opportunity Identified
CPO 12	Part III GAP	12.6.1	Waste management – dead animals	Suitable provisions shall be made for the collection, storage and removal of animal carcasses for disposal.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III GAP	12.6.2	Waste management – dead animals	Suitable provisions shall be made for the collection, storage and removal of dead fish for disposal.			Opportunity Identified
CPO 12	Part III GAP	12.7	Waste management – dead animals	Disposal companies shall not pass through the production facilities to remove carcasses. When this is not unavoidable, requirements detailed in GAP6.4 apply.			Opportunity Identified
CPO 12	Part III GAP	12.8	Waste management - manure	Farmyard manure shall be collected in a fixed location with suitable services fitted with a firm and tidewater impermeable ground slab. Poultry manure shall not be regarded as solid manure and shall be treated accordingly.			Opportunity Identified
CPO 12	Part III GAP	13	Pest control	When primary production is carried out in indoor establishments, the recommendations of the Codex Alimentarius Recommended International Codes of Practice – General Principles of Food Hygiene and product specific codes of Hygienic Practice shall be followed with respect to pest control.			Opportunity Identified
CPO 12	Part III GAP	13.2	Pest control	Based on risk assessment, operations shall assess potential contamination associated with wild and domestic animals.		Recommend the following change: Based on a risk assessment, and updated whenever there is a change affecting food safety, operations shall assess potential contamination associated with wild and domestic animals	Couldn't reach consensus
CPO 12	Part III GAP	14.1	Input - Manure, biosolids and other natural fertilisers	Proper treatment procedures (e.g. composting, pasteurisation, heat drying, UV irradiation, alkali digestion and sun drying management practices including appropriate delays between application of agricultural inputs and harvesting of the crop or combinations of these) shall be designed to reduce or eliminate pathogens in manure, biosolids and other natural fertilisers. As a minimum, the use of untreated biosolids shall be prohibited.			Opportunity Identified
CPO 12	Part III GAP	14.2	Input - Manure, biosolids and other natural fertilisers	Procedures shall be in place to ensure that the producer is required to take into consideration the World Health Organisation (WHO) guidelines on the safe use of waste water and livestock excreta in agriculture, as appropriate.			Opportunity Identified
CPO 12	Part III GAP	14.3	Input - Agricultural chemicals	Only agricultural chemicals which are authorised for the cultivation of the specific produce / grains and pulses shall be used. They shall be used according to the manufacturer's instructions, local legislations and for the intended purpose.			Opportunity Identified
CPO 12	Part III GAP	14.4	Input - Agricultural chemicals	Residues of agricultural chemicals shall not exceed levels as established by applicable legislation (in both countries of production and intended sale), or by the Codex Alimentarius Commission.			Opportunity Identified
CPO 12	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Recommend to delete the additional language. The selection and application of chemicals is addressed in 14.3 and 14.4. The type and use of all agricultural chemicals are to follow manufacturer, regulatory and intended purpose.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III GAP	14.6	Input - Agricultural chemicals	Agricultural chemicals shall comply with applicable legislation (both country of production and intended sale), be correctly labelled, stored in a safe, well-ventilated place away from production areas, living areas and harvested crops and disposed of in a manner that does not pose a risk of contaminating crops.		Recommend the following change: Agricultural chemicals shall comply with applicable legislation (both country of production and intended sale), be correctly labelled, stored in a safe, well-ventilated place away from production areas, living areas and harvested crops and disposed of in a manner that does not pose a risk of contaminating crops. Water used for chemical applications shall be microbiologically equivalent to irrigation water.	Couldn't reach consensus
CPO 12	Part III GAP	14.7	Input - Approved medicines and vaccines	Procured medicines and vaccines shall comply with applicable legislation (both country of production and intended sale) and be marked by the manufacturer.			Opportunity Identified
CPO 12	Part III GAP	14.8	Input - Approved medicines and vaccines	The farmer shall be able to demonstrate proof of purchase of veterinary medicines and vaccines at all times through the use of specific documentation, receipts from the veterinary pharmacy and copies of veterinary prescriptions or production orders for in-feed medicines.			Opportunity Identified
CPO 12	Part III GAP	14.9	Input - Approved medicines and vaccines	All documentation shall be completed or verified by the veterinarian or recognised competent adviser.			Opportunity Identified
CPO 12	Part III GAP	14.10	Input - feed	Feed shall not be contaminated by packaging or other foreign materials.			Opportunity Identified
CPO 12	Part III GAP	15	Transport	All containers and vehicles used for the storage and transportation shall be suitable for the intended purpose to minimise food safety risks.			Opportunity Identified
CPO 12	Part III GAP	16.1	Storage	Cleaning materials, veterinary medicines and agricultural chemicals shall be specifically identifiable, stored appropriately and used according to the manufacturer's instructions for their intended purpose.			Opportunity Identified
CPO 12	Part III GAP	16.2	Storage - feed	Storage sites for feed and feed components shall be checked at regular intervals for cleanliness, fungus, moulds, temperature and other potential contamination.			Opportunity Identified
CPO 12	Part III GAP	16.3	Storage - feed	Suitable storage shall allow the integrity of batch numbers or the originator's identification marks to be retained. The mixing of feeds from different species, growers or manufacturers shall be avoided by using separate silos and other means of storage.			Opportunity Identified
CPO 12	Part III GAP	16.4	Storage – approved medicines and vaccines	Veterinary medicines and vaccines shall be stored in accordance with the information on the label.			Opportunity Identified
CPO 12	Part III GAP	16.5.1	Storage – approved medicines and vaccines	In-feed medicines and vaccines shall be stored in such a way that the risk of unintentional feeding to animals is minimised.			Opportunity Identified
CPO 12	Part III GAP	16.5.2	Storage – approved medicines and vaccines	In-feed medicines and vaccines shall be stored in such a way that the risk of unintentional feeding to fish is minimised.			Opportunity Identified
CPO 12	Part III GAP	17	Stock Management	Comprehensive livestock records shall be kept. Those records shall detail current livestock on the farm, an overview of recent livestock transactions, livestock inputs and outputs, movements off and on farm, and the recent loss situation within a population or livestock production unit. These shall be to either animal or batch, as appropriate to the industry norm for the species.			Opportunity Identified
CPO 12	Part III GAP	18.1	Equipment	Equipment and containers coming into contact with livestock and feedstuffs shall be made of materials that are non-toxic and designed and constructed to ensure that they can be cleaned, disinfected and maintained to avoid contamination.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III GAP	18.1	Equipment	Equipment and containers coming into contact with livestock and produce shall be made of materials that are non-toxic and designed and constructed to ensure that they can be cleaned, disinfected and maintained to avoid contamination.			Opportunity Identified
CPO 12	Part III GAP	18.1	Equipment	Equipment and containers coming into contact with livestock and grain and pulses shall be made of materials that are non-toxic and designed and constructed to ensure that they can be cleaned, disinfected and maintained to avoid contamination.			Opportunity Identified
CPO 12	Part III GAP	18.2	Equipment	Equipment shall be used and stored to minimise food safety risk.		Recommend the following change: Equipment shall be maintained, used, transported and stored to minimize food safety risk.	Agree
CPO 12	Part III GAP	18.3	Equipment	Veterinary equipment, including used and unused disposable medical items, shall be stored securely, safely and according to the manufacturer's instructions.			Opportunity Identified
CPO 12	Part III GAP	18.4	Equipment	Medical instruments shall be clean and suitable for the intended use			Opportunity Identified
CPO 12	Part III GAP	18.5	Equipment	Equipment for the storage of liquid manure, contaminated yard water and silo seepage / liquid waste shall be stable and permanently watertight.			Opportunity Identified
CPO 12	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements	Opportunity Identified
CPO 12	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	The same food safety risks do not apply to direct and non-direct contact. This requirement should be clarified so it is clear on the intent to maintain food safety.	Opportunity Identified
CPO 12	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	Ingredient is not defined so it is not clear how this would be applied and to which FCCs. There are some instances, such as washing produce for removing soil, in which the water is treated. Having an absolute requirement does not allow for a risk based approach to food safety.	Opportunity Identified
CPO 12	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Recommend to eliminate the additional language. The added wording is too prescriptive and doesn't allow for regional differences in terminology and risk.	Agree
CPO 12	Part III GMP	17	Stock management	A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.		this is not applicable to the BIII scope.	Opportunity Identified
CPO 12	Part III GMP	18	Equipment	Equipment shall be suitable for the intended purpose. Equipment shall be designed, constructed, maintained, used and stored to minimise food safety risks.		Equipment shall be suitable for the intended purpose. Equipment shall be designed, constructed, maintained, cleaned, sanitized, used, transported and stored to minimize food safety risks. Sanitizing of equipment is subject to risk assessment.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III GMP	1.1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe feed and to prevent its contamination.			Opportunity Identified
CPO 12	Part III GMP	1.2	Site environment	The site shall be located and maintained to enable the reception, storage, production and offering of safe food and to prevent its contamination.			Opportunity Identified
CPO 12	Part III GMP	1.3	Site environment	The site shall be located and maintained to enable the reception, storage, and distribution of safe food and to prevent its contamination.			Opportunity Identified
CPO 12	Part III GMP	1.4	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe packaging and to prevent its contamination.			Opportunity Identified
CPO 12	Part III GMP	2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the production of safe products.			Opportunity Identified
CPO 12	Part III GMP	2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the offering of safe products.			Opportunity Identified
CPO 12	Part III GMP	2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the reception, storage, and distribution of safe products.			Opportunity Identified
CPO 12	Part III GMP	3	Site design, construction, layout and flow of operations	The site, both the exterior and the interior, shall be designed, constructed and maintained to minimise food safety risks. The layout and flow of operations shall be suitable for the intended purpose and designed to minimise food safety risks.			Opportunity Identified
CPO 12	Part III GMP	3.2	Site design, construction, layout and flow of operations	The building in which equipment is manufactured shall be designed, constructed and maintained to minimise any contamination of the manufactured equipment which may affect food safety.			Opportunity Identified
CPO 12	Part III GMP	4.1	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to prevent or minimise risk of contamination and cross-contamination of purchased materials, work in progress, rework, packaging and finished product covering all aspects of food safety.			Opportunity Identified
CPO 12	Part III GMP	4.2	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to maintain product integrity and regulatory compliance regarding the disposal, resale, donation, restocking or reuse of product being salvaged or reclaimed.			Opportunity Identified
CPO 12	Part III GMP	4.3	Product contamination risk and segregation	Procedures and control measures shall be in place to manage the use of feed medication where applicable.			Opportunity Identified
CPO 12	Part III GMP	4.4	Product contamination risk and segregation	The use of ingredients that contain substances that can be deleterious to certain classes of animals shall be appropriately managed.			Opportunity Identified
CPO 12	Part III GMP	4.5	Product contamination risk and segregation	An inspection process shall be in place at lairage and / or at evisceration to ensure animals are fit for human consumption.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III GMP	4.6	Product contamination risk and segregation	Defined post-slaughter time and temperature requirements shall be in place in relation to the chilling or freezing of product.			Opportunity Identified
CPO 12	Part III GMP	4.7	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to ensure printed materials are not mixed or intermingled with other materials including in-process and reworked materials.			Opportunity Identified
CPO 12	Part III GMP	4.8	Product contamination risk and segregation	Suitable employee, contractor and visitor access requirements shall be in place such that food safety is not compromised if construction is undertaken at a site in which food is being handled.			Opportunity Identified
CPO 12	Part III GMP	4.9	Product contamination risk and segregation	Procedures shall be in place to prevent the cross-contamination of food from hazards created by construction activities if construction is undertaken at a site in which food is being handled.			Opportunity Identified
CPO 12	Part III GMP	4.10	Product contamination risk and segregation	Prior to building commissioning or equipment dispatch, buildings / equipment shall be cleaned by the manufacturer / constructor using appropriate methods that will remove all food safety hazards associated with the construction process. Cleaning should be recorded and verified.			Opportunity Identified
CPO 12	Part III 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 should be recorded and verified.	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 be recorded and verified.		Opportunity Identified
CPO 12	Part III GMP	5	Employee facilities	Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.			Opportunity Identified
CPO 12	Part III GMP	6.1	Personal hygiene, protective clothing and medical screening	Documented personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.			Opportunity Identified
CPO 12	Part III GMP	6.2	Personal hygiene, protective clothing and medical screening	Suitable protective clothing shall be provided to minimise food safety risks.			Opportunity Identified
CPO 12	Part III GMP	6.3	Personal hygiene, protective clothing and medical screening	A medical screening procedure shall be established, implemented and maintained to identify conditions impacting food safety and that any person affected shall immediately report illness or symptoms to management, subject to legal restrictions in the country of operation.			Opportunity Identified
CPO 12	Part III GMP	6.4	Personal hygiene, protective clothing and medical screening	The requirements 6.1, 6.2, and 6.3 shall apply to employees, contractors and visitors commensurate to their impact on food safety.			Opportunity Identified
CPO 12	Part III GMP	7	Training	Procedure shall be established, implemented and maintained to ensure that all employees are trained, and retrained as necessary to have an understanding in food safety, commensurate with their activity.			Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III GMP	7.2	Training	Procedures shall be established, implemented and maintained to ensure all employees and contractors involved in building and equipment evaluation, specification, purchase and hygienic design shall be trained in hygienic design principles appropriate to their tasks and to the hygienic design requirements of the building or equipment for its intended use.			Opportunity Identified
CPO 12	Part III GMP	7.3	Training	Procedure shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	Procedures shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.		Opportunity Identified
CPO 12	Part III GMP	8.1.1	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.	Procedures for housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.		Opportunity Identified
CPO 12	Part III GMP	8.1.2	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a feed safety risk.	Procedures for housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a feed safety risk.		Opportunity Identified
CPO 12	Part III GMP	8.1.3	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks of cleaning shall be validated and verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a packaging safety risk.	Procedures for housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks of cleaning shall be validated and verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a packaging safety risk.		Opportunity Identified
CPO 12	Part III GMP	8.2	Housekeeping, cleaning and disinfection	Cleaning facilities, equipment and chemical materials shall be suitable for their intended use and shall be stored and used appropriately.			Opportunity Identified
CPO 12	Part III GMP	9	Rework	Rework shall be managed to minimise food safety risks and not to compromise traceability.			Opportunity Identified
CPO 12	Part III GMP	10	Site inspections / checks	A programme of site inspections / checks shall be established, implemented and maintained to ensure the site environment and processing equipment are maintained in a suitable condition to ensure food safety, as applicable to the activity of the site.			Opportunity Identified
CPO 12	Part III 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.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III GMP	12.2	Waste management	A system shall be in place to control the disposal of trademarked material.			Opportunity Identified
CPO 12	Part III GMP	14	Reception of purchased materials	Appropriate procedures for the reception of purchased materials shall be established, implemented and maintained to assure that only materials that meet food safety requirements are accepted.			Opportunity Identified
CPO 12	Part III GMP	15	Transport	All containers and vehicles used for transportation in a way that could impact food safety shall be designed, constructed and maintained to minimise food safety risks. They shall be suitable for the intended purpose			Opportunity Identified
CPO 12	Part III GMP	15.2	Transport	Manufactured equipment shall be stored and transported to the final customer in a manner that prevents contamination of the equipment which may affect food safety.			Opportunity Identified
CPO 12	Part III GMP	16.1	Storage	Food shall be held or stored in designated areas and handled under controlled conditions to minimise food safety risks.			Opportunity Identified
CPO 12	Part III GMP	16.2	Storage	Feed shall be held or stored in designated areas and handled under controlled conditions to minimise food safety risks.			Opportunity Identified
CPO 12	Part III GMP	16.3	Storage	Packaging shall be held or stored in designated areas and handled under controlled conditions to minimise food safety risks.			Opportunity Identified
CPO 12	Part III GMP	19	Maintenance	Effective planned maintenance shall be in place for the site and equipment to minimise food safety risks. Maintenance activities shall not represent food safety risks.			Opportunity Identified
CPO 12	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements and resubmitted for commenting once clarified.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	The reference to "current version" is problematic. There needs to be an implementation period of up to 18 months for all reference for the current version of the IAF MD4, IAF MD1, Codex, etc. Please consider the FSPCA Preventive Controls for Human Food (PCHF) training as a means to demonstrate competence for auditors. The FSPCA PCHF curriculum follow the same principles as that described in the latest version of the CODEX Alimentarius General Principles of Food Hygiene and outlined in this section. The revised curriculm and training is globally recognized and provides a systematic and comprehensive approach to identifying specific hazards and implementing measures for their control to ensure the safety of food.	Opportunity Identified
CPO 12	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	The reference to "current version" is problematic. There needs to be an implementation period of up to 18 months for all reference for the current version of the IAF MD4, IAF MD1, Codex, etc.	Opportunity Identified
CPO 12	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Recommend to include the term "Significant food safety hazards" to include those hazards that require control measures	Opportunity Identified
CPO 12	Part III HACCP	1.5	Hygienic design process	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new buildings/equipment.	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade or improvements.	The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.6	Hygienic design process	The hygienic design and suitability of buildings and equipment shall be evaluated throughout their life cycle from the design concept, through construction, purchasing and during use, until the end of their intended life.	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.	The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.7	Risk assessment	A documented hygienic design risk assessment for food safety hazards on new and existing buildings/equipment shall be established, implemented and maintained. It shall include as a minimum the following considerations: intended use, food safety hazard identification, evaluation.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III HACCP	1.8	Risk assessment	The hygienic design risk assessment shall be reviewed when any change to the building/equipment/product/process is made or other hazards arise, or at a minimum frequency defined by applicable laws and regulations.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.9.1	Intended use	The intended use of the building/equipment shall be specified.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.9.2	Intended use	The intended use of the building/equipment shall be described, as a specification for the intended purchase of new buildings and equipment.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.10	Hygienic design principles	Appropriate building/equipment hygienic design principles shall be adopted based on the designated risk assessment, appropriate to their intended use and taking into consideration a user specification.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.	The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.12	Hygienic design principles	Buildings and equipment shall be designed and constructed to avoid favourable growth conditions (for microorganisms, pests and their harbourage), appropriate to their intended use.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.13	Hygienic design principles	Buildings and equipment shall be designed to prevent contamination, appropriate to their intended use.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.14	Hygienic design principles	Wherever relevant, recognised hygienic design standards/guidance shall be consulted for the design and construction of buildings and equipment, appropriate for their intended use.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.15	Hygienic design principles	Appropriate hygienic design principles shall be adopted for the installation of new equipment and construction of buildings at sites handling food.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part III HACCP	1.16	Hygienic design principles	Hygienic design principles shall be adopted to ensure the maintenance of the hygienic performance of the buildings/equipment, appropriate for their intended use.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 12	Part III HACCP	1.17	Hygienic design mitigation	Appropriate measures (with frequencies) shall be specified, undertaken accordingly and documented to mitigate any remaining food safety risks identified in the hygienic design risk assessment following building/equipment construction, purchase and installation.		The applicable FCCs for this requirement is not clearly identified. As this is the only reference for the J1 and J2 scopes this requirement should be limited to these scopes only.	Opportunity Identified
CPO 12	Part IV Glossary	Glossary				Add definition for **Unannounced audit:** An audit undertaken on a date chosen by the certification bodyin which no notice shall be given. Unnaounced audits do not apply to scopes AI, AII, BI, BII and BIII.	Couldn't reach consensus
CPO 12	Part IV Glossary	Glossary				Add definition for **Biosolids**: Biosolids are the solid fraction composed of predominantly organic matter, resulting from the separation of liquid waste and solids content during the processing of human sewage. For allowed land application, solid waste (aka sewage sludge) treatment must meet the regulatory verification requirements for pathogen reduction process controls and end-point indicator and pathogen testing criteria specifications. In addition to the potential for residual human pathogens, biosolids may contain concentrations of heavy metals and human bioactive compounds of concern for use in fresh produce production, irrespective of the negligible foodborne risk as determined by scientific risk assessments.	Couldn't reach consensus
CPO 12	Part IV Glossary	Glossary				Add defintion for **Significant food safety hazard:** identified through the hazard assessment, which needs to be controlled by control measures.	Couldn't reach consensus
CPO 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	No additional references	Agree
CPO 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Keep 2 CBs as a minimum	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Delete examples since they may or may not impact the quality of the delivery of the GFSI recognized certification program and could be interpreted as the requirement itself. Requirement could be removed altogether, or we would support the addition of the following wording: "a situation potentially impacting the quality of the delivery of the GFSI recognised certification programme". A change of ownership or changes to key personnel do not automatically mean that the programme has stopped operating effectively. The changes could in fact lead to improved delivery of the programme.	Opportunity Identified
CPO 2	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Agree with WG comments - the process for new and existing CPOs should be different.	Opportunity Identified
CPO 2	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	We do not support the WG suggestion. Timeline may be beyond the CPO's control.	Couldn't reach consensus
CPO 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Suggest changing the eligibility criteria for recognized programs so that GFSI can perform a continued recognition assessment of an existing GFSI recognized program (in good standing) to the new requirements prior to implementation. These continued recognition assessments should cover both Part II and Part III requirements with the goal of making the audit transition for participating facilities much more fluid. If this could occur the recognized CPOs would be able to implement the required changes, the CBs would be able to update their accreditation to the new program version, and program participants would not need to go through duplicative audits awaiting completion of the re-benchmarking process.	Couldn't reach consensus
CPO 2	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	Agree with WG comments - the current GFSI scopes align with ISO 22003	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		The full application process should not apply to existing recognized CPOs. Re-benchmarking could be completed within a 'continued recognition' process. For already recognized programmes, there is no need to demonstrate market demand by submitting 10 certificates per GFSI scope.	Couldn't reach consensus
CPO 2	Part I	4	Methodology	Benchmark Leader	GFSI Benchmark Leader	Conflict of interest requirements to be defined and be at least 2 years, aligned with current ISO principles	Couldn't reach consensus
CPO 2	Part I	4	Methodology	GFSI Executive Director	GFSI Director	They may reassign the Benchmark Leader at any time, with sufficient notification to the CPO. The current workplan of the CPO benchmarking or MCA processes shall not be negatively impacted as a result.	Couldn't reach consensus
CPO 2	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Suggest CPOs be given 12 months to reapply against new benchmarking requirements, to allow for effective change management within the CPO and implementation of version updates within CBs and FBOs	Couldn't reach consensus
CPO 2	Part I	5	Key procedural steps		Consider allowing re-application within less than 12-month period, where the CPO implemented the required actions Question on the number 10 as the required number of certificates (need tangible criteria for defining a threshold) Use more concise descriptions of the steps (bullet points, flowcharts or diagrams to visually represent the procedural steps) This can help readers quickly understand the process flow and the relationships between different steps Maintain a uniform structure for each procedural step. Start each section with a brief overview, followed by detailed steps Provide more context or examples where necessary. Explain why certain steps are important or what the implications are if they are not followed correctly. Include real-world examples or case studies to illustrate the application of these steps Include a section on common issues or FAQs that might arise during the procedural steps, along with solutions or best practices Highlight any critical compliance or legal requirements associated with each procedural step. This can prevent potential oversights that may have legal implication	Agree with first point Remove the 10 certificate requirement	Opportunity Identified
CPO 2	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	"Preventative actions" is not appropriate at CPO level; keep current wording as is	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part I	5	Key procedural steps	A => Application		Proposed revision: In the year prior to publication of a new version of the GFSI benchmarking requirements, no new application will be accepted. A notice will be displayed on the GFSI website to indicate the starting date of this one-year period, and existing GFSI recognized CPOs will be informed in writing/via email	Opportunity Identified
CPO 2	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Steering Committee decision and communicating to the CPO	Couldn't reach consensus
CPO 2	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Agree with WG comment	Agree
CPO 2	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Agree with first point There should be at least one member (preferably more) of the Appeals Committee who has expertise in practical application of the GFSI BMRs and who has knowledge specific to the scope/sector in question. This would ensure that the Committee has an understanding of the entire process.	Agree
CPO 2	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		There should be a published timeframe for identification of non-alignment, response (e.g. CAP) and corrective actions taken by the CPO, and sanctions.	Opportunity Identified
CPO 2	Part I	6	Sanctioning	This recommendation is passed to the GFSI Executive Director and the GFSI Board for final decision. The GFSI Technical Manager will inform the Certification Programme Owner of this final decision, including a full explanation for it.		Revise 'Board' to 'Steering Committee'	Agree
CPO 2	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		Suggested addition: The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time to prepare a stakeholder communication plan, prior to the suspension being published on the GFSI website.	Agree
CPO 2	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		Suggested addition: The CPO shall be informed in writing in the case of withdrawal, prior to the withdrawal being published on the GFSI website.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part I	6	Sanctioning	The Certification Programme Owner has the right to appeal against any decision made by the GFSI Board, the GFSI Executive Director or any person contracted to GFSI in relation to the Benchmarking Process.		Revise 'Board' to 'Steering Committee'	Agree
CPO 2	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	The 'continued recognition' process should encompass Part II and Part III assessments for GFSI recognized organizations going through the re-benchmarking process against a new version of the GFSI requirements.	Opportunity Identified
CPO 2	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.		Align definition of 'ownership' with Part I definition	Agree
CPO 2	Part II	1.11	Certification Programme Development and Maintenance	The consultation period shall allow sufficient time for stakeholders to review the Certification Programme under development and send their comments to the Certification Programme Owner.		9 month timeframe for currently recognized CPO to apply for re-benchmarking is in conflict with this requirement. CPO version update processes (including stakeholder consultation) have a longer timeframe than 9 months - to draft, consult on, refine and implement changes.	Opportunity Identified
CPO 2	Part II	3.1	Relationship with Certification Bodies	The Certification Programme Owner shall have contractual and enforceable arrangements with all Certification Bodies accredited to ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003 to operate their Certification Programme.		Duplication. Accreditation requirements should not be repeated in the benchmarking requirements, since it is a GFSI requirement for CBs to be accredited.	Couldn't reach consensus
CPO 2	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		There needs to be an implementation period of up to 18 months for CPOs to incorporate references into normative documents from standards that are external to the CPO. Transitioning to current versions of IAF MD4, IAF MD1, Codex, etc. cannot happen without a suitable delay. These standards are subject to review on different timeframes that will not always align with CPO update and revision processes.	Couldn't reach consensus
CPO 2	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus
CPO 2	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Remove: "at all times" or reword (e.g., "upon request").	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Examples are too broad and need to be clarified. A serious food safety situation is an outbreak. When reporting to GFSI is required, additional requirements outlining the minimum information should be included. Also need agreed upon timeframes for reporting and for GFSI to respond back to the CPO.	Opportunity Identified
CPO 2	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		Remove product recalls from the list of risk factors as # of company recalls is not a metric linked to CB performance	Opportunity Identified
CPO 2	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	We do not support publication of CB KPI results. This info is provided to GFSI during CPO assessments. KPIs are intended to drive or reinforce good performance to CPO's program and are intended to be used to optimized the program, drive collaboration and open communication with CBs. Since KPIs are very much driven by the CPO they are likely unique to each program with different criteria and may lead to confusion if results are published.	Couldn't reach consensus
CPO 2	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus
CPO 2	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree. Remove the emphasis on the specific education requirement. Having a degree in a specific field does not make a good auditor and is currently a restriction to onboard new auditors. An evaluation of the candidate's education can be included in the auditor qualifications; however, the years of industry and auditing experience, in addition to continuing education courses should be granted more value. Provide an avenue for additional training or a plan for further education vs only using higher education.	Opportunity Identified
CPO 2	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	We do not support WG suggestion. Removing "quality assurance" experience will make it even harder to find auditors who meet the requirements. It's very hard to find primary ag auditors who have 2 years FT in a food safety role	Opportunity Identified
CPO 2	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Need to allow for grandfathering of existing auditors and have requirements linked to the benchmarking version in effect at the time of qualification. Only new entrants need to meet current requirements.	Opportunity Identified
CPO 2	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Leave the requirement as it is currently worded. For exports, the onus is on the FBO to obtain and provide to the auditor relevant information about export market requirements. Auditors cannot be expected to be familiar with the relevant laws and regulations in an unlimited number of export markets.	Agree
CPO 2	Part II	4.15	Maintenance of Auditor Skills and Competence	In specific situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.		If WG proposed changes to 4.14 are accepted, then 4.15 is not needed.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 2	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Leave the requirement as it is currently worded, or change to 'where the integrity of the certification could be at risk'. Having a "type" of non-conformity is not a requirement for CPO standards. Broader/more generic wording gives the CBs the flexibility they need to investigate as needed.	Agree
CPO 2	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree that this is a much-needed modification.	Opportunity Identified
CPO 2	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	We do not support the WG comment. The information is already required to be on the certificate.	Couldn't reach consensus
CPO 2	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Leave wording as is. Confidentiality would have to be preserved for all reports that are proprietary to the FBO.	Couldn't reach consensus
CPO 2	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Agree with there being an indication on the certificate when the certificate is issued against a GFSI-recognized programme, as long as that identification is not the GFSI logo (too complex for CBs to manage associated branding rules). Disagree with the preferred method being an "e-solution" / database as this is more onerous to manage and would add further complexity to the system, since the certificate is issued by the certification body. Info about CPO suspension is publicly available on GFSI website.	Couldn't reach consensus
CPO 2	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	Agree	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Agree	Opportunity Identified
CPO 2	Part II	5.34	Use of ICT during the audit	The CPO shall specify the maximum period of time between the beginning and the end of all audit activities included in the audit duration to maintain the audit efficiency and integrity. That period of time shall not exceed 30 days.		Clarify that the 30 day timeline refers to a single audit being carried out, and does not apply to auditing the sites in a multi-site certification.	Couldn't reach consensus
CPO 2	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Difficult to evaluate proposal until draft text is available for comment	Opportunity Identified
CPO 2	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	Propose to add as follows: If necessary, a small number of the sample sites may be audited prior to the audit of the central function, with proper justification	Couldn't reach consensus
CPO 2	Part II	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 and independent from the sites.	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 ~~and independent~~ from the sites.	Leave as is	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part II	6.16	Internal audit	Clear requirements for internal auditors and technical reviewers shall be defined, documented and reviewed by the Certification Body.	Clear requirements for internal auditors and ~~technical~~ reviewers shall be defined, documented and reviewed by the Certification Body.	Leave as is	Agree
CPO 2	Part II	6.21	Site audit sampling	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. 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.	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. 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	Add ISO 22003-1 or ISO 22003-2 as applicable, as sampling requirements are set out in these normative accreditation documents, that are different to IAF MD1. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
CPO 2	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
CPO 2	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
CPO 2	Part II	6.24	Site audit sampling	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.	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 MD1	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements. This WG comment would render all of the CPO standards out of compliance.	Opportunity Identified
CPO 2	Part II	6.25	Management of non-conformities	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.	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	Note that IAF MD1 only applies to management system certification.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 2	Part II	6.26	Management of non-conformities	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.	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 MD1	Note that IAF MD1 only applies to management system certification.	Opportunity Identified
CPO 2	Part II	6.27	Management of non-conformities	If the central function, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including the central function and all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.	Define "critical Certification Programme requirements" or suggest to replace by "leading to major non conformities". Some members suggested " fundamental certification programme requirements".	Change to: fails to meet the certification programme requirements (including not addressing any NCs raised within the defined timelines)	Couldn't reach consensus
CPO 2	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	In terms of a multi-site - the central function is responsible and HO terminology should not be introduced here.	Agree
CPO 2	Part II	6.32	Certificates	If the multi-site organisation is allowed to sell their product outside of the group or multi-site organisation, in all cases the member sites shall be transparent about the source and scope of certification, by providing customers with a copy of the certificate as issued above.	Certificate to include detailed description of the scope as it relates to the inclusion of Head Office or not.	Already covered by another proposed revision (6.3.1)	Couldn't reach consensus
CPO 2	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.		Couldn't reach consensus
CPO 2	Part III FSMS	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.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Couldn't reach consensus
CPO 2	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	As with Part III HACCP comments - the term 'latest version' needs a system of change management as a change to a Codex document cannot immediately be incorporated into CPO standards. We do not support additional wording proposed by WG. This requirement is about a site's senior management commitment. The evidence of that is built into the site's processes as defined elsewhere in this benchmark; therefore, the proposed addition does not add value.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part III FSMS	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.	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. *Suggest to update according to Codex: Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	We do not support the WG proposal - leave the requirement as is.	Misunderstood
CPO 2	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	The last part of the proposed addition seems unnecessarily wordy ("to demonstrate the effective operation the Food Safety Management System.") This could be deleted without changing the intent of the requirement.	Agree
CPO 2	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Applicable GFSI scopes are not identified for proposed change. We do not support the proposed addition to the B scopes. If deemed applicable to B scopes, the term 'validation' should be changed to 'verification'.	Opportunity Identified
CPO 2	Part III FSMS	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.	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 - add intended consumption as well?	We do not support WG suggestion to add this wording.	Couldn't reach consensus
CPO 2	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	Redundant. Already covered by element 3 above (management review)	Couldn't reach consensus
CPO 2	Part III GAP	1	Land used for production	Land used for production shall be evaluated for hazards and contamination. Control measures shall be implemented to reduce hazards to acceptable levels.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	We do not support the proposed WG addition. Documenting the rationale for which agricultural chemicals are selected is not necessary when the requirements in 14.3 and 14.6 are followed (i.e., only approved chemicals are used, and legislation and label directions are followed). Chemical use that adheres to applicable legislation is considered safe for consumers. Documenting decisions around chemical use for other reasons (e.g., environmental protection) is outside of GFSI's scope.	Agree
CPO 2	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.		Opportunity Identified
CPO 2	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified
CPO 2	Part III GMP	17	Stock management	A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.		This requirement does not fit for GFSI scope B3 and should be removed for that scope. Stock management of perishable fresh produce items is done for quality reasons. It does not need to be part of a food safety program. Spoiled produce is not saleable and will not be consumed.	Opportunity Identified
CPO 2	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified
CPO 2	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 2	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified
CPO 2	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified
CPO 2	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	The hazard analysis, rather than 'the hazard and risk management system' would have already considered the likelihood of occurrence and defined appropriate control measures. The intent of the additional proposed wording is not clear. If the system is effectively implemented in accordance with the HACCP Plan, when would there be an absence of control measures?	Opportunity Identified
CPO 3	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Support the possibility of 1 CB. This will support small programmes. Our experience is that the risk of monopoly is most unlikely as the programme will always be open to any CB.	Couldn't reach consensus
CPO 3	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Support the current formulation of the element.	Couldn't reach consensus
CPO 3	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Support that the process for new and existing CPOs should be risk based e.g. remove requirement for 12 months operation for already benchmarked CPOs based in their history of compliance.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 3	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	Support the current formulation of the element.	Agree
CPO 3	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Support the suggestion from the working group. It is always a challenge to get FBOs (Food Business Operators) to apply the new version of a programme before it is GFSI benchmarked. It is difficult to reach 10 certificates before applying. Suggest to delete requirement of at least 10 valid certificates. Suggest to keep requirement of at least one valid certificate for each CB. This is considered to be sufficient to conduct the GFSI assessment in combination with the history of compliance.	Agree
CPO 3	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	Support that the process for new and existing CPOs should be risk based e.g. remove requirement for 12 months operation for already benchmarked CPOs based in their history of compliance.	Opportunity Identified
CPO 3	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		Support that the process for new and existing CPOs should be risk based e.g. remove requirement for 12 months operation for already benchmarked CPOs based in their history of compliance.	Opportunity Identified
CPO 3	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.	Support that the process for new and existing CPOs should be risk based e.g. remove requirement for 12 months operation for already benchmarked CPOs based in their history of compliance.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 3	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Suggest to extend period to 12 months (from nine months) to limit the need of involving the GFSI Steering Commitee in extending the period under special circumstances.	Couldn't reach consensus
CPO 3	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Support the current formulation.	Agree
CPO 3	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Suggest to include relevant stakeholders according to the specific case, selected from the whole Eco system (Retailers, Manufacturers, CBs, CPOs etc), not being involved in the decisions taken.	Agree
CPO 3	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		Suggest to include a definition of non-alignment in the glossary.	Couldn't reach consensus
CPO 3	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		Suggest to include 'in due time': *The GFSI Executive Director shall formally inform the Certification Programme Owner in due time of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.*	Couldn't reach consensus
CPO 3	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		Suggest to include 'in due time': *If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner in due time of this decision.*	Couldn't reach consensus
CPO 3	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.		We assume that membership of IAF includes regional memberships, like e.g. European Accreditation.	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 3	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Support to include: 'any serious food safety situations', however examples should be deleted, as it is the food safety seriousness that is sigificant, not the type of situation.	Opportunity Identified
CPO 3	Part II	3.12	Desktop Assessment	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance on audit and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records.	Support to keep current formulation.	Agree
CPO 3	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	Our experience is that the performance monitoring is an improvement tool in the collaboration and open communication between CBs and CPOs. It is not a result as such and therefore not relevant to publish.	Couldn't reach consensus
CPO 3	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	Suggest to delete examples and include soft and hard skills: *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 Program Owner. This includes both soft and hard personal skills .*	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 3	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Support the WG comment.	Opportunity Identified
CPO 3	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Suggest to include 'or equivalent': *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 quality assurance or food safety functions and requirements defined in table 1, column 4 or equivalent .*	Opportunity Identified
CPO 3	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Suggest to include 'or equivalent': *The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, or equivalent and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.*	Opportunity Identified
CPO 3	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Suggest to add the following sentence: If a food safety auditor is already approved for auditing GFSI-recognised Certification Programmes, only one witness audit against the specific Certification Programme is needed (mutual recoqnition of auditors without 3 food safety audits against the specific Programme as initial qualification).	Opportunity Identified
CPO 3	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Support the current formulation. Please note that the laws and regulation of the country of origin (production) is the key issue here, besides relevant international requirements in case of exports. Many exporting FBOs (Food Business Operators) export to more than 130 different countries. It is not relevant that an auditor knows specific laws and regulations in all these countries, It will always be the responsibility of the FBO.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 3	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	We support the comment from the WG.	Couldn't reach consensus
CPO 3	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	We support the comment from the WG.	Opportunity Identified
CPO 3	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Support the current formulation.	Couldn't reach consensus
CPO 3	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	We support the comment from the WG	Opportunity Identified
CPO 3	Part III FSMS	3	Management review	The senior management shall review all elements of the Food Safety Management System, including 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.		We suggest to refrase the element and include Food Safety Culture: *The senior management shall review all elements of the Food Safety Management System, including the Food Safety Culture, 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.*	Opportunity Identified
CPO 3	Part III FSMS	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.		We suggest to make it clear, that growing a strong Food Safety Culture should be part of the food safety policy.	Couldn't reach consensus
CPO 3	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	We support the comment from the WG	Opportunity Identified
CPO 3	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	Suggest this is included in the Food Safety Culture.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 3	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Support the current formulation.	Agree
CPO 3	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	We support comment from WG.	Opportunity Identified
CPO 3	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.	We support comment from WG.	Agree
CPO 3	Part IV Glossary	Glossary	Non-conformity	Non-fulfilment of a requirement.	ISO/ IEC 19011 ISO/ IEC 9000	Suggest to clarify difference related to non-alignment (see comment to part I, line 35) or maybe define non-alignment.	Couldn't reach consensus
CPO 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	**Agree with this comment about risk of monopoly.**	Agree
CPO 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	need to define significant change. Disagree with examples given. People changes do not constitue a significant change. and explain how those examples would affect the benchmark.	Opportunity Identified
CPO 4	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	**Same as above, need to distinguish between a new Standard with a new CPO and an already benchmarked standard undergoing a version change.**	Opportunity Identified
CPO 4	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	**Do not agree with WG comment - an ongoing investigation is not grounds to put benchmarking on hold. This statement provides too much open interpretation. Examples for types of investigations and timeframe of when the CPO could re-apply is needed.**	Agree

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	**Agree with the comments of WG member this should be applicable only for the new Standard and not for the already benchmarked Standard undergoing the version change as this is a fundamental blocker to benchmark process. CPOs should be able to start the process in advance of or as soon as the new version of the Standard is published. Desk review can start immediatley the new version of the Standard and the Key Changes Summary documents are available. The process should focus on the changes and should not need a full review with the Benchmark again. There must be clarificatopn on the BM process wrt previous audits to the Scheme being recognised by GFSI benchmark approval.**	Agree
CPO 4	Part I	1	Eligibility Criteria	The Certification Programme Owner is a legal entity,		**Ownership requirments different in Parts 1 and part 2 - need to be aligned.**	Agree
CPO 4	Part I	1	Eligibility Criteria	A Certification Programme is deemed to become operational on the date on which the first accredited certificate is issued by a Certification Body,		**Need to clarify if this is specifically for a new Standard or a an already benchmarked standard undergoing a revision which has been accredited and benchmarked historically.** **The programme should be "operational" on the date that accredited audits can commence (i.e. first go live date when audits can commence.)**	Couldn't reach consensus
CPO 4	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	The comment of WG is not in relation to this requirement. It relates to Element 2 :Scopes. Its more about stages of Benchmarking.	Agree
CPO 4	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		need to clarify significant changes. people changes within an organisation should not constitute a signifcant change.	Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.	Should be differentiated based on the application options if the Standard is for full benchmarking or the previous version of the Standard is benchmarked. This comment from the WG is in the wrong place - it refers to section 3. application option. We agree there should be a different process when a new benchmark versus a maintain bench mark process is being different. A version update of an already benchmarked Standard should not require a full benchmark review.	Opportunity Identified
CPO 4	Part I	4	Methodology	Benchmark Leader	GFSI Benchmark Leader	For All GFSI Benchmarking team - clarification on what the conflict of interest that would apply when assessing a CPO. Follow ISO process - should not assess a scheme in which they had worked or had infleunce on for the previous 2 years . A CPO should be able to object to a BML. Similar to sites objecting to scheme auditors, or CBs objecting to AB auditors.	Couldn't reach consensus
CPO 4	Part I	4	Methodology	GFSI Executive Director	GFSI Director	For All GFSI Benchmarking team - clarification on what the conflict of interest that would apply when assessing a CPO. Follow ISO process - should not assess a scheme in which they had worked or had infleunce on for the previous 2 years .	Misunderstood
CPO 4	Part I	4	Methodology	GFSI Technical Manager	GFSI Senior Technical Manager or assigned by the GFSI Senior Technical Manager	For All GFSI Benchmarking team - clarification on what the conflict of interest that would apply when assessing a CPO. Follow ISO process - should not assess a scheme in which they had worked or had infleunce on for the previous 2 years .	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	1. Define what the special circumstances are and how this additional time is communicated. 2. Nine months is too short especially if a public consultation is required to ensure changes are shared with stakeholders. The fully benchmarked CPOs have established systems and proecsses to implement changes and undergo annual assessments from GFSI. 3. When the new version of the GFSI benchmarking requirements get rolled out the facilities do not want to participate in those initial audits because they will not have the GFSI recognition. It would be a much more fluid process for the facilities if this assessment could be covered under the continued recognition classification.	Opportunity Identified
CPO 4	Part I	5	Key procedural steps		Consider allowing re-application within less than 12-month period, where the CPO implemented the required actions Question on the number 10 as the required number of certificates (need tangible criteria for defining a threshold) Use more concise descriptions of the steps (bullet points, flowcharts or diagrams to visually represent the procedural steps) This can help readers quickly understand the process flow and the relationships between different steps Maintain a uniform structure for each procedural step. Start each section with a brief overview, followed by detailed steps Provide more context or examples where necessary. Explain why certain steps are important or what the implications are if they are not followed correctly. Include real-world examples or case studies to illustrate the application of these steps Include a section on common issues or FAQs that might arise during the procedural steps, along with solutions or best practices Highlight any critical compliance or legal requirements associated with each procedural step. This can prevent potential oversights that may have legal implication	Agree with WG comments.	Opportunity Identified
CPO 4	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Preventive action is not defined in the BM or used elsewhere in the BM, therefore cannot just be added here. It is not appropiate for CPO level. Suggest keeping current wording.	Agree

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part I	5	Key procedural steps	A => Application		in the year prior to publication of a new version of the GFSI benchmarking requirements, no new application will be accepted. A notice will be displayed on the GFSI website to indicate the starting date of this one-year period, and existing GFSI recognized CPOs will be informed in writing/via email	Opportunity Identified
CPO 4	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		It appears that this has changed from 'GFSI Board Final Decision and Communication' to 'GFSI final recognition decision and communication'. The role of the GFSI Steering Committee and the GFSI Technical Sub committee in the decision-making process needs to be clarified.	Misunderstood
CPO 4	Part I	5	Key procedural steps	C => Office visit		If the initial date proposed by the BML is not suitable for the CPO they should be able to suggest a mutually convenient date.	Agree
CPO 4	Part I	5	Key procedural steps	E => Stakeholder consultation		GFSI employees, contractors or committee members should not be permitted to provide comment as part of the Stakeholder consultation.	Misunderstood
CPO 4	Part I	5	Key procedural steps	H => Annual Monitoring of continued alignment		Further clarification needed of what this step involves.	Misunderstood
CPO 4	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Submitting appeals to the GFSI Executive Director in the case of appealing a decision by the GFSI Executive Director is not impartial. An alternative option shall be available in this case. 30 working days?	Misunderstood
CPO 4	Part I	6	Sanctioning		*Standalone escalation process to be described - flow diagram*	agree with WG comment.	Opportunity Identified
CPO 4	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	we agree with the first paragraph about appeals commiittee being independent. The number and expertise of appeal committee members should be influenced by each indivdual appeal and consider regional influences, and representive of the market the CPO operates.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time for stakeholder communication plan, prior to the suspension being published on the GFSI website	Agree
CPO 4	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		Sanction process must be more transparent, with dates of how long it will take, when it starts, dates agreed in advance, outcomes of meetings communicated to the CPO privately in advance before it is public knowledge, details of who is present at each meeting, timelines, actions and expected required outcomes, and the CPO should be kept informed throughout. Notification such that the CPO has time to create a communication plan in advance of public announcement. Sanction process should be transparent including the escalation process including what would initiate a sanction and the timelines involved. A definition is needed for non-alignment as its not in current glossary;CPO - Non conformance response GFSI - CAP review GFSI - CAP feedback or acceptance CPO - Final CAP response GFSI - Assessment (communication to CPO at least 7 days prior to Non-Alignment communication) GFSI - Non-Alignment Communication	Couldn't reach consensus
CPO 4	Part I	6	Sanctioning	If further investigation is required, the GFSI Technical Manager will promptly contact the Certification Programme Owner. The GFSI Technical Manager will fully document the process of investigation. Based on their findings, the GFSI Technical Manager will make a recommendation to either: 1. take no action against the Certification Programme Owner, or 2. maintain recognition and require evidence of realignment, or 3. suspend recognition, or 4. withdraw recognition.		should there be a timeline for this process - a max time for decisions to be made and communicated	Couldn't reach consensus
CPO 4	Part I	6	Sanctioning	This recommendation is passed to the GFSI Executive Director and the GFSI Board for final decision. The GFSI Technical Manager will inform the Certification Programme Owner of this final decision, including a full explanation for it.		to ensure objectivity the final decision-makers with the GFSI Board/Steering committee should not be aware of which scheme owner is being assessed. Ie the scheme should be annonymous.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part I	6	Sanctioning	In the event that the GFSI Board is not satisfied with the progress made, they may suspend the recognition of the Certification Programme.		It needs to be clear that suspension of recognition of a CPO programme is NOT the same as suspension of a CPO, i.e. impacting all the CPO's benchmarked programmes. The CPO remains a GFSI benchmarked CPO in the scenario described in section 6.	Couldn't reach consensus
CPO 4	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		The CPO shall be informed in writing in the case of withdrawal, prior to the withdrawal being published on the GFSI website	Agree
CPO 4	Part I	6	Sanctioning	In the event that GFSI recognition is withdrawn, GFSI shall issue a news release and the GFSI website shall clearly specify the details and conditions of the withdrawal.		How is this communicated to the CPO - if under appeal? is the notification on the GFSI website held off until the outcome of the appeal?	Misunderstood
CPO 4	Part I	6	Sanctioning	The Certification Programme Owner has the right to appeal against any decision made by the GFSI Board, the GFSI Executive Director or any person contracted to GFSI in relation to the Benchmarking Process.		Steering Committee , not GFSI Board? It needs to be emphasised that the CPO has a right to appeal against the DECISION TO SUSPEND in the first place, and not just the consequences of the decision, proposed actions and timelines.	Misunderstood
CPO 4	Part I	6	Sanctioning	The decision of the Appeals Committee is final. Once the final decision is given, the appeal process will be closed and the GFSI website updated accordingly.		The conclusion of the appeal should be communicated to the CPO at a minium 3 working days in advance before it is publically communicated.	Couldn't reach consensus
CPO 4	Part I	6	Sanctioning	If the GFSI Board considers that a period of suspension of recognition shall be imposed, the GFSI website shall clearly specify the details and conditions of the suspension.			Misunderstood
CPO 4	Part I	6	Sanctioning	The Certification Programme Owner shall confirm to the GFSI Board that these remediation conditions can be achieved within the timescales set out by the GFSI Board, when evidence of the implementation of the corrective actions will be expected, and alignment to the GFSI Benchmarking Requirements can be reestablished.			Misunderstood
CPO 4	Part I	4	Methodology	GFSI Board	GFSI Steering Committee	as above for members that have an influence on benchark recognition	Misunderstood
CPO 4	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	Is this comment in the wrong place? is section 3 continued recognition?	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	Agree with the recommendation for witness auditing with the exception of F2 scope which has no onsite requirement. It should be for CPOs to define when ICT can/cannot be used for witness assessments.	Opportunity Identified
CPO 4	Part II	4.10.2	Initial Auditor Qualification	The Certification Programme Owner shall ensure that the witness audit(s) carried out as part of the certification body's initial auditor qualification follows the standard audit plan agreed with the certified organisation, including the use of ICT if applicable, as long as this does not compromise the effectiveness of the assessment. The Certification Programme Owner shall ensure that the witness assessor is present on site for parts of the audit carried out on site.	Suggest to introduce a distinction for 1st approval where the entire witness audit should be conducted on site (no permitted use of ICT).	**Disagree with the WG comment because the initial witness audit can be completed as part of a blended audit. This requirement is not applicatble if included for F2 scope.**	Opportunity Identified
CPO 4	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	1. Agree with WG comment wrt ICT use. 2. Add the definition of sector. 3. suggest one witness only for sector extension and assessment of the auditor in just one audit including witness.	Opportunity Identified
CPO 4	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Disagree with the change proposed by WG because the aim of this is to ensure the auditors have familiarity with the CPO Standards.Suggest to change to 3 against the relevant GFSI CPO; WG comment is contradictory to 4.15	Couldn't reach consensus
CPO 4	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	we recommend that the WG comment is aplicable to AI, AII, BI, BII, **Not BIII.**	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	disagree with WG suggestion- The GFSI logo/reference should not appear on the certificate. For example a certificate is issued against a recognised programme, but the programme is subsequently withdrawn/suspended the certificates cannot be retrospecively updated by a CPO. Certificates are issued by the CB, not the CPO. This would add further complexity to the system, and confusion. Aan e solution is different to a certificate.	Couldn't reach consensus
CPO 4	Part II	5.34	Use of ICT during the audit	The CPO shall specify the maximum period of time between the beginning and the end of all audit activities included in the audit duration to maintain the audit efficiency and integrity. That period of time shall not exceed 30 days.		Clarify that the 30 day timeline refers to a single audit being carried out, and does not apply to the timeline between the sites in a multi-site certification.	Couldn't reach consensus
CPO 4	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.		ownership definition needs to align with Part 1 as they are not consistent.	Couldn't reach consensus
CPO 4	Part II	1.6	Product Labelling	The Certification Programme Owner shall not allow products produced under the conforming Certification Programme to be labelled, marked or described in any manner which implies they meet specific food safety criteria.		recommend this is clarified as it refers to consumer facing products.	Couldn't reach consensus
CPO 4	Part II	1.10	Certification Programme Development and Maintenance	The Certification Programme shall be subjected to extensive stakeholder consultation during its development.		- need to clarify "extensive" . does this infer a public consultation? extensive opportunity to input feedback? - what if very few people respond? is that still extensive?	Opportunity Identified
CPO 4	Part II	1.11	Certification Programme Development and Maintenance	The consultation period shall allow sufficient time for stakeholders to review the Certification Programme under development and send their comments to the Certification Programme Owner.		what is sufficient time? define this and specify clearly the time expected if GFSI have an expectation.	Opportunity Identified
CPO 4	Part II	1.16	Certification Programme Development and Maintenance	The Certification Programme Owner shall inform key stakeholders, including GFSI, of any changes to the Certification Programme, in particular those changes that are relevant to the recognition status of the Certification Programme.		clarify/define changes in this context. At what stage should this be done in the change process?	Couldn't reach consensus
CPO 4	Part II	2.6	Relationship with Accreditation Bodies	The Certification Programme Owner shall have an agreement with the Accreditation Bodies to ensure that the Certification Programme Owner is informed if a Certification Body has its accreditation withdrawn or suspended.		CPOs have an agreement with CBs, not ABs. Suggest to make it a requirement of CBs to inform CPOs if their accreditation is withdrawn or suspended?	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part II	2.9	Relationship with Accreditation Bodies	The Certification Programme Owner shall agree on their process for the extension of the scope of activities of Certification Bodies with the Accreditation Bodies.		CPO's to set the requirement for scope extension for CBs. Accreditation process needs to be agreed between the CB and AB.	Opportunity Identified
CPO 4	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.		NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011: it is not possible for a CPO to demonstrate this level of conformance. Remove this last part of the element. We can require that they are members of the IAF - but if they do not agree with the MLA, they can still perform their own review under IAF MD 25	Agree
CPO 4	Part II	2.14	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies shall be publicly available and precisely defined in terms of the exact name of the Certification Programme in scope, its revision number and / or date and its sector of application reference (e.g. industry sector).		Suggest changing to 'the CPO shall request' as the CPO contract is with the CB and not the AB. it is covered in line 41 where the CPO requires this from the CB. So line 40 could be deleted altogether or clarify where this needs to be posted. Would not add this as it would restrict way of working , what and where something is publically available is open to interpretation.	Couldn't reach consensus
CPO 4	Part II	2.16	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the accreditation standard used by all Accreditation Bodies for their Certification Programme is consistent and, where appropriate, facilitates a harmonised agreement on behalf of the contracted Certification Bodies.		CPOs cannot dictate set requirements for ABs. Having these ABs under the umbrella of IAF gives confidence of their consistency.	Opportunity Identified
CPO 4	Part II	2.17	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies seeking accreditation for the Certification Programme shall be accredited within 12 months from the date of application to an Accreditation Body.		To consider change to "12 months from the date of the first audit" as the CB cannot progress with accreditation activities until there is a sufficient number of clients	Couldn't reach consensus
CPO 4	Part II	2.21	Accreditation of Certification Bodies	In the event that the range of certification services offered by a Certification Body is wider than those accredited, the Certification Programme Owner shall ensure that those are transparent, not conflicting and distinguished from those that are accredited.		CPOs can set up the requirements for CBs to comply with requirement.	Opportunity Identified
CPO 4	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		There needs to be an implementation/transition period of up to 18 months for the current version of the IAF MD4, IAF MD1, Codex, etc Referring to the "current version" needs to be reviewed as it implies instant implementation expected.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		This is covered by the AB assessment and therefore is perceived as duplication of work by the CPOs. However if it must remain in then we suggest it is changed to: The Certification Programme Owner shall ensure that a designed Certification Body employee is responsible for comunication between CPO and the CB employee/team responsible responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.	Couldn't reach consensus
CPO 4	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Remove: "at all times" or reword	Couldn't reach consensus
CPO 4	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Agreed but suggest modification to the word food safety breakout to Food safety incident and define " disrepute" in glossary. Some criteria and guidance will ensure that all CPOs work in the same way and it is transparent. e.g. 1) What situations would bring the CPO or GFSI into disrepute 2) What is the process for informing the CPO 3) What is the process for the CPO informing GFSI 4) Timelines	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		Remove product recalls from the list of risk factors as recalls by a Country of origin is not a metric linked to the performance of a CB	Opportunity Identified
CPO 4	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	The WG comment is not relevant under this clause. This is in relation to the CPOs monitoring the CB KPIs. In addition to above comment, we highlight that we have no concerns with publishing this information - it is already available on the BRCGS Directory. However, we do not think it should be added to the GFSI website as this would result in several ratings for each CB, which may not be comparable if assessed to different criteria by different CPO. It would lead to confusion.	Couldn't reach consensus
CPO 4	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.	this is quite vague... what constitutes incompetence?	The CPO can set up the requirements for personnel involved in auditing and certification decision. However, the CBs is responsible to comply to these requirements when hiring and assigning the tasks.	Couldn't reach consensus
CPO 4	Part II	4.2	Certification Body Personnel Competence	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: - Complying with the rules of the Certification Body, with particular reference to confidentiality and independence from commercial or personal interests; - Declaring any issues in relation to personal conflicts of interest.		The CPO can set up the requirements for personnel involved in auditing and certification decision. However, complying to these requirements is a responsibility of the CB hiring the people , In some geographies, contractual information is considered confidential.	Couldn't reach consensus
CPO 4	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		same as above as is a duplication of accreditation requirements and therefore should be removed. Recommend change word for example" the CPO shall define the normative documents which CB personnel need to be trainined in, which may include 17065/17021 as required, in addition any auditors undertaking remote auditing require IAF MD4 training."	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part II	4.4	Certification Body Personnel Competence	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: - Name and address 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).		CPOs can set up the requirements for CBs. It is the responsibility of CBs to retain these records.	Misunderstood
CPO 4	Part II	4.5	Certification Body Personnel Competence: Certification Personnel	The Certification Programme Owner shall ensure that Certification Body's competence requirement for the personnel carrying out the technical review include understanding of the Certification Programme's normative documents and of the Certification Programme's requirements on the completion of audit's report and checklist.		same as above	Misunderstood
CPO 4	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	Remove examples and leave only the first part of the element content up to: as specified by the CPO, and include that auditor performance includes the evaluation of soft skills.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	The CPO can set up the requirements for personnel involved in auditing and certification decision. However, complying to these requirements is a responsibility of the CB hiring the people. The option should be provided for the auditors to extend the approval scope through the audit experience (number of audits in product category) and additional competency assessments/exams. Suggest retain "quality assurance" as is, i.e. do not delete quality assurance as this may apply to other sectors . Should include reference to GFSI auditor training and professional development framework as it has not been approved/completed. It is therefore not possible to determine whether this is suitable in this public consultation	Opportunity Identified
CPO 4	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		remove empasis on the specific education degree qualification requirements - Education can be included in the auditor qualification however need to allow fexibility to consider relevant industry experience .	Opportunity Identified
CPO 4	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Disagree with the comment in red as it is not clear what is meant by this.	Opportunity Identified
CPO 4	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	leave requirement as is - relevant laws is sufficient.Country of Sale will not always be known in advance of the audit.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Having a "type" of non-conformity is not a requirement. Change to where the integrity of the certification could be at risk as determined by the CPO.	Couldn't reach consensus
CPO 4	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	agree.	Couldn't reach consensus
CPO 4	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Disagree with WG member comments - no version of the audit report should be released except at the discretion of the contracted organisation, it would be unacceptable to say it was released because it was only a draft.	Couldn't reach consensus
CPO 4	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Agree with WG member recommendation about glossary addition.	Opportunity Identified
CPO 4	Part II	5.31	Use of ICT during the audit	With the exception of audits under the scope of recognition "FII - Broker", At least part of the annual full audit shall be carried out on site.		Include an allowance for full remote audits in the case of serious event, e.g. force majeure, war, pandemic, etc.	Couldn't reach consensus
CPO 4	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	we agree in principle, as a clear distinction is needed and doesn't exist at the moment. However, we cannot really comment until the draft text is made available for comment.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	"The certificate shall only be issued to the multi-site organization, not individual sites, as this is in contradiction to the accreditation requirements. In terms of a multi-site - the central function is responsible and HO terminology should not be introduced here."	Agree
CPO 4	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.			Opportunity Identified
CPO 4	Part II	5.19	Audit Reporting	The Certification Programme Owner shall ensure that necessary agreements are in place with the audited organisations and the Certification Bodies so that the audit records are available on request to the Certification Programme Owner and to GFSI.			Misunderstood
CPO 4	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.		Misunderstood
CPO 4	Part III FSMS	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.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements	Couldn't reach consensus
CPO 4	Part III FSMS	1.2	Management responsibility	A clear organisational structure identifying the job functions and responsibilities of at least those employees whose activities affect Hygienic Design shall be established, implemented and maintained.		As with comments made in Part III HACCP this requirement is only relevant to scopes JI and it would not be acceptable to add it to the other scopes.	Opportunity Identified
CPO 4	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	As with Part III HACCP comments - the term 'latest version' needs a system of change management as a change to a Codex document cannot immediately be incorporated into the Standards - the benchmark needs to be clear on what it is trying to achieve - this requirment is about a site's senior management commitment, the evidence of that it built into the site's processes as defined elsewhere in this benchmark, therefore this addition doesn't add value.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part III FSMS	2.2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Hygienic Design Management System shall be provided.		as with previous comments this would only be appropriate to scopes JI and JII. It is not acceptable to add to other scopes.	Opportunity Identified
CPO 4	Part III FSMS	3.2	Management review	The organisation's senior management shall review the verification of the Hygienic Design System at planned intervals, to ensure their continuing suitability, adequacy and effectiveness.		as with previous comments this would only be appropriate to scopes JI. It is not acceptable to add to other scopes.	Opportunity Identified
CPO 4	Part III FSMS	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).		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements	Couldn't reach consensus
CPO 4	Part III FSMS	4.3	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements	Opportunity Identified
CPO 4	Part III FSMS	4.4	Legislation	Procedures shall be established, implemented and maintained to ensure that buildings and equipment are legally compliant in the hygienic design requirements in the country of known implementation / sale.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements	Opportunity Identified
CPO 4	Part III FSMS	5.2	Hygienic Design Management System	A Hygienic Design Management System shall be established, implemented, maintained and continuously improved.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements	Opportunity Identified
CPO 4	Part III FSMS	6.2	Hygienic Design Policy	A clear, concise and documented Hygienic Design policy statement shall be in place, as well as measurable objectives specifying the organisation's commitments to meet the food safety needs of its products		as with previous comments this would only be appropriate to scopes JI. It is not acceptable to add to other scopes.	Opportunity Identified
CPO 4	Part III FSMS	8.1	Food fraud	A food fraud vulnerability assessment procedure shall be established, implemented and maintained to identify potential vulnerability and prioritise food fraud mitigation measures.		could include - ' identify potential vulnerabilities in the supply chain...' it would then cover suppliers	Couldn't reach consensus
CPO 4	Part III FSMS	9.2.1	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the food if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.		How should this clause be used with long shelf life products e.g. wine or tin cans?	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	The term scientific principles isn't clear in this context and would consequently lead to differences in application. If the WG wish to update the requirement to meet the revised Codex document then we agree with that principle but recommend alternative, clearer wording. e.g. CXC 1-1969 uses SHOULD not SHALL. Where microbiological, physical, chemical and allergen specifications are used for food safety or suitability, such specifications should be based on sound scientific principles and state, where appropriate, samplingparameters, analytical methods, acceptable limits, and monitoring procedures. Suggestion: Specified requirements or specifications shall be established, implemented and maitained for all inputs to the process, including services that are purchased or provided and have an effect on food safety. Specifications should be based on sound scientific principles.	Couldn't reach consensus
CPO 4	Part III FSMS	10.3	Specified requirements / Specifications	The Food Safety Management System shall ensure that packaging used to impart or provide a functional effect on the safety of the food to be packed in this packaging, such as shelf life extension shall, where known, be effective within its own specified criteria.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements	Opportunity Identified
CPO 4	Part III FSMS	10.4	Specified requirements / Specifications	There shall be sufficient data to ensure food contact with the packaging is safe, and sufficient documentation of claims, according to the intended use, where recycled material, plant based material or functional additives are used.		Again a lack of clarity regarding which scopes this applies to - it would be too little for Food Manufacturing scopes, but too much for FII and G.	Opportunity Identified
CPO 4	Part III FSMS	13.1.1	Purchasing and supplier performance	Purchasing processes shall be controlled to ensure 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.		The reason for the difference between 13.1.1 and 13.1.2 is not clear. For other parts of the benchmark we have a single requirement which requires either a process or a procedure not separate clauses for both. Recommend that these are consolidated into a signle clause to provide clarity on the intension.	Couldn't reach consensus
CPO 4	Part III FSMS	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.		The reason for the difference between 13.1.1 and 13.1.2 is not clear. For other parts of the benchmark we have a single requirement which requires either a process or a procedure not separate clauses for both. Recommend that these are consolidated into a signle clause to provide clarity on the intension.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	1) The intension of the WG member amendment isnt clear and is therefore unlikely to be effective. 2) 'As per' is unlikely translate, leading to poor understanding of the requirement. The term 'based on' is of greater value. 3) There is a problem with this clause relating to emergency purchases - if its an emergency purchase, then there won't be a full supplier approval, in the way that is normaaly used by that organisation. 4) Recommend supplier approval is clearly based on a raw material risk assessment	Couldn't reach consensus
CPO 4	Part III FSMS	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).		Suggest adding for clarity...procedures shall be established, implemented and maintained to ensure product (finished product, raw materials , work in progress, and packaging) identification from the supplier (min one step back) and any processes undertakne to the recipient of the food. Traceability of all raw materials and packaging. or similar as often packaging traceability is not completed effectively.	Couldn't reach consensus
CPO 4	Part III FSMS	14.1.5	Traceability	Procedures shall be established, implemented and maintained to ensure the ability to trace or follow a material or article critical to food safety through all stages of purchase, construction and distribution (minimum one step forward and one step backward).		can we clarify this includes packaging .	Misunderstood
CPO 4	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	'where possible' is problematic from an auditing point of view - GFSI would need to define what is possible. All these requirements refer to "implemented controls" . Would recommend this is changed to "control measures" .	Couldn't reach consensus
CPO 4	Part III FSMS	16.2	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.	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.	As with previous comments - it is unclear which scopes 16.1 and 16.2 will apply to. There is a lot of overlap between the clauses. Change to "control measures"	Couldn't reach consensus
CPO 4	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Agree but GFSI must highlight that it will be most relevent to scopes with open product. G, F1 & F2 are much less implicated (likewise with primary scopes). if the addition is being made it should be both validation and verification.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part III FSMS	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.	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 - add intended consumption as well?	Disagree with WG member amendment - - a food manufacture rarely knows where its customers will sell their products - they only have visibility of where they themselves are selling it. However the manufacturer has a responsibility to ensure accurate labelling so the customer has all the necessary information (e.g. cooking instructions) to use the product correctly/consume the product safely. include reference to "intended" use instead of sale?	Couldn't reach consensus
CPO 4	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	Agree but need to clarify which scopes are incled in this scope. Suggest to include in manufacturing scopes.	Opportunity Identified
CPO 4	Part III FSMS	19.1	Testing	A procedure shall be established, implemented and maintained to ensure that analyses of food parameters critical to food safety are undertaken by competent laboratories and using appropriate sampling and testing methods and that such analyses are performed in accordance with the applicable requirements of ISO/IEC 17025.		Suggest to remove 17025 and apply the GFSI definition of competent laboratory. Challenge is that for some laboratories, such as government laboratories, 17025 is not able to be verfied.	Couldn't reach consensus
CPO 4	Part III FSMS	19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		The difference between 19.2/19.3 is presumably related to different scopes, but the absence of this information makes it difficult to comment on the suitability of the requirements.	Opportunity Identified
CPO 4	Part III FSMS	19.3	Environmental monitoring	A risk-based approach shall be in place to define the environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		are scopes D & K included in this?	Opportunity Identified
CPO 4	Part III FSMS	19.5	Testing	Where in-house testing is carried out, calibration of equipment that is critical to food safety shall be carried out against national standards or other accurate means.		Suggest adding …to ensure accuracy and precision of data or results. Can you clarify which scopes this caluse is applicable to?	Opportunity Identified
CPO 4	Part III FSMS	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.		it is unclear why there are 2 requirements labelled 22. The second of these doesn't include product recall.	Misunderstood
CPO 4	Part III FSMS	22	Serious incident management	An incident management procedure, including product withdrawal, shall be established, implemented and maintained. Withdrawal procedure shall be regularly tested for effectiveness.		need clarification why both of these are separate - can they be combined?	Misunderstood
CPO 4	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	It is unclear what value this will add as a separate requirement - suggest that it is added to 26 which it overlaps with. Change management procedures are referenced in a number of clauses already . E.g. supplier approval.. Where planned/unplanned is mentioned...	Couldn't reach consensus
CPO 4	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 4	Part III GMP	4.8	Product contamination risk and segregation	Suitable employee, contractor and visitor access requirements shall be in place such that food safety is not compromised if construction is undertaken at a site in which food is being handled.		- if intended for all scopes it would be better combined with other access requirements in the benchmark.	Opportunity Identified
CPO 4	Part III GMP	4.9	Product contamination risk and segregation	Procedures shall be in place to prevent the cross-contamination of food from hazards created by construction activities if construction is undertaken at a site in which food is being handled.		As above	Misunderstood
CPO 4	Part III GMP	4.10	Product contamination risk and segregation	Prior to building commissioning or equipment dispatch, buildings / equipment shall be cleaned by the manufacturer / constructor using appropriate methods that will remove all food safety hazards associated with the construction process. Cleaning should be recorded and verified.		As above	Opportunity Identified
CPO 4	Part III GMP	7.2	Training	Procedures shall be established, implemented and maintained to ensure all employees and contractors involved in building and equipment evaluation, specification, purchase and hygienic design shall be trained in hygienic design principles appropriate to their tasks and to the hygienic design requirements of the building or equipment for its intended use.		is this only applicable to certain scopes? It appears to be very specific about hygienic design which will only be relevant to certain scopes.	Opportunity Identified
CPO 4	Part III GMP	7.3	Training	Procedure shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	Procedures shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	As above	Misunderstood
CPO 4	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Clarify what is meant be new wording.	Couldn't reach consensus
CPO 4	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	Ingredient is not defined in the glossary, so shouldn't be used here without a glossary definition. Also note that potable water on raw materials isn't always potable e.g. raw fish is often washed with salt water during catch and prior to filleting. There may also be examples in fresh produce for removing soil.	Opportunity Identified
CPO 4	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Recommend to eliminate the additional language. The added wording is too prescriptive and doesn't allow for regional differences in terminology and risk.	Agree
CPO 4	Part III GMP	15.2	Transport	Manufactured equipment shall be stored and transported to the final customer in a manner that prevents contamination of the equipment which may affect food safety.		Presumably only relevant to certain scopes? Which ones?	Opportunity Identified
CPO 4	Part III GMP	17	Stock management	A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.		this is not applicable to the BIII scope.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Agree. The bencmark should either list all of the hazard types or none of them.	Opportunity Identified
CPO 4	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	There must be a system of change management for external references. Changes to an external reference documents (including Codex, ISO 22000, ISO17065, IAF MD4, etc) cannot instantly be incorporated into a Standard. For significant changes PART II of the GFSI benchmark applies e.g. that there is a suitable period of consultation of proposed changes. This process takes time, however, the WG member comment would immediately render all schemes non-compliant with the benchmark until the process was complete. We recommend that PART II of the benchmark includes this change management e.g. within 12 months of the publication of a new version of the Codex principles (or other relevant text). N.B. 'as per' is unlikely to be understood in all languages. Recommend changing to 'based on' which is the term used in 1.1.2.	Opportunity Identified
CPO 4	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	There must be a system of change management for external references. Changes to an external reference documents (including Codex, ISO 22000, ISO17065, IAF MD4, etc) cannot instantly be incorporated into a Standard. For significant changes PART II of the GFSI benchmark applies e.g. that there is a suitable period of consultation of proposed changes. This process takes time, however, the WG member comment would immediately render all schemes non-compliant with the benchmark until the process was complete. We recommend that PART II of the benchmark includes this change management e.g. within 12 months of the publication of a new version of the Codex principles (or other relevant text). N.B. 'as per' is unlikely to be understood in all languages. Recommend changing to 'based on' which is the term used in 1.1.2.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	include the term **"Significant food safety hazards**" --> those hazards are those that requires control measures (CCP's - CP's/OPPR's). Definition required: As definition: significant food safety hazard food safety hazard, identified through the hazard assessment, which needs to be controlled bycontrol measures. Also recommended to include the following definitions under **PART IV GLossary:** Food Safety Hazard and Significant Food Safety Hazard in order to provide clarification	Opportunity Identified
CPO 4	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	To include also food safety incidents, not only emergency	Opportunity Identified
CPO 4	Part III HACCP	1.5	Hygienic design process	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new buildings/equipment.	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade or improvements.	It is not clear from the benchmark proposal which scopes this requirement refers to - i am assuming it refers to scopes J1& J2 - in which case my comment below stands. Agree it is correct for new buildings and new equipment however the practicality and cost of significant changes to existing buildings and equipment could potentially be a barrier for some stakeholders to use these scopes.	Opportunity Identified
CPO 4	Part III HACCP	1.6	Hygienic design process	The hygienic design and suitability of buildings and equipment shall be evaluated throughout their life cycle from the design concept, through construction, purchasing and during use, until the end of their intended life.	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.	It is not clear from the benchmark proposal which scopes this requirement refers to - i am assuming it refers to scopes J1& J2 - in which case my comment below stands. Agree it is correct for new buildings and new equipment however the practicality and cost of significant changes to existing buildings and equipment could potentially be a barrier for some stakeholders to use these scopes.	Opportunity Identified
CPO 4	Part III HACCP	1.7	Risk assessment	A documented hygienic design risk assessment for food safety hazards on new and existing buildings/equipment shall be established, implemented and maintained. It shall include as a minimum the following considerations: intended use, food safety hazard identification, evaluation.		It is unclear which scopes will use which of the clauses referencing hygienic design making constructive feedback more challenging than it should be. If restricted to scopes JI and JII then they may be acceptable, but as detailed above they will not be acceptable if added to other scopes. This applies to all benchmark elements from 1.5 to 1.17.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part III HACCP	1.8	Risk assessment	The hygienic design risk assessment shall be reviewed when any change to the building/equipment/product/process is made or other hazards arise, or at a minimum frequency defined by applicable laws and regulations.			Opportunity Identified
CPO 4	Part III HACCP	1.9.1	Intended use	The intended use of the building/equipment shall be specified.			Opportunity Identified
CPO 4	Part III HACCP	1.9.2	Intended use	The intended use of the building/equipment shall be described, as a specification for the intended purchase of new buildings and equipment.			Opportunity Identified
CPO 4	Part III HACCP	1.10	Hygienic design principles	Appropriate building/equipment hygienic design principles shall be adopted based on the designated risk assessment, appropriate to their intended use and taking into consideration a user specification.			Opportunity Identified
CPO 4	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.		Agree
CPO 4	Part III HACCP	1.12	Hygienic design principles	Buildings and equipment shall be designed and constructed to avoid favourable growth conditions (for microorganisms, pests and their harbourage), appropriate to their intended use.			Opportunity Identified
CPO 4	Part III HACCP	1.13	Hygienic design principles	Buildings and equipment shall be designed to prevent contamination, appropriate to their intended use.			Opportunity Identified
CPO 4	Part III HACCP	1.14	Hygienic design principles	Wherever relevant, recognised hygienic design standards/guidance shall be consulted for the design and construction of buildings and equipment, appropriate for their intended use.			Opportunity Identified
CPO 4	Part III HACCP	1.15	Hygienic design principles	Appropriate hygienic design principles shall be adopted for the installation of new equipment and construction of buildings at sites handling food.			Opportunity Identified
CPO 4	Part III HACCP	1.16	Hygienic design principles	Hygienic design principles shall be adopted to ensure the maintenance of the hygienic performance of the buildings/equipment, appropriate for their intended use.			Opportunity Identified
CPO 4	Part III HACCP	1.17	Hygienic design mitigation	Appropriate measures (with frequencies) shall be specified, undertaken accordingly and documented to mitigate any remaining food safety risks identified in the hygienic design risk assessment following building/equipment construction, purchase and installation.			Opportunity Identified
CPO 4	Part IV Glossary	Glossary	Audit	Systematic, independent and documented process for obtaining objective evidence and evaluating it objectively to determine the extent to which the audit criteria are fulfilled.	ISO/ IEC 19011 ISO/ IEC 9000	Definition needed for unannounced audit.	Agree
CPO 4	Part IV Glossary	Glossary	Central function	An identified central department (but not necessarily the headquarters of the organisation) which has the responsibility to plan, control and manage the organisation's food safety management system. Note: this could also be an organisation which is employed by or is a subsidiary of a larger organisation.		need a different definition for Head office /central function	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 4	Part IV Glossary	Glossary	Consultancy	Participation in: - designing, implementing or maintaining a management system, for instance a) preparing or producing manuals or procedures, and b) giving specific advice, instructions or solutions towards the development and implementation of a management system; - designing, manufacturing, installing, maintaining or distributing of a certified product or a product to be certified, or; - designing, implementing, operating or maintaining of a certified process or a process to be certified, or; - designing, implementing, providing or maintaining of a certified service or a service to be certified. Note: Arranging training and participating as a trainer is not considered as consultancy, provided that, where the course relates to management systems or auditing, it is confined to the provision of generic information that is freely available in the public domain; i.e. the trainer does not provide company-specific solutions.	ISO / IEC 17065 ISO / IEC 17021-1	include in definition reference to webinars about the scheme, sharing information relating to non- conformity trends as being acceptable to be provided in the CPO	Agree
CPO 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	"key personnel involved/supporting the programme implementation"should be removed.	Opportunity Identified
CPO 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Please relax the "ten valid accredited certificates" requirement.	Agree
CPO 5	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Please change "within 9 months of its date of publication" to "within 12 months of its date of publication."	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 5	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	We support comment from WG.	Agree
CPO 5	Part II	1.6	Product Labelling	The Certification Programme Owner shall not allow products produced under the conforming Certification Programme to be labelled, marked or described in any manner which implies they meet specific food safety criteria.		In product certification, products should be able to be labeled.	Misunderstood
CPO 5	Part II	3.10	Integrity Programme	The Certification Programme Owner shall implement a risk-based programme to monitor and regularly review the performance of Certification Bodies, and their compliance to the Certification Programme's requirements. This programme shall consider the number, size and complexity of audits carried out by the Certification Bodies.		The division of roles between accreditation body and CPO should be clarified regarding the monitoring of certification bodies.	Opportunity Identified
CPO 5	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	The results of monitoring of certification bodies should not be made public.	Couldn't reach consensus
CPO 5	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	We support the comment from the WG.	Opportunity Identified
CPO 5	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	If a food safety auditor is already approved for auditing GFSI-recognised Certification Programmes, only one witness audit against the specific Certification Programme is needed.	Opportunity Identified
CPO 5	Part II	4.10.2	Initial Auditor Qualification	The Certification Programme Owner shall ensure that the witness audit(s) carried out as part of the certification body's initial auditor qualification follows the standard audit plan agreed with the certified organisation, including the use of ICT if applicable, as long as this does not compromise the effectiveness of the assessment. The Certification Programme Owner shall ensure that the witness assessor is present on site for parts of the audit carried out on site.	Suggest to introduce a distinction for 1st approval where the entire witness audit should be conducted on site (no permitted use of ICT).	ICT should be allowed for document review.	Opportunity Identified
CPO 5	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Do not include "for the country of sale of goods."	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 5	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	We support the comment from the WG.	Opportunity Identified
CPO 5	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	This element should continue to not apply to the scope B.	Opportunity Identified
CPO 5	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.		Couldn't reach consensus
CPO 5	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	We support comment from WG.	Opportunity Identified
CPO 5	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.	We support comment from WG.	Agree
CPO 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	2 CBs is acceptable. Multiple CBs participating within a program demonstrates an ability for the CPO to govern their scheme. While there is a potential risk for a monopoly, I think there is a greater risk or potential for a new CPO to have a limited ability to control their scheme if only 1 CB is allowed as they become more financially tied to the one CB.	Agree
CPO 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	The current language is very subjective because significant change is note defined. Additionally, the red font seems a bit subjective as well if an organizatino is a non-profit because board members change on a regular basis. I would suggest that significant changes within the organization are taken under consideration by GFSI and based on data outcomes (program changes, compliance assessments, etc.).	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Agree with WG comments - the process for new and existing CPOs shall not be the same. Remove 12 months operation for existing benchmarked CPOs; for new versions of a currently recognised programme, only need to prove that new version of the Scheme complies	Agree
CPO 6	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.		Couldn't reach consensus
CPO 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	The 12 month requirement seem duplicative to row 11 that states - The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organizations. Suggest changing the eligibility criteria for recognized programs so that GFSI can perform a **continued recognition** assessment of an existing GFSI recognized programs (in good standing) to the new requirements prior to implementation. These continued recognition assessments should cover both part II and part III with the goal of making the audit transition for participating facilities much more fluid. If this could occur the recognized CPOs would be able to implement the required changes, the CBs would be able to update their accreditation to the new program version, and the facilities would not need to go through duplicative audits because the initial audits would be benchmarked recognized to the updated version of the program. Facilities do not want to go through an audit that isn't to a GFSI benchmarked program because it won't have the same recognition	Misunderstood
CPO 6	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	Agree with WG comments - current scopes align with ISO 22003 The full application process should not apply to existing recognized CPOs -a re-benchmarking process should be in place, based on a GAP assessment and be defined under continued recognition	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		The full application process should not apply to existing recognized CPOs because they have established systems and processes. Additionally, full applications are very disruptive to manufacturers and retailers who are looking for GFSI recognized programs. A "continuing benchmarking process" , "progressing benchmarking process", or a "continuous improvment benchmarking process" should be in place for for recognized programs. This process could be based on a GAP assessment and be defined under continued recognition or another new assessment term. Having to demonstrate market demand by submitting 10 non-GFSI recognized certificates creates signifcant burdons for manufacturers who already have GFSI recognized certificates.	Couldn't reach consensus
CPO 6	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.	The full application process should not apply to existing recognized CPOs because they have established systems and processes. Additionally, full applications are very disruptive to manufacturers and retailers who are looking for GFSI recognized programs. A "continuing benchmarking process" , "progressing benchmark version/revision process", or a "continuous improvment benchmarking process" should be in place for for recognized programs. The fully benchmarked CPOs have established systems and processes to implement changes and undergo annual assessments from GFSI. When the new version of the GFSI benchmarking requirements get rolled out the facilities do not want to participate in those initial audits because they will not have the GFSI recognition. It would be a much more fluid process for the facilities if this assessment could be covered under the continued recognition classification or some other new assessment term.	Opportunity Identified
CPO 6	Part I	4	Methodology	Benchmark Leader	GFSI Benchmark Leader	Conflict of interest requirements should be defined and align with the current ISO principles, 2 years.	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part I	4	Methodology	GFSI Executive Director	GFSI Director	They may reassign the Benchmark Leader at any time, if properly justified and deemed necessary to do so, with sufficient notification to the CPO. The current workplan of the CPO shall not be negatively impacted as a result	Couldn't reach consensus
CPO 6	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	The application duration with the current process has several unintended and non-value added consequences for facilities that get compressed by this timeline. If a new assessment process is provided like "continuing benchmarking process" , "progressing benchmark version/revision process", or a "continuous improvment benchmarking process" for recognized programs this will provide an easier transition period for all within the GFSI value chain.	Opportunity Identified
CPO 6	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Corrective Action Plan or corrective action planning is appropriate for CPOs	Agree
CPO 6	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Steering Committee decision and communicating to the CPO. As an example the GFSI Steering Committee has up to 3 weeks to submit votes and if a majority is not reached by the end of the 3 weeks then the GFSI recommendation will be taken.	Couldn't reach consensus
CPO 6	Part I	5	Key procedural steps	A => Application			Opportunity Identified
CPO 6	Part I	5	Key procedural steps	B => Desktop Review/Self assessment			Opportunity Identified
CPO 6	Part I	5	Key procedural steps	E => Stakeholder consultation			Misunderstood

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Submission of an appeal to the GFSI executive director seems fine but this should triger an ability for the appeal to be reviewed a group of relevant stakeholders according to the specific case, selected from the ecoystem (Retailers, Accreditation Bodies, CPOs, etc.) not being involved in the decisions taken.	Misunderstood
CPO 6	Part I	6	Sanctioning		*Standalone escalation process to be described - flow diagram*	Sanction process should be transparent including the escalation process. Additionally, what would initiate a sanction and what are the timelines involved? A definition is needed for non-alignment because it is not in currently in the glossary and shoudl be different than the non-confromance. Potential non-alignment esculation process for sanctioning should include the following steps: oCPO - Non conformance response oGFSI - CAP review oGFSI - CAP feedback or acceptance oCPO - Final CAP response on any feedback oGFSI - Assessment (communication to CPO at least 7 days prior to Non-Alignment communication) oGFSI - Non-Alignment Communication	Couldn't reach consensus
CPO 6	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Suggest to include relevant stakeholders according to the specific case, selected from the whole ecosystem (Retailers, Accreditation Bodies, CPOs, etc.) not being involved in the decisions taken.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		Sanction process should be transparent including the escalation process. Additionally, what would initiate a sanction and what are the timelines involved? A definition is needed for non-alignment because it is not in currently in the glossary and shoudl be different than the non-confromance. Potential non-alignment esculation process for sanctioning should include the following steps: oCPO - Non conformance response oGFSI - CAP review oGFSI - CAP feedback or acceptance oCPO - Final CAP response on any feedback oGFSI - Assessment (communication to CPO at least 7 days prior to Non-Alignment communication) oGFSI - Non-Alignment Communication	Couldn't reach consensus
CPO 6	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time (aka 7 days) for stakeholder communication plan, prior to the suspension being published on the GFSI website	Couldn't reach consensus
CPO 6	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time (aka 7 days) for stakeholder communication plan, prior to the suspension being published on the GFSI website	Couldn't reach consensus
CPO 6	Part I	6	Sanctioning	This recommendation is passed to the GFSI Executive Director and the GFSI Board for final decision. The GFSI Technical Manager will inform the Certification Programme Owner of this final decision, including a full explanation for it.			Agree
CPO 6	Part I	6	Sanctioning	In the event that the GFSI Board considers that evidence of re-alignment is required but recognition may be maintained, the GFSI Technical Manager will follow up any required actions from the Certification Programme Owner; the GFSI Technical Manager may ask for the support of the Benchmark Leader.			Agree
CPO 6	Part I	6	Sanctioning	Once the realignment is confirmed, the GFSI Technical Manager will inform the GFSI Executive Director and the GFSI Board.			Agree
CPO 6	Part I	6	Sanctioning	In the event that the GFSI Board is not satisfied with the progress made, they may suspend the recognition of the Certification Programme.			Agree
CPO 6	Part I	6	Sanctioning	If the GFSI Board considers that a period of suspension of recognition shall be imposed, the GFSI website shall clearly specify the details and conditions of the suspension.			Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part I	6	Sanctioning	The Certification Programme Owner shall confirm to the GFSI Board that these remediation conditions can be achieved within the timescales set out by the GFSI Board, when evidence of the implementation of the corrective actions will be expected, and alignment to the GFSI Benchmarking Requirements can be reestablished.			Agree
CPO 6	Part I	6	Sanctioning	Once the re-alignment is confirmed, the GFSI Technical Manager will inform the GFSI Executive Director and the GFSI Board.			Agree
CPO 6	Part I	6	Sanctioning	In the event that the GFSI Board is not satisfied with the progress made by the Certification Programme Owner or their commitment to address any of their requirements, they may withdraw recognition of the Certification Programme.			Agree
CPO 6	Part I	6	Sanctioning	The GFSI Executive Director will inform the GFSI Board regarding the circumstances and convene a meeting to discuss the issue as soon as possible. The GFSI Board may grant voluntary withdrawal or initiate a suspension process. The GFSI Executive Director will inform the Certification Programme Owner of this decision.			Agree
CPO 6	Part I	6	Sanctioning	The Certification Programme Owner has the right to appeal against any decision made by the GFSI Board, the GFSI Executive Director or any person contracted to GFSI in relation to the Benchmarking Process.			Agree
CPO 6	Part I	6	Sanctioning	Any appeal shall be heard by an Appeals Committee, which is a body specifically assembled by the GFSI Board for the purposes of hearing an individual appeal. The GFSI Executive Director shall ensure that the investigation is conducted in an impartial and professional manner, and without any actual or perceived conflict of interest.			Agree
CPO 6	Part I	6	Sanctioning	The outcome of the investigation by the Appeals Committee shall be heard by the GFSI Board, and the decision made by the Appeals Committee shall be upheld by the GFSI Board.			Agree
CPO 6	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the GFSI Board decision.			Agree
CPO 6	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	This assessment process should be open to full Part II and Part III assessments for GFSI recognized organizations going through the recognition process to a new version of the GFSI benchmarking requirements.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.			Couldn't reach consensus
CPO 6	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.		Remove this last part of the element or require that accreditation bodies are signatories of the IAF MLA	Agree
CPO 6	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		There needs to be an implementation period of up to 18 months for the current version of the IAF MD4, IAF MD1, Codex, etc.	Couldn't reach consensus
CPO 6	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. 1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples. 2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.		Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.			Opportunity Identified
CPO 6	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages	This statement is not clear. Does this mean posting of the CPOs monitoring or CB monitoring. KPIs are intented to drive or reinforce good performance to CPO's programs and are intended to be used to optimized the program, drive collaboration and open communication with CBs. Since KPIs are very much driven by the CPO they are likely unique to each program with different criteria and will like drive confusion if published.	Couldn't reach consensus
CPO 6	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree. Remove the emphasis on the specific education requirement. Education can be included in the auditor qualifications however, the years of industry and auditing experience, in addition to continuing education courses should be granted more value.	Opportunity Identified
CPO 6	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	The WG member comment seems to deminish the requirement if the auditor needs to assess compliance to FSMS 4.1.	Agree
CPO 6	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available		Couldn't reach consensus
CPO 6	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Would recommend that you just make it audit reports so that confidentiality would cover all reports and there isn't a need to then come up with different defiintions for audit reports released at different stages of the audit process.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.	Any recognition may be suspended or withdrawn. Do not agree with WG comment - this would add further complexity to the system, and an e-solution is different to a certificate. CPO suspensions are published on the GFSI website already. Keep requirement unchanged. Adding another logo will cause confusion to the marketplace. If GFSI is moving forward with an e-solution, this is not needed. This adds complexity to the process since the certificate is issued by the certification body.	Couldn't reach consensus
CPO 6	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Revise to state - The Certification Programme Owner shall ensure that Certification Bodies make the following information available to the Certification Programme Owner:	Couldn't reach consensus
CPO 6	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		Isn't this covered by the AB assessment? This is duplicative of AB work.	Couldn't reach consensus
CPO 6	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		This is duplication of accreditation requirements and should be removed	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	It seems like there are significant overlaps between the existing behavoirs and those that are being recommended (e.g. Collaborative (not consulting) and Open minded; Morally courage and Ethical). Also it seems like Organized, Culturally sensitivie, Acting with fortitue, Open to improvement, and the existing behaviroial traits are all part of being Professional. Would suggest changing Culturally sensitive to Culturally aware.	Opportunity Identified
CPO 6	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Cannot include reference to GFSI auditor training and professional development framework as it has not been approved/completed. It is therefore not possible to determine whether this is suitable in this public consultation	Opportunity Identified
CPO 6	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Auditors that were qualified a long time ago, are being questioned and the level of competence of the auditors. Need to allow for grandfathering of existing auditors and have requirements linked to the benchmarking standard at the time. Make requirements to apply for new applicants. Remove the education requirement (to have a degree)- Table 1 as having a degree does not make a good auditor and is currently a restriction to onboard auditors should be an avenue for additional training/eduction vs only using higher education because CBs and CPOs could have an auditor training program to equip new auditors with techncal capabilities and audit skills.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Suggest adding the following sentence: If a food safety auditor is already approved for auditing GFSI-recognised Certification Programmes, only one witness audit against the specific Certification Programme is needed (there should be mutual recognition of auditors who have already completed initial qualification with a GFSI CPO).	Opportunity Identified
CPO 6	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	remove the requirement for supervised audits and training. CPO shall define procedure and requirements for scope extensions	Opportunity Identified
CPO 6	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Change to 3 against the relevant GFSI CPO; WG comment is contradictory to 4.15	Couldn't reach consensus
CPO 6	Part II	5.19	Audit Reporting	The Certification Programme Owner shall ensure that necessary agreements are in place with the audited organisations and the Certification Bodies so that the audit records are available on request to the Certification Programme Owner and to GFSI.		GFSI requests these reports and they are sent to an undisclosed email address. This should be addressed, also to manage GDPR requirements	Misunderstood
CPO 6	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	This should also be applied to the contract. 30 days to respond to NCs.	Couldn't reach consensus
CPO 6	Part II	5.27	Management of Certification	The Certification Programme Owner shall define minimum requirements for Certification Bodies considerations when organisations switch between GFSI-recognised Certification Programmes. This should include but not be limited to an evaluation of the organisation's audit history, last unannounced audit, etc.		GFSI recognized programmes do not all operate under the same accreditation norms, and therefore checking audit history and unannounced audits is not practical. Change last part of requirement as follows: This shall include a confirmation that the certification is still valid at the time of switching.	Couldn't reach consensus
CPO 6	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	It would be helpful if there was a report or report infromation that GFSI wants to receive from a CPOs on events.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	There shall be a period of time (18 months) to allow fo the implementaitno of a new version of a published standard that is referenced within the GFSI requirements.	Opportunity Identified
CPO 6	Part III FSMS	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.	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. *Suggest to update according to Codex: Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Do not agree with WG proposal as this gets too specific and creates challenges with regularotry requirements for specific categories. Please leave requirement as is.	Misunderstood
CPO 6	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	This seems to overlap with management review and HACCP requirements.	Couldn't reach consensus
CPO 6	Part III FSMS	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.			Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.		Opportunity Identified
CPO 6	Part III FSMS	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.	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 - add intended consumption as well?		Couldn't reach consensus
CPO 6	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.		Opportunity Identified
CPO 6	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.			Opportunity Identified
CPO 6	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*		Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 6	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.		Opportunity Identified
CPO 6	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	There shall be a period of time (18 months) to allow fo the implementaitno of a new version of a published standard that is referenced within the GFSI requirements.	Opportunity Identified
CPO 7	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	What type of investigations would apply in this instance? There are concerns that this implies that a CPO is guilty of an infraction when there may not be one. Are there safeguards around potenial reputational damage to a CPO in this instance where an investigation resulted in no findings?	Agree
CPO 7	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		A full application seems excessive in the case of a currently recognized CPO. Would suggest a potential gap/rebenchmarking process.	Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 7	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.	The fully benchmarked CPOs have established systems and proecsses to implement changes and undergo annual assessments from GFSI. When the new version of the GFSI benchmarking requirements get rolled out the facilities do not want to participate in those initial audits because they will not have the GFSI recognition. It would be a much more fluid process for the facilities if this assessment could be covered under the continued recognition classification.	Opportunity Identified
CPO 7	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	GFSI should give examples of special circumstances for extensions for clarity.	Couldn't reach consensus
CPO 7	Part I	5	Key procedural steps	A => Application		GFSI has the following rule in place *"in the year prior to publication of a new version of the GFSI benchmarking requirements, no new application will be accepted. A notice will be displayed on the GFSI website to indicate the starting date of this one-year period* ." GFSI should also alert recognzed CPO's in writing to their contact email(s) to facilitate stronger communication.	Opportunity Identified
CPO 7	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Would suggest adding a second contact in the case of the Executive Director being the subject of a complaint or appeal.	Misunderstood
CPO 7	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status. This communication shall be made prior to the suspension being published on the GFSI website.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 7	Part II	1.11	Certification Programme Development and Maintenance	The consultation period shall allow sufficient time for stakeholders to review the Certification Programme under development and send their comments to the Certification Programme Owner.		*"Sufficient Time,"* is fairly subjective and open to interpretation. GFSI might want to consider alignment with GSSI framework of 60 days for a public consultation period.	Opportunity Identified
CPO 7	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.		IAF MLA signatories demonstrate conformance with ISO / IEC 17011: It is not possible for a CPO to demonstrate this level of conformance. . The statement *"NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011,"* should be removed.	Agree
CPO 7	Part II	2.14	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies shall be publicly available and precisely defined in terms of the exact name of the Certification Programme in scope, its revision number and / or date and its sector of application reference (e.g. industry sector).		GFSI should clarify where this information should be posted to avoid confusion and different interpretations of the *"publicly available,"* requirement.	Opportunity Identified
CPO 7	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	GFSI should have to define what incidents are considered to bring GFSI into disrepute, and define the incident procedure, including timelines for communications. GFSI should define timelines for notification.	Opportunity Identified
CPO 7	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	The clause as currently written is adequete to drive performance and identify areas of improvement for the CB.	Couldn't reach consensus
CPO 7	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		AB's review CB personnel competence.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 7	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Remove the emphasis on the specific education requirement. Education can be included in the auditor qualifications however, the years of industry and auditing experience, in addition to continuing education courses should be granted more value.	Opportunity Identified
CPO 7	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Cannot include reference to GFSI auditor training and professional development framework as it has not been approved/completed. It is therefore not possible to determine whether this is suitable in this public consultation	Opportunity Identified
CPO 7	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Auditors that were qualified a long time ago, are being questioned and the level of competence of the auditors. Need to allow for grandfathering of existing auditors and have requirements linked to the benchmarking standard at the time. Make requirements to apply for new applicants. Remove the education requirement (to have a degree)- Table 1 as having a degree does not make a good auditor and is currently a restriction to onboard auditors should be an avenue for additional training/eduction vs only using higher education because CBs and CPOs could have an auditor training program to equip new auditors with techncal capabilities and audit skills.	Opportunity Identified
CPO 7	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Change to 3 against the relevant GFSI CPO; WG comment is contradictory to 4.15	Couldn't reach consensus
CPO 7	Part II	4.15	Maintenance of Auditor Skills and Competence	In specific situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.		If 4.14 is accepted. 4.15 is not needed.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 7	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Unclear what the WG means by *"type of non-conformity."*	Couldn't reach consensus
CPO 7	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	GFSI should add "Unannounced Audit," to the Glossary and define it for clarity.	Opportunity Identified
CPO 7	Part II	5.31	Use of ICT during the audit	With the exception of audits under the scope of recognition "FII - Broker", At least part of the annual full audit shall be carried out on site.		GFSI should include an allowance for full remote audits in the case of serious event, e.g. force majeure, war, pandemic, etc.	Couldn't reach consensus
CPO 7	Part II	5.34	Use of ICT during the audit	The CPO shall specify the maximum period of time between the beginning and the end of all audit activities included in the audit duration to maintain the audit efficiency and integrity. That period of time shall not exceed 30 days.		Clarify that the 30 day timeline refers to a single audit being carried out, and does not apply to the timeline between a Stage 1 and Stage 2 audit, or auditing the sites in a multi-site certification.	Couldn't reach consensus
CPO 7	Part II	2.18	Accreditation of Certification Bodies	In the event that accreditation is not granted within 12 months, the Certification Programme Owner shall ensure that the Certification Body contract shall be terminated, and potential actions reviewed. In situations where there is a delay, the Certification Body shall provide a plan to the Certification Programme Owner for approval to achieve accreditation.			Opportunity Identified
CPO 7	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).			Couldn't reach consensus
CPO 7	Part II	3.12	Desktop Assessment	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance on audit and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records.		Opportunity Identified
CPO 8	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Agree with WG member comments	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 8	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Agree with WG member comments	Couldn't reach consensus
CPO 8	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Agree with WG member comments	Misunderstood
CPO 8	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	Please remove "undergoing an investigation for longer than 1 month" as eligibility criteria of CPO because the investigation process is not a confirmed problem.	Agree
CPO 8	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Suggestion to 1. Cancel the requirement of the 10 latest issued certificate. 2.Modify the requirement to at least 1 certificate of the latest version of the Certification Programme for each Certification Body.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 8	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.		Misunderstood
CPO 8	Part I	4	Methodology	Benchmark Leader	GFSI Benchmark Leader	Suggest to publish the list of GFSI Benchmark Leaders on the website	Couldn't reach consensus
CPO 8	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	please extend the period from "within nine months of its date of publication" to "within twelves months of its date of publication" because nine months is too short duration to refect all the feedbacks from stakeholder consultations after developping the draft of new version.	Couldn't reach consensus
CPO 8	Part I	5	Key procedural steps		Consider allowing re-application within less than 12-month period, where the CPO implemented the required actions Question on the number 10 as the required number of certificates (need tangible criteria for defining a threshold) Use more concise descriptions of the steps (bullet points, flowcharts or diagrams to visually represent the procedural steps) This can help readers quickly understand the process flow and the relationships between different steps Maintain a uniform structure for each procedural step. Start each section with a brief overview, followed by detailed steps Provide more context or examples where necessary. Explain why certain steps are important or what the implications are if they are not followed correctly. Include real-world examples or case studies to illustrate the application of these steps Include a section on common issues or FAQs that might arise during the procedural steps, along with solutions or best practices Highlight any critical compliance or legal requirements associated with each procedural step. This can prevent potential oversights that may have legal implication	Agree with WG member comments	Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 8	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Please keep CAP (corrective action plan) in this requirement. Corrective actions which require Evidence of Completion and Preventive actions may require long-term actions even after executing the correction.	Agree
CPO 8	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Agree with WG member comments	Agree
CPO 8	Part I	6	Sanctioning		*Standalone escalation process to be described - flow diagram*	Agree with WG member comments	Couldn't reach consensus
CPO 8	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Agree with WG member comments	Agree
CPO 8	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	Please add a definition of "significant change" in this requirement.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 8	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Agree with WG member comments	Opportunity Identified
CPO 8	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	As for WG comment, we have a strong concern over confidential information to publish the performance monitoring of CPOs. Please ensure the confidentiality to be dislosed by GFSI and CPO. Consequently CPO may update the contract with CBs and/or FBOs.	Couldn't reach consensus
CPO 8	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	In case this requirement would include a minimum frequency of witness assessment and compitency of witness assesor, it is recommended that CPO is responsible for defining its frequency and competency.	Opportunity Identified
CPO 8	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree with WG member comments	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 8	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Please keep 'quality assurance' in this requirement because quality assurance department often involves food safety function.	Opportunity Identified
CPO 8	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Please remove "respective of a given certification programme" from WG proposal. This will be a auditor registration problem for small/new CPO and CB.	Opportunity Identified
CPO 8	Part II	4.10.2	Initial Auditor Qualification	The Certification Programme Owner shall ensure that the witness audit(s) carried out as part of the certification body's initial auditor qualification follows the standard audit plan agreed with the certified organisation, including the use of ICT if applicable, as long as this does not compromise the effectiveness of the assessment. The Certification Programme Owner shall ensure that the witness assessor is present on site for parts of the audit carried out on site.	Suggest to introduce a distinction for 1st approval where the entire witness audit should be conducted on site (no permitted use of ICT).	Please allow us to maintain a system that can also operate by ICT. It is necessary that Interviews or hearings or other desktop audit should be executed by ICT, taking into account the response to emergency situations	Opportunity Identified
CPO 8	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	Agree with WG member comments	Opportunity Identified
CPO 8	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	For a CB, "access" is possible, but "are able to apply" is that it may require legal qualifications and expertise, which runs the risk of exceeding the CB's capabilities. "Are able to apply" is not necessary for feasible operation.	Couldn't reach consensus
CPO 8	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Agree with WG member comments	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 8	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Agree with WG member comments	Couldn't reach consensus
CPO 8	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Even during a "state of emergency," there may be cases where an exemption from unannounced audits is necessary. Please add cases where unannounced audits are exempted, taking into account the social situation.	Opportunity Identified
CPO 8	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	Please add "e-systems" to the Glossary. It is difficult to indicate the announced or nonannounced on certificates	Couldn't reach consensus
CPO 8	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Agree with WG member comments	Opportunity Identified
CPO 8	Part II	2.15	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies undertaking audits against a GFSI-recognised Certification Programme have the named Certification Programme and its revision number included in their scope of accreditation.			Misunderstood
CPO 8	Part III FSMS	9.2.1	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the food if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.		If the shelf-life of the food is longer than legal requirements, the length of the storing period should be the shelf-life of the food.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 8	Part III FSMS	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.	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. *Suggest to update according to Codex: Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Agree with WG member comments	Agree
CPO 8	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	Agree with WG member comments	Couldn't reach consensus
CPO 8	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	Agree with WG member comments	Couldn't reach consensus
CPO 8	Part III FSMS	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.	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 - add intended consumption as well?		Couldn't reach consensus
CPO 8	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.		Opportunity Identified
CPO 8	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*		Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 8	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	Agree with WG member comments	Opportunity Identified
CPO 9	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Two Certification Bodies (CBs) is acceptable. We do not support the option of using only one CB, as involving multiple CBs in a program demonstrates the CPO's capacity to effectively govern their scheme. Relying on a single CB may also shift the relationship dynamic, potentially blurring financial and compliance boundaries between the CPO and the CB.	Agree
CPO 9	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Management changes should not impede the rebenchmarking process. We suggest removing this requirement entirely. Additionally, examples listed in the requirements are often perceived as mandatory. We recommend reviewing these across other requirements to ensure clarity. It's advisable to delete examples altogether, as they may not directly affect the quality of the GFSI-recognised certification program and could be misinterpreted as absolute criteria.	Opportunity Identified
CPO 9	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	We agree with the working group that the process for new and existing CPOs should differ. The 12-month operation requirement for existing benchmarked CPOs should be removed. For new versions of recognised programs, it should only be necessary to demonstrate that the updated version complies with current benchmarking requirements through document assessment. Verification of implementation can be done during routine assessments, ensuring continuous benchmarking without unnecessary duplication.	Opportunity Identified
CPO 9	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	Disagree with the wrking group comment. An ongoing investigation should not automatically result in the benchmarking process being placed on hold. Further clarification or justification for such a stance is required. Examples for types of investigations and timeframe of when the CPO could re-apply is needed.	Agree

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	We agree with the working group's comments that the process for new and existing CPOs should not be the same. Specifically, we suggest removing the requirement for 12 months of operation for existing benchmarked CPOs. For new versions of currently recognised programs, it should only be necessary to demonstrate compliance with current benchmarking requirements through a document assessment. Verification of implementation can be conducted during routine maintenance of certification assessments, with a work plan in place to ensure continuous benchmarking. The 12-month operational requirement seems duplicative when compared to the criteria in row 11, which already states: "The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations." We suggest revising the eligibility criteria for recognised programs to allow GFSI to conduct continued recognition assessments of existing, recognised programs (in good standing) against new	Opportunity Identified
CPO 9	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	We agree with the working group's comments; current scopes align with ISO 22003. The full application process should not apply to existing recognised CPOs. Instead, a rebenchmarking process should be implemented based on a GAP assessment and defined under continued recognition. This approach would streamline the process for existing CPOs while ensuring alignment with updated requirements.	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.	The full application process should not apply to existing recognised CPOs -a rebenchmarking process should be in place, based on a GAP assessment and be defined under continued recognition; and no need to demonstrate market demand by submitting 10 certificates per category. The fully benchmarked CPOs have established systems and proecsses to implement changes and undergo annual assessments from GFSI. When the new version of the GFSI benchmarking requirements get rolled out the participating businesses do not want to be part of the initial audits because they will not have the GFSI recognition. It would be a much more streamlined process for the participating businesses if this assessment could be covered under the continued recognition classification.	Opportunity Identified
CPO 9	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Recommend that a change from 9 months to 12 months be applied to this caluse. 12 months will to allow for effective change management and implementation. Examples of special circumstances for extensions should be provided for clarity.	Couldn't reach consensus
CPO 9	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Preventative actions is not appropriate at CPO level; keep current wording as is: Corrective action planning	Agree
CPO 9	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Board decision and communicating to the CPO, e.g. 2 weeks.	Couldn't reach consensus
CPO 9	Part I	5	Key procedural steps	A => Application			Opportunity Identified
CPO 9	Part I	5	Key procedural steps	E => Stakeholder consultation			Misunderstood

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Agree with the independent appointment. Need to have an independent appeals committee that has good understanding of the benchmarking requirements and representative of the scope of the appeal. The persons on the committee should understand what the process is about. Relevant industry representatives to include: AB, CB, CPO, site(relevant to the appeal), auditor, academic, retailer, Have a list and then pick from the list on the appeal.	Agree
CPO 9	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		Sanction process should be transparent including the escalation process including what would initiate a sanction and the timelines involved. A definition is needed for non-alignment as its not in current glossary; CPO - Non conformance response GFSI - CAP review GFSI - CAP feedback or acceptance CPO - Final CAP response GFSI - Assessment (communication to CPO at least 7 days prior to Non-Alignment communication) GFSI - Non-Alignment Communication	Couldn't reach consensus
CPO 9	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time for stakeholder communication plan, prior to the suspension being published on the GFSI website	Agree
CPO 9	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		The CPO shall be informed in writing in the case of withdrawal, prior to the withdrawal being published on the GFSI website	Agree
CPO 9	Part I	6	Sanctioning	The Certification Programme Owner has the right to appeal against any decision made by the GFSI Board, the GFSI Executive Director or any person contracted to GFSI in relation to the Benchmarking Process.		Change board to Steering Committee.	Agree
CPO 9	Part I	6	Sanctioning	This recommendation is passed to the GFSI Executive Director and the GFSI Board for final decision. The GFSI Technical Manager will inform the Certification Programme Owner of this final decision, including a full explanation for it.			Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	This assessment process should be open to full Part II and Part III assessments for GFSI recognised organisations going through the recognition process to a new version of the GFSI benchmarking requirements.	Opportunity Identified
CPO 9	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.		It is not possible to comment on WG Member comments and proposals, so a second public consultation would be required once the final document is available to ensure a transparent process; Ownership definition needs to be aligned with Part 1	Couldn't reach consensus
CPO 9	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.		All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011. It is not possible for a CPO to demonstrate this level of conformance. Remove this last part of this element	Agree
CPO 9	Part II	2.14	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies shall be publicly available and precisely defined in terms of the exact name of the Certification Programme in scope, its revision number and / or date and its sector of application reference (e.g. industry sector).		Clarify where this needs to be posted.	Opportunity Identified
CPO 9	Part II	3.1	Relationship with Certification Bodies	The Certification Programme Owner shall have contractual and enforceable arrangements with all Certification Bodies accredited to ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003 to operate their Certification Programme.		As it is a requirement for CBs to be accredited, then the accreditation requirements should not be duplicated in the benchmarking requirements.	Couldn't reach consensus
CPO 9	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		GFSI should add clarity around this requirement. Is it being available to CB personnel and auditors enough to satisfy the clause? There needs to be an implementation period of up to 18 months for the current version of the IAF MD4, IAF MD1, Codex, etc.	Couldn't reach consensus
CPO 9	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		Inefficient. Isn't this covered by the AB assessment? Duplication of work by the CPOs.	Couldn't reach consensus
CPO 9	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Remove: "at all times" or reword	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Do not agree with working group examples added, GFSI have to define what incidents are considered to bring GFSI into disrepute, and define the incident procedure, including timelines for communications. A serious food safety situation is an outbreak. Reporting of recalls should be removed, as not all recalls can be reported to GFSI. If reporting back to GFSI is required, then additional requirements outlining the minimum information should be included. Clarification on expectations should be identified. Also need agreed timeframes for reporting and for GFSI to respond back to the CPO.	Opportunity Identified
CPO 9	Part II	3.12	Desktop Assessment	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance on audit and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records.	No change necessary.	Agree
CPO 9	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		Remove product recalls from the list of risk factors as product recalls is not a metric linked to the performance of a CB.	Opportunity Identified
CPO 9	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	Do not agree with the working group comment of publishing this information on the GFSI website or CPO public pages. Keep current criteria. As KPIs are intented to drive or reinforce good performance to CPO's programs and are intended to be used to optimise the program, drive collaboration and open communication with CBs. Since KPIs are very much driven by the CPO they are likely unique to each program with different criteria and will like drive confusion if published.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		This is duplicative of AB process.	Couldn't reach consensus
CPO 9	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		This is duplicative of AB process.	Couldn't reach consensus
CPO 9	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	Remove examples and leave only the first part of the element content up to: as specified by the CPO, and include that auditor performance includes the evaluation of soft skills.	Opportunity Identified
CPO 9	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	Do not agree with with working group comments - CPOs to define the requirements for witness assessments	Opportunity Identified
CPO 9	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree. Remove the emphasis on the specific education requirement. Education can be included in the auditor qualifications however, the years of industry and auditing experience, in addition to continuing education courses should be granted more value and considered as an equivalence option.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Cannot include reference to GFSI auditor training and professional development framework as it has not been approved/completed. It is therefore not possible to determine whether this is suitable in this public consultation.	Opportunity Identified
CPO 9	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Auditors that were qualified a long time ago, are being questioned and the level of competence of the auditors. Need to allow for grandfathering of existing auditors and have requirements linked to the benchmarking standard at the time. Make requirements to apply for new applicants. An avenue for additional training/eduction vs only using higher education should be considered, as CBs and CPOs could have an auditor training program to equip new auditors with technical capabilities and audit skills.	Opportunity Identified
CPO 9	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Allow to recognise other GFSI recognised CPO witness audits. Allow for a risk-based assessment dependent on the auditor	Opportunity Identified
CPO 9	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	Remove the requirement for supervised audits and training. CPO shall define procedure and requirements for scope extensions.	Opportunity Identified
CPO 9	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Leave requirement as is - relevant laws is sufficient	Agree

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Change to 3 against the relevant GFSI CPO; WG comment is contradictory to 4.15	Couldn't reach consensus
CPO 9	Part II	4.15	Maintenance of Auditor Skills and Competence	In specific situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.		If 4.14 is accepted. 4.15 is not needed.	Opportunity Identified
CPO 9	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Having a "type" of non-conformity is not a requirement. Change to where the integrity of the certification could be at risk	Couldn't reach consensus
CPO 9	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree with the working group and technical subcommittee for the removal of unannounced audits for primary production scopes. Unannounced audit also needs be defined in the glossary.	Opportunity Identified
CPO 9	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Would recommend that you just make it audit reports so that confidentiality would cover all reports and there isn't a need to then come up with different defiintions for audit reports released at different stages of the audit process.	Couldn't reach consensus
CPO 9	Part II	5.19	Audit Reporting	The Certification Programme Owner shall ensure that necessary agreements are in place with the audited organisations and the Certification Bodies so that the audit records are available on request to the Certification Programme Owner and to GFSI.		GFSI requests these reports and they are sent to an undisclosed email address. Information should be sent to known recepients.	Misunderstood

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Any recognition may be suspended. Do not agree withworking group comment - this would add further complexity to the system, and an e-solution is different to a certificate. CPO suspensions are published on the GFSI website already. Keep requirement unchanged. Adding another logo will cause confusion to the marketplace. If GFSI is moving forward with an e-solution, this is not needed. This adds complexity to the process since the certificate is issued by the certification body.	Couldn't reach consensus
CPO 9	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	This should also be applied to the contract. 30 days to respond to NCs.	Couldn't reach consensus
CPO 9	Part II	5.27	Management of Certification	The Certification Programme Owner shall define minimum requirements for Certification Bodies considerations when organisations switch between GFSI-recognised Certification Programmes. This should include but not be limited to an evaluation of the organisation's audit history, last unannounced audit, etc.		GFSI recognised programmes do not all operate under the same accreditation norms, and therefore checking audit history and unannounced audits is not practical. Change last part of requirement as follows: This shall include a confirmation that the certification is still valid at the time of switching.	Couldn't reach consensus
CPO 9	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Everything is public information.	Opportunity Identified
CPO 9	Part II	5.31	Use of ICT during the audit	With the exception of audits under the scope of recognition "FII - Broker", At least part of the annual full audit shall be carried out on site.		Include an allowance for full remote audits in the case of serious event, e.g. force majeure, war, pandemic, etc.	Couldn't reach consensus
CPO 9	Part II	5.34	Use of ICT during the audit	The CPO shall specify the maximum period of time between the beginning and the end of all audit activities included in the audit duration to maintain the audit efficiency and integrity. That period of time shall not exceed 30 days.		Clarify that the 30 day timeline refers to a single audit being carried out, and does not apply to the timeline between a Stage 1 and Stage 2 audit, or auditing the sites in a multi-site certification.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Agree in principle, as a clear distinction is needed and doesn't exist at the moment. However, we cannot really comment until the draft text is made available for comment.	Opportunity Identified
CPO 9	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	Do not agree with WG comment as % sites of large multi-site organizations would not be a small number. Propose to add as follows: If necessary, a small number of the sample sites may be audited prior to the audit of the central function with proper justification	Couldn't reach consensus
CPO 9	Part II	6.16	Internal audit	Clear requirements for internal auditors and technical reviewers shall be defined, documented and reviewed by the Certification Body.	Clear requirements for internal auditors and ~~technical~~ reviewers shall be defined, documented and reviewed by the Certification Body.	Keep requirement unchanged.	Agree
CPO 9	Part II	6.21	Site audit sampling	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. 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.	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. 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	Add ISO 22003-1 or ISO 22003-2 as applicable, as sampling requirements are set out in these normative accreditation documents, that are different to IAF MD1. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
CPO 9	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable	Opportunity Identified
CPO 9	Part II	6.24	Site audit sampling	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.	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 MD1	Changes to an external reference cannot be instantly incorporated into a standard. There needs to be allowed a transition time (in alignment with the CPO's current version update cycle) from when the update is made to when it is incorproated into the standard. This comment would render all the CPO's standards out of compliance. This allows for public consultation and other requirements in support of the GFSI requirements.	Opportunity Identified
CPO 9	Part II	6.27	Management of non-conformities	If the central function, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including the central function and all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.	Define "critical Certification Programme requirements" or suggest to replace by "leading to major non conformities". Some members suggested " fundamental certification programme requirements".	Change to: fails to meet the certification programme requirements (including not addressing any NCs raised within the defined timelines)	Couldn't reach consensus
CPO 9	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	20 is aligned with ISO 22003, so do not change as it will lead to inconsistency with an international approach	Opportunity Identified
CPO 9	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.		Couldn't reach consensus
CPO 9	Part III FSMS	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.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements and resubmitted for commenting	Couldn't reach consensus
CPO 9	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	As with Part III HACCP comments - the term 'latest version' needs a system of change management as a change to a Codex document cannot immediately be incorporated into the Standards.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part III FSMS	3	Management review	The senior management shall review all elements of the Food Safety Management System, including 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.		We suggest to refrase the element: The senior management shall review all elements of the Food Safety Management System, including the Food Safety Culture, the Hazard and Risk Management System, HACCP plan or HACCP plans regularly, and in case of any change that impacts food safety, to ensure their continuing suitability and effectiveness.	Opportunity Identified
CPO 9	Part III FSMS	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.		We suggest to make it clear that growing a strong Food Safety Culture should be part of the food safety policy.	Couldn't reach consensus
CPO 9	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Do not agree with working group proposed changes, leave requirement as is. If the WG are to update the requirement to meet the revised Codex document then we agree with that principle but recommend alternative, clearer wording.	Agree
CPO 9	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	The intension of the working group amendment isnt clear and is therefore unlikely to be effective.	Agree
CPO 9	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	The elements title for 16.1 appears to be incorrect	Opportunity Identified
CPO 9	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Applicable scopes are not identified.	Opportunity Identified
CPO 9	Part III FSMS	18	Printed material control	Procedures shall be established, implemented and maintained to manage packaging materials printed with product ingredient list(s), allergens, identification code and other critical information and prevent mis-printing.		Element number is missing the last digit	Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part III FSMS	19.1	Testing	A procedure shall be established, implemented and maintained to ensure that analyses of food parameters critical to food safety are undertaken by competent laboratories and using appropriate sampling and testing methods and that such analyses are performed in accordance with the applicable requirements of ISO/IEC 17025.		Suggest to remove 17025 and apply the GFSI definition of competent laboratory. Challenge is that for some laboratories, such as government laboratories, 17025 is not able to be verfied.	Couldn't reach consensus
CPO 9	Part III FSMS	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.		Requirement seems to be split - row 79 on product recall - then remove reference to withdrawal in this line, as it is included in row 80	Misunderstood
CPO 9	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	Do not agree with this inclusion. This should be covered in the management review process.	Couldn't reach consensus
CPO 9	Part III GAP	1	Land used for production	Land used for production shall be evaluated for hazards and contamination. Control measures shall be implemented to reduce hazards to acceptable levels.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements Production environment shall be evaluated for hazards and contamination. Control measures shall be implemented to reduce hazards to acceptable levels.	Opportunity Identified
CPO 9	Part III GAP	5	Employee facilities	Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.		Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed, operated, maintained and cleaned to minimise food safety risks.	Agree
CPO 9	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.	Agree with change.	Couldn't reach consensus
CPO 9	Part III 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, equipment and post-harvest washing, with appropriate facilities for its storage and distribution.	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.	Indoor primary production facilities shall maintain ~~a supply of a~~ water sources, storage and distribution systems ~~fit for its purpose and~~ that do not compromise food safety, for handwashing, equipment and post-harvest washing, with appropriate facilities for its storage and distribution.	Couldn't reach consensus
CPO 9	Part III GAP	13.2	Pest control	Based on risk assessment, operations shall assess potential contamination associated with wild and domestic animals.		Based on a risk assessment, and updated whenever there is a change affecting food safety, operations shall assess potential contamination associated with wild and domestic animals	Couldn't reach consensus

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
CPO 9	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Recommend to delete the additional language. The selection and application of chemicals is addressed in 14.3 and 14.4. The type and use of all agricultural chemicals are to follow manufacturer, regulatory and intended purpose.	Agree
CPO 9	Part III GAP	14.6	Input - Agricultural chemicals	Agricultural chemicals shall comply with applicable legislation (both country of production and intended sale), be correctly labelled, stored in a safe, well-ventilated place away from production areas, living areas and harvested crops and disposed of in a manner that does not pose a risk of contaminating crops.		Agricultural chemicals shall comply with applicable legislation (both country of production and intended sale), be correctly labelled, stored in a safe, well-ventilated place away from production areas, living areas and harvested crops and disposed of in a manner that does not pose a risk of contaminating crops. Water used for chemical applications shall be microbiologically equivalent to irrigation water.	Couldn't reach consensus
CPO 9	Part III GAP	18.2	Equipment	Equipment shall be used and stored to minimise food safety risk.		Equipment shall be maintained, used, transported and stored to minimise food safety risk.	Agree
CPO 9	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.		It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements	Opportunity Identified
CPO 9	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	clarify	Couldn't reach consensus
CPO 9	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	Need to understand what scopes this would apply.	Opportunity Identified
CPO 9	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Recommend to eliminate the additional language. The added wording is too prescriptive and doesn't allow for regional differences in terminology and risk.	Agree
CPO 9	Part III GMP	18	Equipment	Equipment shall be suitable for the intended purpose. Equipment shall be designed, constructed, maintained, used and stored to minimise food safety risks.		Equipment shall be suitable for the intended purpose. Equipment shall be designed, constructed, maintained, cleaned, sanitised, used, transported and stored to minimise food safety risks. Sanitising of equipment is subject to risk assessment.	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	It is not clear in this section which scopes (food chain categories) the element applies to - this needs to be clarified and clear for each element in Part III of the benchmarking requirements and resubmitted for commenting once clarified	Opportunity Identified
CPO 9	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	There must be a system of change management for external references. Changes to an external reference document including Codex, cannot instantly be incorporated into a Standard.	Opportunity Identified
CPO 9	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	1.1.1, 1.1.2 and 1.1.3 are obviously designed for different GFSI scopes. However, GFSI have not listed which will be applied to which scope. It is therefore not possible to comment on the acceptability or otherwise of the wording to the specific scope.	Opportunity Identified
CPO 9	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	HACCP requirements should be more uniform in language accross the scopes.	Opportunity Identified
CPO 9	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Suggest to include the term **"Significant food safety hazards**" are those that requires control measures (CCP's - CP's/OPPR's). As definition: significant food safety hazard identified through the hazard assessment, which needs to be controlled by control measures. Also recommended to include the following definitions under **PART IV Glossary:** Food Safety Hazard and Significant Food Safety Hazard in order to provide clarification.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
CPO 9	Part IV Glossary	Glossary	Site	Location where an organisation performs work or from which a service is provided. Facility subject to the audit scope.		Agree with WG comments	Misunderstood
EI 1	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.		Agree
EI 1	Part III FSMS	4.3	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation.		repetitive = 4.1	Misunderstood
EI 1	Part III FSMS	9.2.2	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the feed if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.		consider technology developments , data intergity , storage etc.	Couldn't reach consensus
EI 1	Part III FSMS	9.2.3	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the packaging if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.		consider technology developments , data intergity , storage etc.	Couldn't reach consensus
EI 1	Part III FSMS	10.2	Specified requirements / Specifications	A review process of the specified requirements or specifications shall be in place.		include recognised methods of testing and analysis	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 1	Part III FSMS	10.3	Specified requirements / Specifications	The Food Safety Management System shall ensure that packaging used to impart or provide a functional effect on the safety of the food to be packed in this packaging, such as shelf life extension shall, where known, be effective within its own specified criteria.		include recognised methods of testing and analysis	Couldn't reach consensus
EI 1	Part III FSMS	10.4	Specified requirements / Specifications	There shall be sufficient data to ensure food contact with the packaging is safe, and sufficient documentation of claims, according to the intended use, where recycled material, plant based material or functional additives are used.		include recognised methods of testing and analysis	Couldn't reach consensus
EI 1	Part III FSMS	13.1.3	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 regulatory requirements.		regulatory requirements and recognised scientific standards	Couldn't reach consensus
EI 1	Part III FSMS	14.4	Traceability	Livestock and the records associated with that livestock that has been treated with veterinary medicines and are within the manufacturer's recommended waiting period for that course of treatment shall be clearly identified.		comply with the legal requirements of geographical region being reared and in country of intended sale	Misunderstood
EI 1	Part III FSMS	14.5	Traceability	Specific policies shall be in place for the procurement of approved veterinary medicines.		legally compliant by region and in country of intended sale	Misunderstood
EI 1	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	lack of consistency in allergen testing , methodolgies - globally	Opportunity Identified
EI 1	Part III FSMS	18	Printed material control	Procedures shall be established, implemented and maintained to manage packaging materials printed with product ingredient list(s), allergens, identification code and other critical information and prevent mis-printing.		Suggets adding - in compliance with legal requirements of country of manufacture / sale and consumption	Couldn't reach consensus
EI 1	Part III FSMS	19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		suggest - EMP to be reviewed at a regular frequency	Couldn't reach consensus
EI 1	Part III FSMS	19.3	Environmental monitoring	A risk-based approach shall be in place to define the environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		suggest - EMP to be reviewed at a regular frequency	Misunderstood
EI 1	Part III FSMS	22.2	Serious incident management	In case of any livestock found to be infected with a notifiable disease, parasite or condition that would compromise food safety, measures for the containment and quarantine shall be established and implemented.		suggest in line with approriate legislation	Couldn't reach consensus
EI 1	Part III FSMS	23.3	Product release	Hygienic design construction specifications shall be verified for buildings and equipment prior to dispatch or hand-over to the customer.		suggest - include buildings ,services, utilities as appropriate	Couldn't reach consensus
EI 1	Part III FSMS	8.3	Food fraud	This food fraud mitigation plan shall be supported by the organisation's Food Safety Management System.	agreed		Couldn't reach consensus
EI 1	Part III FSMS	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.	agreed		Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 1	Part III FSMS	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.	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. *Suggest to update according to Codex: Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*		Misunderstood
EI 1	Part III FSMS	11	Procedures	Procedures and instructions shall be established, implemented and maintained for all processes and operations having an effect on food safety.			Misunderstood
EI 1	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.		Agree
EI 1	Part III FSMS	19.1	Testing	A procedure shall be established, implemented and maintained to ensure that analyses of food parameters critical to food safety are undertaken by competent laboratories and using appropriate sampling and testing methods and that such analyses are performed in accordance with the applicable requirements of ISO/IEC 17025.	agreed - including allergen testing		Misunderstood
EI 1	Part III GMP	4.2	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to maintain product integrity and regulatory compliance regarding the disposal, resale, donation, restocking or reuse of product being salvaged or reclaimed.			Couldn't reach consensus
EI 1	Part III GMP	4.10	Product contamination risk and segregation	Prior to building commissioning or equipment dispatch, buildings / equipment shall be cleaned by the manufacturer / constructor using appropriate methods that will remove all food safety hazards associated with the construction process. Cleaning should be recorded and verified.			Couldn't reach consensus
EI 1	Part III GMP	7.3	Training	Procedure shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	Procedures shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.		Agree
EI 1	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*		Opportunity Identified
EI 1	Part III GMP	15	Transport	All containers and vehicles used for transportation in a way that could impact food safety shall be designed, constructed and maintained to minimise food safety risks. They shall be suitable for the intended purpose			Agree
EI 1	Part III GMP	3	Site design, construction, layout and flow of operations	The site, both the exterior and the interior, shall be designed, constructed and maintained to minimise food safety risks. The layout and flow of operations shall be suitable for the intended purpose and designed to minimise food safety risks.		in line with hygienic design principles	Agree
EI 1	Part III GMP	3.2	Site design, construction, layout and flow of operations	The building in which equipment is manufactured shall be designed, constructed and maintained to minimise any contamination of the manufactured equipment which may affect food safety.		in line with hygienic design principles	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 1	Part III GMP	4.3	Product contamination risk and segregation	Procedures and control measures shall be in place to manage the use of feed medication where applicable.		in line with legislation in the country of origin, sale and consumption ?	Couldn't reach consensus
EI 1	Part III GMP	4.4	Product contamination risk and segregation	The use of ingredients that contain substances that can be deleterious to certain classes of animals shall be appropriately managed.		in line with legislation in the country of origin, sale and consumption ?	Couldn't reach consensus
EI 1	Part III GMP	4.5	Product contamination risk and segregation	An inspection process shall be in place at lairage and / or at evisceration to ensure animals are fit for human consumption.		in line with legislation in the country of origin, sale and consumption ?	Couldn't reach consensus
EI 1	Part III GMP	4.6	Product contamination risk and segregation	Defined post-slaughter time and temperature requirements shall be in place in relation to the chilling or freezing of product.		in line with legislation in the country of origin, sale and consumption ?	Couldn't reach consensus
EI 1	Part III GMP	4.7	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to ensure printed materials are not mixed or intermingled with other materials including in-process and reworked materials.		in line with legislation in the country of origin, sale and consumption ?	Couldn't reach consensus
EI 1	Part III GMP	4.9	Product contamination risk and segregation	Procedures shall be in place to prevent the cross-contamination of food from hazards created by construction activities if construction is undertaken at a site in which food is being handled.		in line with Hygienic design principles	Couldn't reach consensus
EI 1	Part III GMP	5	Employee facilities	Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.		in line with hygienic design principles	Couldn't reach consensus
EI 1	Part III GMP	6.2	Personal hygiene, protective clothing and medical screening	Suitable protective clothing shall be provided to minimise food safety risks.		risk based	Couldn't reach consensus
EI 1	Part III GMP	6.4	Personal hygiene, protective clothing and medical screening	The requirements 6.1, 6.2, and 6.3 shall apply to employees, contractors and visitors commensurate to their impact on food safety.		risk based	Couldn't reach consensus
EI 1	Part III GMP	8.1.1	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.	Procedures for housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, VALIDATED ? based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.	validated ?	Couldn't reach consensus
EI 1	Part III GMP	8.1.2	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a feed safety risk.	Procedures for housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness shall be verified, Validated based on the risks associated with the product or activity. Cleaning activities shall not represent a feed safety risk.	validated ?	Couldn't reach consensus
EI 1	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.		Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 2	Part II	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Senior management commitment is cited in Preliminary Steps (Chapter 5) and Food Safety Plan Implementation and Management (Chapter 14) in the (ORGANISATION) curriculum.(ORGANISATION) states that Management must demonstrate commitment to producing safe food and ensure that appropriate resources a made available to enable that to occur.	Misunderstood
EI 2	Part II	3	Management review	The senior management shall review all elements of the Food Safety Management System, including 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.		Senior management commitment and review of Food Safety Management System are included in Preliminary Steps (Chapter 5) and Food Safety Plan Implementation and Management (Chapter 14) in the (ORGANISATION) curriculum.In Chapter 14, it is further stated that the food safety plan must be reviewed and signed by owner, operator, or agent-in-charge per FDA's regulation 21 CFR 117.310.	Misunderstood
EI 2	Part II	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.		An entire chapter on Supply-Chain Preventive Controls (Chapter 13) discusses food safety hazards in ingredients and other raw materials that may require the supplier to control those hazards. Specifications are also addressed in this chapter as well as supplier verification requirements to be conducted at the supplier level, e.g., audits to assure supplier's control of food safety hazards.	Misunderstood
EI 2	Part II	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	Chapters 4 and 11 in the (ORGANISATION) curriculum address food allergen controls (allergen management plan) that must be established to control both undeclared allergens and allergen cross-contact.	Misunderstood
EI 2	Part II	16.2	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.	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.	Chapters 4 and 11 in the (ORGANISATION) curriculum address food allergen controls (allergen management plan) that must be established to control both undeclared allergens and allergen cross-contact.	Misunderstood
EI 2	Part II	17.1	Control of measuring and monitoring equipment / devices	The equipment / devices used to measure parameters critical to ensure food safety shall be identified.		Chapter 8, 9, 10 in the (ORGANISATION) curriculum discuss process preventive controls (CCPs), critical limits, monitoring, and verification (calibration of CCP monitoring devices). Examples are provided of equipment and devices used to measure parameters critical to ensure food safety.	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 2	Part II	17.2	Control of measuring and monitoring equipment / devices	The identified equipment / devices shall be regularly calibrated; calibration shall be traceable to a national or international standard or method.		Chapter 8, 9, 10 in the (ORGANISATION) curriculum discuss process preventive controls (CCPs), critical limits, monitoring, and verification (calibration of CCP monitoring devices). Examples are provided of equipment and devices used to measure parameters critical to ensure food safety. The curriculum cites calibration shall be traceable to a national or international standard.	Misunderstood
EI 2	Part II	19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		(ORGANISATION) curriculum's Chapter 12 and Appendices 5 and 6 address environmental monitoring programs as a means of verification of effective equipment / facility sanitation.	Misunderstood
EI 2	Part II	19.3	Environmental monitoring	A risk-based approach shall be in place to define the environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		(ORGANISATION) curriculum's Chapter 12 and Appendices 5 and 6 address environmental monitoring programs as a means of verification of effective equipment / facility sanitation.	Misunderstood
EI 2	Part II	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.		(ORGANISATION) curriculum's as a chapter dedicated to Recall Management (Chapter 15).	Misunderstood
EI 2	Part II	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.		The (ORGANISATION) curriculum discussed required corrective actions for all preventive control deviations (process preventive controls- CCPs, allergen preventive controls, sanitation preventive controls, supply-chain preventive controls.	Misunderstood
EI 2	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Senior management commitment is cited in Preliminary Steps (Chapter 5) and Food Safety Plan Implementation and Management (Chapter 14) in the (ORGANISATION)curriculum. (ORGANISATION) states that Management must demonstrate commitment to producing safe food and ensure that appropriate resources a made available to enable that to occur.	Misunderstood
EI 2	Part III FSMS	3	Management review	The senior management shall review all elements of the Food Safety Management System, including 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.		Senior management commitment and review of Food Safety Management System are included in Preliminary Steps (Chapter 5) and Food Safety Plan Implementation and Management (Chapter 14) in the FSPCA PCHF curriculum.In Chapter 14, it is further stated that the food safety plan must be reviewed and signed by owner, operator, or agent-in-charge per FDA's regulation 21 CFR 117.310.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
EI 2	Part III FSMS	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.		An entire chapter on Supply-Chain Preventive Controls (Chapter 13) discusses food safety hazards in ingredients and other raw materials that may require the supplier to control those hazards. Specifications are also addressed in this chapter as well as supplier verification requirements to be conducted at the supplier level, e.g., audits to assure supplier's control of food safety hazards.	Misunderstood
EI 2	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	Chapters 4 and 11 in the (ORGANSATION) curriculum address food allergen controls (allergen management plan) that must be established to control both undeclared allergens and allergen cross-contact.	Misunderstood
EI 2	Part III FSMS	16.2	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.	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.	Chapters 4 and 11 in the (ORGANSATION) curriculum address food allergen controls (allergen management plan) that must be established to control both undeclared allergens and allergen cross-contact.	Misunderstood
EI 2	Part III FSMS	17.1	Control of measuring and monitoring equipment / devices	The equipment / devices used to measure parameters critical to ensure food safety shall be identified.		Chapter 8, 9, 10 in the (ORGANISATION) curriculum discuss process preventive controls (CCPs), critical limits, monitoring, and verification (calibration of CCP monitoring devices). Examples are provided of equipment and devices used to measure parameters critical to ensure food safety.	Misunderstood
EI 2	Part III FSMS	17.2	Control of measuring and monitoring equipment / devices	The identified equipment / devices shall be regularly calibrated; calibration shall be traceable to a national or international standard or method.		Chapter 8, 9, 10 in the (ORGANISATION) curriculum discuss process preventive controls (CCPs), critical limits, monitoring, and verification (calibration of CCP monitoring devices). Examples are provided of equipment and devices used to measure parameters critical to ensure food safety. The curriculum cites calibration shall be traceable to a national or international standard.	Misunderstood
EI 2	Part III FSMS	19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		(ORGANISATION) curriculum's Chapter 12 and Appendices 5 and 6 address environmental monitoring programs as a means of verification of effective equipment / facility sanitation.	Misunderstood
EI 2	Part III FSMS	19.3	Environmental monitoring	A risk-based approach shall be in place to define the environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		(ORGANISATION) curriculum's Chapter 12 and Appendices 5 and 6 address environmental monitoring programs as a means of verification of effective equipment / facility sanitation.	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 2	Part III FSMS	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.		(ORGANISATION) curriculum's as a chapter dedicated to Recall Management (Chapter 15).	Misunderstood
EI 2	Part III FSMS	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.		The (ORGANISATION) curriculum discussed required corrective actions for all preventive control deviations (process preventive controls- CCPs, allergen preventive controls, sanitation preventive controls, supply-chain preventive controls.	Misunderstood
EI 2	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	The Food Safety Preventive Controls Alliance (FSPCA) would like to petition GFSI for the recognition within the code to accept the FSPCA Preventive Controls for Human Food curriculum (Version 2.0) as an approved HACCP-based training. The FSPCA recognized that in order to reduce redundancy in training requirements for auditors and persons in charge of food safety plan, especially for those operating under the U.S. Food and Drug Administration (FDA) jurisdiction, that it will be advantageous to have the FSPCA Preventive Controls for Human Food (PCHF) standardized curriculum training recognized as a HACCP-based training meeting the precepts laid out for HACCP in the CODEX Alimentarius standard, General Principles of Food Hygiene, CXC 1-1969 (2023). FSPCA recently undertook a significant revision in the curriculum to make this connection more obvious. This updated version, titled PCHF Version 2.0, is scheduled for release in the fourth quarter of 2024. This FSPCA PCHF V2.0 curriculum is recognized by the US FDA as standardized curriculum meeting the requirements for training Preventive Controls Qualified Individual (PCQI) under the Food Safety Modernization Act (FSMA) Preventive Controls for	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 2	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	All HACCP-based systems, including Preventive Controls, are risk- and science-based and provide systematic and comprehensive approach to identifying specific hazards and implementing measures for their control to ensure the safety of food. These are tools used by food operations to assess hazards and establish control systems that focus on control measures for significant hazards along the food chain. The FSPCA PCHF Version 2.0 curriculum takes the same approach to HACCP training as required by the latest version of CODEX Alimentarius General Principles of Food Hygiene. The curriculum covers prerequisite programs including Good Manufacturing Practices; the three types of hazards – biological, chemical, and physical; the five preliminary steps; each of the seven principles; management components; and training. The PCHF curriculum follows the same 12 step approach to HACCP (five preliminary steps and 7 principles) as listed in CODEX CXC 1-1969 Section 19 (2023). These same five preliminary steps are discussed in the introductory chapter of the PCHF Manual and then detailed in Chapter 5 - Preliminary Steps. The same seven principles are addressed in details in the same sequential order in the	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 2	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	The FSPCA PCHF Version 2.0 curriculum is a HACCP-based system meeting the requirements of the latest version of the CODEX Alimentarius General Principles of Food Hygiene, and achieving the same public health outcome as HACCP by protecting the food supply and producing safe food for human consumption. It utilizes the Seven Principles of HACCP, and the general guidelines for the application of HACCP systems, as described in the CODEX CXC 1-1969 (2023) document. In the FSPCA PCHF Version 2.0 curriculum, these seven principles of HACCP are covered for the Critical Control Points / Process Preventive Controls. This coverage of CCPs / Process Preventive Controls are covered in sequential chapters. The elements required for each of the principles (e.g., hazard analysis, critical control points, critical limits, monitoring, corrective action, verification, record keeping) are the same and in the same sequential order as described in the CODEX General Principles of Food Hygiene, CXC 1-1969 (2023) (Annex 1. Table 1).	Opportunity Identified
EI 2	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	The FSPCA PCHF curriculum uses risk- and science-based and provide systematic approach to identifying specific hazards and implementing measures for their controls to ensure the safety of food. This hazard and risk assessment approach is the same as that described in the latest version of the CODEX Alimentarius General Principles of Food Hygiene. The FSPCA PCHF curriculum dedicates Chapters 6 for systematic and comprehensive hazard analysis, and Chapter 7 for determination of critical control points and preventive controls.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 2	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	The FSPCA PCHF curriculum hazard and risk assessment approach is the same as that described in the latest version of the CODEX Alimentarius General Principles of Food Hygiene. Chapter 6 of the FSPCA PCHF curriculum provides a detailed, science-based, systematic and comprehensive system for hazard analysis to identify and evaluate biological, chemical (including food allergens) and physical hazards in ingredients, processes, and foods, including hazards with likelihood of occurrence in the absence of control measures. The FSPCA PCHF curriculum uses the latest version of the US FDA Hazard Guide.	Opportunity Identified
EI 2	Part III HACCP	1.2	Hazard and Risk management system	The scope of the Hazard and Risk Management System shall be defined per product / product category and / or per process or production step.		The scope of the hazard analysis and critical control points/preventive controls management systems in the FSPCA PCHF curriculum follow the same principles as that described in the latest version of the CODEX Alimentarius General Principles of Food Hygiene, and are defined per product / product category and / or per process or production step.	Opportunity Identified
EI 2	Part III HACCP	1.3	Hazard and Risk management system	The Hazard and Risk Management System shall be applicable to the site's scope of certification.		The scope of the hazard analysis and critical control points/preventive controls management systems in the FSPCA PCHF curriculum can be applied to specific production sites, as needed.	Opportunity Identified
EI 2	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	The FSPCA PCHF curriculum references the US FDA FSMA Human Food regulation, a reanalysis of food safety plan is required at least every three years, or whenever there is a significant change in product or process, new information becomes available about potential hazards associated with the food, after an unanticipated food safety problem, and whenever a CCP or preventive control is ineffective. FSPCA Lead Instructors remind trainees of other relevant regulations' requirements of their respective minimum reanalysis frequencies.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 2	Part III HACCP	1.5	Hygienic design process	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new buildings/equipment.	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade or improvements.	The(ORGANISATION) curriculum dedicates Chapter 12: Sanitation Preventive Controls to provide detailed information on the hygienic design of processing equipment and the facility as well as approaches in the control of process-related, facility-related and people-related hazards including environmental hazards and allergens through sanitation preventive control procedures, including hygienic zoning and pathogen environmental monitoring programs.	Misunderstood
EI 2	Part III HACCP	1.6	Hygienic design process	The hygienic design and suitability of buildings and equipment shall be evaluated throughout their life cycle from the design concept, through construction, purchasing and during use, until the end of their intended life.	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.	The evaluation of hygienic design and suitability of new and existing buildings and equipment are discussed in the Good Manufacturing Practice - GMP (Chapter 2), hazard analysis (Chapter 6), food allergen preventive controls (Chapter 11) and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood
EI 2	Part III HACCP	1.7	Risk assessment	A documented hygienic design risk assessment for food safety hazards on new and existing buildings/equipment shall be established, implemented and maintained. It shall include as a minimum the following considerations: intended use, food safety hazard identification, evaluation.		A documented hygienic design risk assessment for food safety hazards on new and existing buildings and equipment can be considered in the GMP (Chapter 2), hazard analysis (Chapter 6), food allergen preventive controls (Chapter 11), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood
EI 2	Part III HACCP	1.8	Risk assessment	The hygienic design risk assessment shall be reviewed when any change to the building/equipment/product/process is made or other hazards arise, or at a minimum frequency defined by applicable laws and regulations.		The (ORGANISATION) curriculum references the US FDA FSMA Human Food regulation, a reanalysis of food safety plan is required at least every three years, or whenever there is a significant change in product or process (including facility or equipment changes), new information becomes available about potential hazards associated with the food, after an unanticipated food safety problem, and whenever a CCP or preventive control is ineffective. It is possible to train FSPCA Lead Instructors to remind trainees of other relevant regulations' requirements of their respective minimum reanalysis frequencies. This is also applicable to hygienic design risk assessment review frequencies.	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 2	Part III HACCP	1.9.1	Intended use	The intended use of the building/equipment shall be specified.		The intended use of the building/equipment on food safety hazards analysis and controls are considered in the GMP (Chapter 2), hazard analysis (Chapter 6), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood
EI 2	Part III HACCP	1.9.2	Intended use	The intended use of the building/equipment shall be described, as a specification for the intended purchase of new buildings and equipment.		The intended use of the building/equipment on food safety hazards analysis and controls are considered in the GMP (Chapter 2), hazard analysis (Chapter 6), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood
EI 2	Part III HACCP	1.10	Hygienic design principles	Appropriate building/equipment hygienic design principles shall be adopted based on the designated risk assessment, appropriate to their intended use and taking into consideration a user specification.		A documented hygienic design risk assessment for food safety hazards on new and existing buildings and equipment are considered in the GMP (Chapter 2), hazard analysis (Chapter 6), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood
EI 2	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.	Hygienic design risk assessment for food safety hazards on new and existing buildings and equipment, including hygienic sanitary design for cleaning objectives, are considered in the GMP (Chapter 2), hazard analysis (Chapter 6), food allergen preventive controls (Chapter 11), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum	Misunderstood
EI 2	Part III HACCP	1.12	Hygienic design principles	Buildings and equipment shall be designed and constructed to avoid favourable growth conditions (for microorganisms, pests and their harbourage), appropriate to their intended use.		Hygienic design risk assessment for food safety hazards on new and existing buildings and equipment, including prevention of favorable microbial growth conditions and pests/pest harborage are considered in the GMP (Chapter 2), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood
EI 2	Part III HACCP	1.13	Hygienic design principles	Buildings and equipment shall be designed to prevent contamination, appropriate to their intended use.		Hygienic design risk assessment for food safety hazards on new and existing buildings and equipment, including prevention of post-processing environmental contamination are considered in the GMP (Chapter 2), hazard analysis (Chapter 6), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
EI 2	Part III HACCP	1.14	Hygienic design principles	Wherever relevant, recognised hygienic design standards/guidance shall be consulted for the design and construction of buildings and equipment, appropriate for their intended use.		Hygienic design risk assessment for food safety hazards on new and existing buildings and equipment are considered in the GMP (Chapter 2), hazard analysis (Chapter 6), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood
EI 2	Part III HACCP	1.15	Hygienic design principles	Appropriate hygienic design principles shall be adopted for the installation of new equipment and construction of buildings at sites handling food.		A documented hygienic design risk assessment for food safety hazards on new and existing buildings and equipment are considered in the GMP (Chapter 2), hazard analysis (Chapter 6), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood
EI 2	Part III HACCP	1.16	Hygienic design principles	Hygienic design principles shall be adopted to ensure the maintenance of the hygienic performance of the buildings/equipment, appropriate for their intended use.		Hygienic design risk assessment for food safety hazards on new and existing buildings and equipment are considered in the GMP (Chapter 2), hazard analysis (Chapter 6), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood
EI 2	Part III HACCP	1.17	Hygienic design mitigation	Appropriate measures (with frequencies) shall be specified, undertaken accordingly and documented to mitigate any remaining food safety risks identified in the hygienic design risk assessment following building/equipment construction, purchase and installation.		A documented hygienic design risk assessment for food safety hazards on new and existing buildings and equipment are considered in the GMP (Chapter 2), hazard analysis (Chapter 6), and sanitation preventive controls (Chapter 12) chapters in the (ORGANISATION) curriculum.	Misunderstood
FS 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Again, I agree with the WG comments. Needs to be clearly defined. I would sugget limiting to change of ownership. Management and technical leadership in the scheme can and will change. It is up to the organization to maintain continuity of compliance with the BMRs. If there is questions about a CPOs ability to maitain continuity of compliance, GFSI should formally request a plan from the CPO. This can be reviewed by the techcomittee if necessary.	Opportunity Identified
FS 1	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.	I do not agree with the WG Membe comment as the lenth of the investigation may not be driven by the CPO.	Agree

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
FS 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process. Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.	I agree with the WG comments. This is a very sensible approach for CPOs that already have GFSI recognized schemes.	Opportunity Identified
FS 1	Part II	1.5	Self-promotion	The certification process shall not be 'self-promoting' or 'self-expanding' by mandating that products or services from the certified organisation shall contain components which are certified under a Certification Programme owned by the Certification Programme Owner.		I think this is a good clause.	Agree
FS 1	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Agree with the comment so of the WG. This should reference clear governance and process. Also: "Outbreak" not "breakout"	Opportunity Identified
FS 1	Part II	3.12	Desktop Assessment	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance on audit and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records.	This should include handling of any complaints regarding auditors or certification process.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
FS 1	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes: Acting with fortitude, Open to improvement, Culturally sensitive, Collaborative (not consulting), Professional, Morally courage, Organized	Good build by the WG	Opportunity Identified
FS 1	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Good build by the WG	Opportunity Identified
FS 1	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	There needs to be some level of c0-ownership with the CB, as they are required to maintain these documents and generate them as their work product.	Couldn't reach consensus
FS 1	Part II	6.21	Site audit sampling	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. 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.	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. 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	Good build by the WG	Couldn't reach consensus
FS 1	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.	I support adding health standards, but not clear on when they wouldn't be applicable.	Couldn't reach consensus

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
FS 1	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	Good build by WG.	Opportunity Identified
FS 1	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Perhaps include: out of service equipment.	Couldn't reach consensus
IND 1	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		For technical issues of high level, for example validation of food safety control measures, it is important for Certification Bodies to count on technical experts with required competence. As an example, technical competence to those describe by IFTPS (2011) for Process Authority role and required in US regulations.	Couldn't reach consensus
IND 1	Part III HACCP	1.9.1	Intended use	The intended use of the building/equipment shall be specified.		In order to avoid possible confusion with the use of the term "intended use" (normally asociated to foods), it is important to be clear with this requirement. I recommend to use an alternative term, such as "intended use for infrastructure" or "intended use of building/equipment".	Couldn't reach consensus
IND 1	Part III HACCP	1.9.2	Intended use	The intended use of the building/equipment shall be described, as a specification for the intended purchase of new buildings and equipment.		The same comment described above.	Misunderstood
IND 2	Part III FSMS	4.1	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation (both countries of production and intended sale).		Procedures shall be established, implemented and maintained to ensure compliance with applicable laws and regulations (both countries of production and intended sale). Rationale: According to Cornell Law School (https://www.law.cornell.edu/wex/legislation), "Legislation refers to the preparation and enactment of laws by a legislative body through its lawmaking process". What food companies need to follow are the regulations written according to their processes and products.	Couldn't reach consensus
IND 2	Part III FSMS	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).		Same as in 4.1	Misunderstood
IND 2	Part III FSMS	4.3	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation.		Same as in 4.1	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 2	Part III FSMS	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.		A food defence threat assessment procedure shall be established, implemented and maintained to identify potential threats and prioritise food defence measures. The assessment must take into consideration the potential health consequence, the level of access and the ability of the attacker to contaminate the food. Rationale: we provide more criteria on how the assessment should be performed to be effectively implemented	Couldn't reach consensus
IND 2	Part III FSMS	19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination. In cases where ready to eat food is exposed to the environment before packaging, the environmentl pathogen of concern must be identified in all steps where such conditions are applicable and the control must be validated. In these cases, the environmental monitoring program is mandatory	Couldn't reach consensus
IND 2	Part III FSMS	19.3	Environmental monitoring	A risk-based approach shall be in place to define the environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		Same as above	Misunderstood
IND 2	Part III FSMS	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.		New title: Corrections, corrective actions and preventive actions (See the definitions in the Glossary plus, I added the definition of a "Preventive Action") A procedure shall be established, implemented and maintained for the determination and implementation of corrections, corrective actions and preventive actions in the event of any significant non-conformity relating to food safety or potential non-conformity	Couldn't reach consensus
IND 2	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant laws and regulations in the country of manufacture and the country of sale	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 2	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence effective of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Opportunity Identified
IND 2	Part III HACCP	1.5	Hygienic design process	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new buildings/equipment.	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade or improvements.	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade, repairs or improvements.	Couldn't reach consensus
IND 2	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet sanitary conditions	Couldn't reach consensus
IND 2	Part IV Glossary	Glossary	Form	Document used to record data required by the quality management system NOTE A form becomes a record when data are entered.	ISO 10013	People need to understand the difference between a form and a record	Couldn't reach consensus
IND 2	Part IV Glossary	Glossary	Preventive action	Action to eliminate the cause of a potential nonconformity (3.6.9) or other potential undesirable situation Note 1 to entry: There can be more than one cause for a potential nonconformity. Note 2 to entry: Preventive action is taken to prevent occurrence whereas corrective action is taken to prevent recurrence.	ISO 9000	Rationale: When analyzing data from the process that indicates there is a chance of having a non-conformity in the future (potential non-conformity), people is supposed to look for the root causes and then, prevent the "occurrence" of the potential non-conformity. Look at Note 2.	Couldn't reach consensus
IND 2	Part IV Glossary	Glossary	Risk	Effect of uncertainty Note 1 to entry: An effect is a deviation from the expected — positive or negative. Note 2 to entry: Uncertainty is the state, even partial, of deficiency of information (3.8.2) related to, understanding or knowledge of, an event, its consequence, or likelihood. Note 4 to entry: Risk is often expressed in terms of a combination of the consequences of an event (including changes in circumstances) and the associated likelihood (as defined in ISO Guide 73:2009, 3.6.1.1) of occurrence.	ISO 9000	If the activities performed by the food safety management systems are based on risk, this definition should be here	Agree
IND 2	Part IV Glossary	Glossary	System	Set of interrelated or interacting elements.	ISO 9000	Rationale: if schemes are asking for the development and implementation of systems, we should have this definition in the Glossary	Couldn't reach consensus
IND 2	Part IV Glossary	Glossary	Work Instruction	Detailed descriptions of how to perform and record tasks NOTE 1 Work instructions may be documented or not. NOTE 2 Work Instructions may be, for example, detailed written descriptions, flowcharts, templates, models, technical notes incorporated into drawings, specifications, equipment instruction manuals, pictures, videos, checklists, or combinations thereof. Work instructions should describe any materials, equipment and documentation to be used. When relevant, work instructions include acceptance criteria.	ISO 10013	In some cases, systems, procedures need to have more details and work instructions are used	Couldn't reach consensus
IND 3	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	At least 2 makes sense.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 3	Part II	1.14	Certification Programme Development and Maintenance	The Certification Programme's normative documents shall be appropriately controlled and publicly available. The documents submitted to GFSI shall be translated into English and their translation appropriately controlled.		CPO normative documents shall be publicly and freely available. *Note: Users shouldn't pay anything to get the CPO normative documents.*	Couldn't reach consensus
IND 3	Part II	2.7	Relationship with Accreditation Bodies	The Certification Programme Owner shall inform Accreditation Bodies if activities with a Certification Body is withdrawn or suspended for reasons related to the requirements of the accreditation standard.		In addition: The CPO shall have a process in place to make sure that ABs are consulted during CP review (to ensure, among others that CP requirements don't contradict or exclude any AB requirements).	Opportunity Identified
IND 3	Part II	2.9	Relationship with Accreditation Bodies	The Certification Programme Owner shall agree on their process for the extension of the scope of activities of Certification Bodies with the Accreditation Bodies.		This process should be harmonized across all Accreditation Bodies.	Opportunity Identified
IND 3	Part II	2.11	Certification Bodies Requirements	The Certification Programme Owner shall have documented requirements for Certification Bodies to operate the Certification Programme.		Isn't it implicit, as CPOs shall have publicly available normative documents? Consider removing.	Couldn't reach consensus
IND 3	Part II	2.13	Accreditation of Certification Bodies	The Certification Programme Owner shall define clear scope(s) of accreditation for the Certification Bodies.		This requirement is not clear in terms of what needs to be checked at the CPO level. Maybe clause 2.14 is enough.	Couldn't reach consensus
IND 3	Part II	2.16	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the accreditation standard used by all Accreditation Bodies for their Certification Programme is consistent and, where appropriate, facilitates a harmonised agreement on behalf of the contracted Certification Bodies.		What is the "accreditation standard"? This should be clarified and harmonized across all ABs.	Opportunity Identified
IND 3	Part II	2.18	Accreditation of Certification Bodies	In the event that accreditation is not granted within 12 months, the Certification Programme Owner shall ensure that the Certification Body contract shall be terminated, and potential actions reviewed. In situations where there is a delay, the Certification Body shall provide a plan to the Certification Programme Owner for approval to achieve accreditation.		In the event that accreditation is not granted within 12 months, the Certification Programme Owner shall ensure that the Certification Body contract shall be terminated, and potential actions reviewed. Exemptions may be accepted, based on objective criteria, and ~~If situations where there is a delay,~~ the Certification Body shall provide a plan to the Certification Programme Owner for approval to achieve accreditation.	Opportunity Identified
IND 3	Part II	2.19	Accreditation of Certification Bodies	If a Certification Body has a pending application for extension of their scope with an Accreditation Body, the Certification Body shall inform the Certification Programme Owner. The Certification Programme Owner shall acknowledge and hold written notification from the Certification Body of such a circumstance.		Last sentence is too prescriptive, consider removing (why requiring written notification here, but not for other requirements?).	Opportunity Identified
IND 3	Part II	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 ensure that the Certification Body makes clearly and publicly available the limits and scope of their accreditation.		Not clear what is the intention.	Opportunity Identified
IND 3	Part II	2.21	Accreditation of Certification Bodies	In the event that the range of certification services offered by a Certification Body is wider than those accredited, the Certification Programme Owner shall ensure that those are transparent, not conflicting and distinguished from those that are accredited.		Not clear what is the intention.	Opportunity Identified
IND 3	Part II	3.2	Relationship with Certification Bodies	The Certification Programme Owner shall require that Certification Bodies notify them of any withdrawal or suspension of their accreditation.		In addition: *The CPO shall define a m* inimum timeframe before a company can apply again for certification after a suspension.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 3	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		Why should the CPO ensure that? Most important for a CPO is that the CB has signed a contract and fulfills CPO requirements. Implementation of a quality system is implicit through ISO/ IEC 17021/ 17065 accreditation and is assessed by Accreditation Bodies. Consider removing.	Couldn't reach consensus
IND 3	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Very nice addition, which provides more clarity on when should the CPO interact with CBs.	Opportunity Identified
IND 3	Part II	3.11	Integrity Programme	The Certification Programme Owner shall ensure that results of the integrity programme are communicated to and reviewed with the Certification Bodies at least once a year.		CPO shall ensure that any decision on criticity of CB non-conformities regarding compliance/ integrity shall be made in full impartiality (e.g. through a Committee or independent experts).	Couldn't reach consensus
IND 3	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		The Certification Programme Owner shall ensure that all ~~management, administrative, technical and auditing~~ personnel involved in the certification process meet the competence required by the ~~Certification Bodies, the~~ Certification Programme ~~and the GFSI Benchmarking Requirements.~~ *Note: Checking the compliance of CB/ GFSI requirements is made by either the CB (internal audit), or ABs or GFSI Benchmark Leaders. Scope of liabilities should be clarified.*	Couldn't reach consensus
IND 3	Part II	4.2	Certification Body Personnel Competence	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: - Complying with the rules of the Certification Body, with particular reference to confidentiality and independence from commercial or personal interests; - Declaring any issues in relation to personal conflicts of interest.		This is redundant with Accreditation requirements. Suggest removing.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 3	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		This is redundant with Accreditation requirements. Suggest removing.	Couldn't reach consensus
IND 3	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	Consider harmonizing and streamlining the witness audit process across all CPOs. This is redundant from one CPO to another, time consuming and expansive for CBs and could be streamlined at GFSI level (e.g. only one witness audit, performed against only one GFSI recognized CP, which would be accepted/ recognized by all CPs?)	Opportunity Identified
IND 3	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	Agree to request: - a minimum frequency of witness audits - at least one portion on site - minimum competence of witness auditors (technical competence, language, etc.).	Opportunity Identified
IND 3	Part II	4.10.2	Initial Auditor Qualification	The Certification Programme Owner shall ensure that the witness audit(s) carried out as part of the certification body's initial auditor qualification follows the standard audit plan agreed with the certified organisation, including the use of ICT if applicable, as long as this does not compromise the effectiveness of the assessment. The Certification Programme Owner shall ensure that the witness assessor is present on site for parts of the audit carried out on site.	Suggest to introduce a distinction for 1st approval where the entire witness audit should be conducted on site (no permitted use of ICT).	Include competence criteria for witness auditor.	Opportunity Identified
IND 3	Part II	4.12	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that auditors are regularly trained and evaluated on their understanding of the Certification Programme.		In addition: CPO shall require and ensure that CBs implement calibration exercises/ training to maintain good understanding of CP requirement interpretation.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 3	Part II	5.1	Audit Programme – scope of the audit	The Certification Programme Owner shall ensure that the Certification Bodies clarify the activities and products of the audited organisation to include in the scope of the audit.		Not clear. Proposal: The Certification Programme Owner shall provide rules to ~~the~~ Certification Bodies on the level of details related to activities and products of the audit scope ~~clarify the activities and products of the audited organization~~ to include in the scope of the audit.	Couldn't reach consensus
IND 3	Part II	5.2	Audit Programme – audit frequency	The Certification Programme Owner shall have a clearly defined and documented audit frequency programme: • Ensuring a minimum audit frequency of one full audit of an organisation's facility and food safety management system against the elements of the Certification Programme's normative documents per 12-month period on average; • Defining the frequency of audit for each product category covered by the scope of certification of the Certification Programme; • Defining a time window during which next recertification audit shall be conducted; • Considering a number of factors to decide the audit frequency such as activities and products of the audited organisation to include in the audit (scope of the audit), previous audit history, concerns about compliance with a Certification Programme's normative documents, seasonality of product, significant capacity increases, structural changes, changes in product technology or changes in product type. The Certification Programme Owner shall clearly define the rationale for the determination of frequency within the Certification Programme.		In addition: CPO shall define a time window during which next audit (recertification/ surveillance) can be performed to ensure certification continuity. Outside this time window, certification cycle shall start as new.	Couldn't reach consensus
IND 3	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	More requirements should be provided on unannounced audits, to avoid too many different practices across all CPOs (e.g. maximum time before being on the floor, what should be audited first when arriving, etc.).	Opportunity Identified
IND 3	Part II	5.12	Audit Programme – auditor selection	The Certification Programme Owner shall ensure that Certification Bodies have rules for the appointment of auditors to audits to ensure impartiality, including rotation of auditors.		Include a frequency for auditor rotation (e.g. every 3 audits). In addition: In case the CPO allows "pre audits", clear rules shall be defined for CBs to avoid any partiality and/ or independency issues.	Couldn't reach consensus
IND 3	Part II	5.17	Audit Reporting	The Certification Programme Owner shall ensure that the audit report contains evidence that all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit and clearly express the outcome of the evaluation.		It would be interesting to investigate on the key info that is important in an audit report for report readers. The current trend is that CPOs require more and more content in the reports (from 20 to 70 pages!), which is time consuming for auditors, whereas at the end many customers don't even read the reports.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 3	Part II	5.26	Management of Certification	The Certification Programme Owner shall ensure that Certification Bodies have in place a clearly defined and publicly available appeals procedure.		Already included in Accreditation requirements. Suggest removing.	Couldn't reach consensus
IND 4	Part II	1.18	Documentation requirement	The Certification Programme Owner shall establish, implement and maintain a Quality Management System.		The latest version of the ISO standard and FSSC require Food manufacturers to have two continuous improvement cycles in place - one for the operations and one for the overall management system. The new BMR should require Certification Program Owners to have 2 continuous improvement cycles. Both of these should be based on Performance metrics and data.	Couldn't reach consensus
IND 4	Part II	1.19	Complaint procedure	The Certification Programme Owner shall implement an effective documented complaint procedure. This procedure shall be publicly available without request.		CPOs should also operate an effective investigation system for all cases where a FBO holding a valid certificate is subject to a food safety recall. All cases must be investigated and the investigation reports made available to GFSI.	Couldn't reach consensus
IND 4	Part II	1.20	Data Management	The Certification Programme Owner shall have in place a clearly defined data management system holding and maintaining data for the effective management and operation of the Certification Programme.		The data management system should include, Certifications held, audit body responsible for the audit, data of issuing and expirey of certificate. The data held and easily available should also include all Key performance metrics relating to the CPOs operations	Couldn't reach consensus
IND 4	Part II	1.22	Data Management	The Certification Programme Owner shall have a process in place to verify the authenticity of the certificate.		The new BMR should require Certification Program Owners to have 2 continuous improvement cycles. Both of these should be based on Performance metrics and data.	Couldn't reach consensus
IND 4	Part II	1.23	Internal Review	The operations of the Certification Programme Owner shall be subject to formal annual internal review of its relevance and compliance to internal processes, and, where appropriate, revised.		The CPO shall subject itself to na annual review carried out be GFSI. In addition GFSI will select na external audit organisation competent in auditing management systems and processes to carry out a review of upto 4 CPOs per year. The CPOs selected is entirely at the discretion of GFSI	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 4	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	CPOs should also operate an effective investigation system for all cases where a FBO holding a valid certificate is subject to a food safety recall. All cases must be investigated and the investigation reports made available to GFSI.	Opportunity Identified
IND 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	agree with WG member comments	Opportunity Identified
IND 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Reduce the required number of certificates for new scopes of already benchmarked programs so long as there are 2 committed CBs and demonstrated interest (certification in process)	Opportunity Identified
IND 5	Part I	1	Eligibility Criteria	These certificates shall be issued against the version of Certification Programme concerned by the application,		This seems impractical given that the 10 current certificates were likely issued during development of the version up for application and not yet due for renewal under the new version that has been updated to meet the most recent BMR..	Opportunity Identified
IND 5	Part I	1	Eligibility Criteria	A Certification Programme is deemed to become operational on the date on which the first accredited certificate is issued by a Certification Body,		I would change this to say operational =end date of first completed audit. It is at that stage where "mangement" begins.	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner does not have any practises deemed as restricting access to markets,		examples would be helpful	Opportunity Identified
IND 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner has undertaken a self-assessment to validate that it is in alignment with the GFSI Benchmarking Requirements.		should this be "internal audit" so that it is an indpendant assessment?	Couldn't reach consensus
IND 5	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	The WG member comment doesn't seem to march up with the element.	Agree
IND 5	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		"significant changes" examples should be provided. What situations only require a notifiation of change to GFSI vs. an application for continued recognition?	Opportunity Identified
IND 5	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.	Is this comment aligned with the element?	Misunderstood
IND 5	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Is the "Matter in dispute" the suspension or withdrawal, or the event that led to suspension or withdrawal? It could be well beyond 30 days past the offending event by the time a suspension occurs.	Misunderstood
IND 5	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	What about using a professional mediator to manage the appeal review?	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 5	Part I	6	Sanctioning	This recommendation is passed to the GFSI Executive Director and the GFSI Board for final decision. The GFSI Technical Manager will inform the Certification Programme Owner of this final decision, including a full explanation for it.		Change GFSI Board to "GFSI Steering Committee)	Agree
IND 5	Part I	6	Sanctioning	Once the realignment is confirmed, the GFSI Technical Manager will inform the GFSI Executive Director and the GFSI Board.		Correct "Board" to Steering Committee in all places in appears	Agree
IND 5	Part III FSMS	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.		Including top management responsible for the entire facilty operation.	Couldn't reach consensus
IND 5	Part III FSMS	4.1	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation (both countries of production and intended sale).		"applicable food safety legislation"	Couldn't reach consensus
IND 5	Part III FSMS	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).		"applicable food safety legislation"	Couldn't reach consensus
IND 5	Part III FSMS	4.3	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation.		"applicable food safety legislation"	Couldn't reach consensus
IND 5	Part III FSMS	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.		"...business activities to be included in the scope of certification"	Couldn't reach consensus
IND 5	Part III FSMS	9.2.1	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the food if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.		"shelf life plus 1 year"	Couldn't reach consensus
IND 5	Part III FSMS	13.1.3	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 regulatory requirements.		Duplicate of 3.1.2	Misunderstood
IND 5	Part III FSMS	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.	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 - add intended consumption as well?	I don't agree to add Intended Consumption. Adds confusion and complexity that the site has little control over.	Couldn't reach consensus
IND 5	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	Agreed, in addition a packaging design change control process so that changes in graphics (lgends, warrnings, photos, claiims, etc.) are not inadvertanbly changed without a version change for control procedures for correct ordering and reference of updated labels..	Agree
IND 5	Part III FSMS	19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		The program shall include food-contact and non-food contact surfaces in primary and secondary production areas	Couldn't reach consensus
IND 5	Part III FSMS	19.3	Environmental monitoring	A risk-based approach shall be in place to define the environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		The program shall include food-contact and non-food contact surfaces in primary and secondary production areas	Couldn't reach consensus
IND 5	Part III FSMS	20	Internal audit	An internal audit procedure shall be established, implemented and maintained; it shall cover all elements of the Food Safety Management System.		what about for brokers? An audit of finacials should be completed and the outcomes made available to certificaiton body.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 5	Part III GAP	1	Land used for production	Land used for production shall be evaluated for hazards and contamination. Control measures shall be implemented to reduce hazards to acceptable levels.		"shall be considered in the hazard analysis in development of the HACCP based food safety system.	Couldn't reach consensus
IND 5	Part III GAP	3.2	Location, design and layout	All buildings shall be marked to indicate that they contain livestock and that no entry to unauthorised persons is permitted.	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning, disinfection and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	I think the WG comment is in the wrong cell, should be in 3.1.	Agree
IND 5	Part III GAP	4.5	Prevention of cross-contamination	There shall be a provision for handling product that has dropped to the ground.		"to minimize the risk of food safety "	Couldn't reach consensus
IND 5	Part III GAP	5	Employee facilities	Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.		"provide and practically accessible (not so distant from work areas that it creates a barrier to accessing within the time allowed for breaks)	Couldn't reach consensus
IND 5	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.	hygiene standards shall include guidelines for permitted time off work due to illness before any effect on employment status is considered.	Couldn't reach consensus
IND 5	Part III GAP	6.3.1	Personnel health and hygiene	People known or suspected to be suffering from or to be a carrier of a disease or illness likely to be transmitted through produce shall not be allowed to enter any food handling area. Any person so affected shall immediately report illness or symptoms of illness to the management.		"there shall be no repercussions on employed status due to reporting an illness and calling off sick within the guidelines established by the organization or labor service provider"	Couldn't reach consensus
IND 5	Part III GAP	7.2	Personnel training	Agricultural workers who apply agricultural chemicals shall be trained and qualified in the proper application procedures of such chemicals.		"and shall be supplied with the necessary protective equipment to prevent contact with substances harmful to human health"	Couldn't reach consensus
IND 5	Part III 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, equipment and post-harvest washing, with appropriate facilities for its storage and distribution.	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.	"distribution and disposal"	Couldn't reach consensus
IND 5	Part III GAP	12.1	Waste management	The collection, storage and disposal of waste material, including waste water and drainage when applicable, shall not represent any food safety risks.		"or hazard to surrounding environmnent, wildlife, and waterways"	Couldn't reach consensus
IND 5	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.		include "prevention of pest harborage"	Couldn't reach consensus
IND 5	Part III 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 should be recorded and verified.	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 be recorded and verified.	validation of cleaning procedures?	Couldn't reach consensus
IND 5	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Add that any purchased materials must be specified as food grade.	Couldn't reach consensus

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
IND 5	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	"and comply with regulations in the country of sale"	Opportunity Identified
IND 5	Part III GMP	12.2	Waste management	A system shall be in place to control the disposal of trademarked material.		"to prevent theft and unintentional or intentional use of unapproved materials"	Opportunity Identified
IND 5	Part III GMP	15	Transport	All containers and vehicles used for transportation in a way that could impact food safety shall be designed, constructed and maintained to minimise food safety risks. They shall be suitable for the intended purpose		include requirement to verify cleaning of storage and transport vessel after prior loads.	Couldn't reach consensus
IND 5	Part III GMP	17	Stock management	A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.		such as "first in, first out"	Couldn't reach consensus
IND 5	Part III GMP	19	Maintenance	Effective planned maintenance shall be in place for the site and equipment to minimise food safety risks. Maintenance activities shall not represent food safety risks.		"maintenance activities shall be documented and appropriate sanitation following maintenance verified and documented".	Couldn't reach consensus
IND 5	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	or say "including all relevant biological, chemical, physical and radiological hazards introduced by the environment, product, process, ingredients, suppliers, personnel and equipment. "	Opportunity Identified
IND 5	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	Conflicts with 1.1.2 - Is it "shall" or "may"?	Opportunity Identified
IND 5	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	"hazard ***identification*** and risk assessment"	Opportunity Identified
IND 5	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	This one is my preferred, but you should say "hazard identificiation..." and include "***and severity of consequences in the absense of control measures*** "	Opportunity Identified
IND 5	Part III HACCP	1.2	Hazard and Risk management system	The scope of the Hazard and Risk Management System shall be defined per product / product category and / or per process or production step.		Merge 1.2 and 1.3 to say "*The Hazard and Risk Management System shall be applicable to the site's scope of certification and shall be defined according to the site's product / product category and / or process or production step* "	Opportunity Identified
IND 5	Part III HACCP	1.3	Hazard and Risk management system	The Hazard and Risk Management System shall be applicable to the site's scope of certification.		This statement is confusing standing on its own. I think it should not be a sperate requirement from 1.2. It should be part of the sentence in 1.2.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 5	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	The Hazard and Risk Management System shall be reviewed at least annually, or more frequently as needed in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes (e.g. maintenance, facility damage, equipment failure, pest pressure, changes in suppliers, ingredients, formulations, processes, new product additions)	Opportunity Identified
IND 5	Part III HACCP	1.7	Risk assessment	A documented hygienic design risk assessment for food safety hazards on new and existing buildings/equipment shall be established, implemented and maintained. It shall include as a minimum the following considerations: intended use, food safety hazard identification, evaluation.		A documented hygienic design risk assessment for food safety hazards on new and existing buildings/equipment/processes shall be established, implemented and maintained. It shall include as a minimum the following considerations: intended use, food safety hazard identification, evaluation.	Couldn't reach consensus
IND 5	Part III HACCP	1.10	Hygienic design principles	Appropriate building/equipment hygienic design principles shall be adopted based on the designated risk assessment, appropriate to their intended use and taking into consideration a user specification.		Consider adding a clause for consideration of animal living conditions and welfare such that food safety is not impacted.	Couldn't reach consensus
IND 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	what constitutes 'an agreement'? What evidence is needed? Better wording of 'evidence available of a minimum of one AB accrediting the scheme / or a CB operating xxx' Evidence available of Certification Bodies accredited by one or more Accreditation Bodies to ISO / IEC 17065 or ISO / IEC 17021 for the scope of the Certification Programme	Opportunity Identified
IND 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Agree minimum of two, however still need to take into account offer of the Cb ref geography and scope otherwise it could still constitute a monopoly. Favour more than one CB in any case otherwise likely in reality it is the CB managing the scheme rather than the CPO	Agree
IND 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Agree with WG comments therefore requirement to be deleted	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 6	Part I	1	Eligibility Criteria	• There is commitment from a minimum of three organisations representing the retail / food service or producing / manufacturing sectors to use the Certification Programme,		what constitutes 'a commitment'? What evidence is needed? Better wording of 'evidence available of use / specifying of the CP by 3 organisations' Evidence of a minimum of three organisations representing the retail / food service or producing / manufacturing sectors using or specifying use of the Certification Programme,	Couldn't reach consensus
IND 6	Part I	1	Eligibility Criteria	These certificates shall be issued against the version of Certification Programme concerned by the application,		Agree with WG comments therefore requirement to be deleted	Misunderstood
IND 6	Part II	1.16	Certification Programme Development and Maintenance	The Certification Programme Owner shall inform key stakeholders, including GFSI, of any changes to the Certification Programme, in particular those changes that are relevant to the recognition status of the Certification Programme.		The impact of changes to current bechmarking requirements shall be assessed to confirm validity of benchmark status. CPOs shall cover the costs of any additional work	Couldn't reach consensus
IND 6	Part II	1.21	Data Management	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: •Number of qualified auditors; •Number of valid certificates; •Number of issued certificates within a given period; •Number of suspended certificates; •Number of withdrawn certificates.		Suggest remove 'estimate' and this clause should not just focus on 'numbers' but the system should be able to have accurate details. The Certification Programme Owner shall ensure that the data management system shall incorporate data in relation to the GFSI Benchmarking Requirements and GFSI reporting requirements. This system shall allow accurate details of: •Qualified auditors; •Valid certificates; •Issued certificates within a given period; •Suspended certificates; •Withdrawn certificates.	Couldn't reach consensus
IND 6	Part II	1.22	Data Management	The Certification Programme Owner shall have a process in place to verify the authenticity of the certificate.		The Certification Programme Owner shall have a publicly available process in place for stakeholders to verify the authenticity of the certificate and confirm its GFSI recognition status.	Couldn't reach consensus
IND 6	Part II	2.4	Relationship with Accreditation Bodies	The Certification Programme Owner shall establish regular exchanges and communication with their respective Accreditation Bodies. This shall include an agreement with the Accreditation Bodies to ensure accredited Certification Bodies comply with the requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003.		Section 2 seems to be out of order to me, jumping around requirements for ABs and CBs and sometimes repetitive. Reorder to point 2.7 The Certification Programme Owner shall formally appoint a representative in charge of contact with the Accreditation Bodies. The Certification Programme Owner shall establish regular exchanges and communication with their respective Accreditation Bodies.	Opportunity Identified
IND 6	Part II	2.5	Relationship with Accreditation Bodies	The Certification Programme Owner shall formally appoint a representative in charge of contact with the Accreditation Bodies.		combined with point 2.4 above	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 6	Part II	2.6	Relationship with Accreditation Bodies	The Certification Programme Owner shall have an agreement with the Accreditation Bodies to ensure that the Certification Programme Owner is informed if a Certification Body has its accreditation withdrawn or suspended.		Reorder to 2.8 Difficult to audit what constitutes and 'agreement'. European ABs also resistant to signing anything. The Certification Programme Owner shall ensure the appropriate mechanism is in place with the Accreditation Bodies to ensure that the Certification Programme Owner is informed of Certification Body accreditation applications, and where an accredited Certification Body has its accreditation withdrawn or suspended.	Opportunity Identified
IND 6	Part II	2.7	Relationship with Accreditation Bodies	The Certification Programme Owner shall inform Accreditation Bodies if activities with a Certification Body is withdrawn or suspended for reasons related to the requirements of the accreditation standard.		Reorder to 2.9	Couldn't reach consensus
IND 6	Part II	2.8	Relationship with Accreditation Bodies	The Certification Programme Owner shall inform Accreditation Bodies of any relevant information and developments related to the Certification Programme.		Reorder to 2.10	Couldn't reach consensus
IND 6	Part II	2.9	Relationship with Accreditation Bodies	The Certification Programme Owner shall agree on their process for the extension of the scope of activities of Certification Bodies with the Accreditation Bodies.		Reorder to 2.6 Suggest better wording on expectation to be better auditable. The Certification Programme Owner shall document their requirments for the process of extension of the scope of activities of Certification Bodies ensuring this is followed by the Accreditation Bodies.	Opportunity Identified
IND 6	Part II	2.10	Certification bodies list	The Certification Programme Owner shall ensure that a list of active Certification Bodies is publicly available without request. This list shall include the scope of activities of the Certification Bodies.		Reorder to 2.12	Couldn't reach consensus
IND 6	Part II	2.11	Certification Bodies Requirements	The Certification Programme Owner shall have documented requirements for Certification Bodies to operate the Certification Programme.		Reorder to 2.13	Couldn't reach consensus
IND 6	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.		reorder to point 2.4	Couldn't reach consensus
IND 6	Part II	2.13	Accreditation of Certification Bodies	The Certification Programme Owner shall define clear scope(s) of accreditation for the Certification Bodies.		Reorder to 2.11 and combine with 2.15 below	Couldn't reach consensus
IND 6	Part II	2.15	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies undertaking audits against a GFSI-recognised Certification Programme have the named Certification Programme and its revision number included in their scope of accreditation.		Reorder to 2.11 and combine with 2.13 The Certification Programme Owner shall ensure that the scope of accreditation of Certification Bodies is clearly defined, has the named Certification Programme and its revision number included in their scope of accreditation.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 6	Part II	2.16	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that the accreditation standard used by all Accreditation Bodies for their Certification Programme is consistent and, where appropriate, facilitates a harmonised agreement on behalf of the contracted Certification Bodies.		Reorder to point 2.5 and combined part of 2.4 The Certification Programme Owner shall ensure that the accreditation standard used by all Accreditation Bodies for their Certification Programme is consistent and, where appropriate, facilitates a harmonised process on behalf of the contracted Certification Bodies to ensure accredited Certification Bodies comply with the requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003.	Opportunity Identified
IND 6	Part II	2.17	Accreditation of Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies seeking accreditation for the Certification Programme shall be accredited within 12 months from the date of application to an Accreditation Body.		Reorder to 2.18	Couldn't reach consensus
IND 6	Part II	2.18	Accreditation of Certification Bodies	In the event that accreditation is not granted within 12 months, the Certification Programme Owner shall ensure that the Certification Body contract shall be terminated, and potential actions reviewed. In situations where there is a delay, the Certification Body shall provide a plan to the Certification Programme Owner for approval to achieve accreditation.		Reorder to 2.19 In situations where there is a delay and accreditation is not granted within 12 months, the Certification Programme Owner shall have a formal process in place to agree with the Certification Body an appropriate plan with defined timeline in which to achieve accreditation. NB reality of delays are usually because of lack of AB resources in undertaking the process steps of witness audits and office audits. It does not make sense to state that immediate termination after 12 months should take place but still expect an action plan. Would depend on circumstances - need a tailored and justified action plan	Opportunity Identified
IND 6	Part II	2.19	Accreditation of Certification Bodies	If a Certification Body has a pending application for extension of their scope with an Accreditation Body, the Certification Body shall inform the Certification Programme Owner. The Certification Programme Owner shall acknowledge and hold written notification from the Certification Body of such a circumstance.		Reorder to 2.15	Opportunity Identified
IND 6	Part II	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 ensure that the Certification Body makes clearly and publicly available the limits and scope of their accreditation.		Reorder to 2.16	Opportunity Identified
IND 6	Part II	2.21	Accreditation of Certification Bodies	In the event that the range of certification services offered by a Certification Body is wider than those accredited, the Certification Programme Owner shall ensure that those are transparent, not conflicting and distinguished from those that are accredited.		Reorder to 2.17	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 6	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Seems to be lacking some details - need to cross reference with 1.21. Care when talking about certified versus audited The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes received and relevant documented procedures; - A comprehensive list of all audited organisations against the scope(s) of the Certification Programme confirming their audit outcome. - Accurate list of auditors and the basis of their competenc e approval	Couldn't reach consensus
IND 6	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	This cannot be limited to food safety incidents but must be expanded to include auditor, CB and CPO risks such as reputational damage, fraud. May also consider wider context than food safety as incidents not strictly related to safety eg quality also risks reputational damage.	Opportunity Identified
IND 6	Part II	3.8	Relationship with Certification Bodies	The Certification Programme Owner shall inform Certification Bodies of any relevant information and developments related to the Certification Programme. This shall include any changes to the Certification Programme.		The Certification Programme Owner shall have appropriate mechanisms in place to keep Certification Bodies informed in a timely manner of any relevant information and developments related to the Certification Programme. This shall include any changes to the Certification Programme and clear instruction and timelines of impact for Certification Bodies to adjust their processes.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 6	Part II	3.10	Integrity Programme	The Certification Programme Owner shall implement a risk-based programme to monitor and regularly review the performance of Certification Bodies, and their compliance to the Certification Programme's requirements. This programme shall consider the number, size and complexity of audits carried out by the Certification Bodies.		Should it be considered whether witness audits and site visits are a requirement of the risk based integrity programme? There is currently a disparity between the activities of CPOs Suggest to clearly reference any concession/exemption/exception processes - majority of CPOs have them. Something like 'CPO shall have clearly defined exception circumstances with a documented process of approval and tracking that shall be justified and appropriate but shall not undermine that the GFSI requirements are met in full'	Couldn't reach consensus
IND 6	Part II	3.11	Integrity Programme	The Certification Programme Owner shall ensure that results of the integrity programme are communicated to and reviewed with the Certification Bodies at least once a year.		Seems to be a 'so what' missing here - need to take some action! The Certification Programme Owner shall ensure that results of the integrity programme are communicated to and reviewed with the Certification Bodies at least once a year. Appropriate improvement plans shall be agreed, documentedand monitored.	Couldn't reach consensus
IND 6	Part II	3.12	Desktop Assessment	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance on audit and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records.	Again some action please. The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records to demonstrate continuing compliance with GFSI requirements. Where improvement is required, appropriate action plans shall be documented and actioned.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 6	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		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. Risk factors shall include, but is not limited to: - 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; - product recalls; - number of relevant complaints.	Couldn't reach consensus
IND 6	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	Agree programme should be public to allow stakeholders to make informed decisions. suggested wording. The Certification Programme Owner shall have publicly available, clearly defined Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year. Where improvement is required, appropriate action plans shall be documented and demonstrably actioned. The output of performance shall be publicly available against the corresponding Certification Body.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 6	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	Suggest mechanisms should be broadened to include ongoing review and split the requirement into 2, one for the mechanism and then a list of the attributes. 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 include evaluation through a defined ongoing witness audit process as well as ongoing assessment through audit report reviews and feedback mechanisms such as complaints. This shall confirm ongoing acceptable auditor performance as specified by the Certification Program Owner.	Opportunity Identified
IND 6	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	Wouldn't get into detail of dictating how witness audits should be undertaken and frequency, they are one element of a good programme and how it is used depends on the rest of the system	Opportunity Identified
IND 6	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	New clause: By exception, where the requirement for a relevant degree subject or eqivalent higher education course cannot be met, the Certification Programme Owner shall have a defined process to assess potential auditors relevant industry experience and accept at least 10 years experience in lieu of the degree qualification.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
IND 6	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall have a defined process for initial auditor qualification appropriate to the given certification programme which shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for. This shall include at least one final witness audit to confirm they are assessed as competent. The Certification Programme Owner shall define the expectations of carrying out the witness audit including the qualifications of the witness assessor. NB Need a GFSI definition for 'witness audit' for clarity of expectation. Note there will be a disparity between CPOs that 'combine' their certification programme eg BRCGS or IFS with distinct Standards and FSSC and SQF where Packaging or Logistics are a subset of the Food Standard	Opportunity Identified
IND 6	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	The Certification Programme Owner shall have a defined process for an auditor extending his scope of activity to undergo a programme including training in the new sector and at least one witness audit to sign off as competent by the Certification Body. The witness audit may be undertaken by the use of ICT. NB Auditors are generally signed off in a number of sectors - if they are registered initially they only have to have the 3 assessments to get signed off for all, but if they add something at a later date having to do another 3 assessments for an auditor already deemed competent is excessive. Also note comment of BRCGS/IFS versus FSSC/SQF programme design	Opportunity Identified
IND 6	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Would the auditor be likely to know all the relevant country (s) of sale prior to going to an audit? Is this a reasonable expectation? Auditors should be able to challenge the site to be able to demonstrate knowledge of such laws and regulations	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 6	Part II	4.15	Maintenance of Auditor Skills and Competence	In specific situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.		I suggest this is an overused exception, therefore needs to make clear it is an exception and that the exceptions are defined so that this is challengeable. As an exception, in specific defined situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.	Opportunity Identified
IND 6	Part II	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 during the office visit.		Do we need more robust requirements to outline that auditor information may be shared with GFSI eg specifying in contracts? 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 on request.	Opportunity Identified
IND 6	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Reword for clarity and more easily auditable. The Certification Programme Owner shall have a defined process for Certification Bodies to assess the impact to continued certification and undertake additional investigation activities if there is evidence or suspicion of non-conformity within a certified organisation. This may include additional onsite audits.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 6	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	There are operational challenges for this clause, so need to review to make clear expectation. Picking up subcommittee suggestions to reword: NEW CLAUSE: For scopes AI, AII, BI, BII and BIII, the Certification Programme Owner shall ensure that Certification Bodies perform at a minimum 10% of audits with 48 hours announced per year or one audit every 4 years with 48 hours announced for each certified organisation. NB Include definition of 48 hours announced audit NEW CLAUSE: (For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I), In very exceptional circumstances where clause 5.6 cannot be met, the Certification Programme Owner shall have a defined process to allow short announced audits of maximum 14 calendar days, once every 3 years for specific certified organisation. The Certification programme Owner shall have a clearly defined process allowing the exception only in situations of personnel safety or logistical travel reasons such as lack of transport other than by the site. Justifications shall be fully documented. Alternatively make clear on new clause: (For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I), Where clause 5.6	Opportunity Identified
IND 6	Part II	5.21	Management of Certification	The Certification Programme Owner shall ensure that Certification Bodies have a tool in place to evaluate conformance with the Certification Programme's audit requirements.		What is the expectation here? Not clear - suggest needs more detail on the intent	Couldn't reach consensus
IND 6	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	The Certification Programme Owner shall specify the information required on the certificate which shall include GFSI recognition status. NB linked to 1.22	Couldn't reach consensus
IND 6	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	agree need a timescale	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
IND 6	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Multisite is about issuing a certificate to sites that have not been audited based on sampling of the whole organisation. Suggestion to make distinction of terminology where a single certificate is issued to a site based on an audit carried out at several locations.	Opportunity Identified
IND 6	Part II	1.4	Ownership	The Certification Programme Owner shall not provide any consultancy on their Certification Programme.			Opportunity Identified
IND 6	Part II	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 / TS 22003 for management system Certification Bodies.			Couldn't reach consensus
IND 6	Part IV Glossary	Glossary	Additional required			Witness audit; witness assessor, unannounced audit	Opportunity Identified
LG 1	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Support the inclusion of food safety recalls into this section. We can then work with FSANZ to see if they will capture this information in te recall report a company has to do.	Opportunity Identified
LG 1	Part II	3.12	Desktop Assessment	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance on audit and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records.	Support	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 1	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	AusNZ LG member I am not sure the extra criteria need to be spelt out, this feels a little prescitptive, and unnecessary. Another LG member supports the inclusion of requirements for CB's confirming auditors site attendance to prevent fraud.	Opportunity Identified
LG 1	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Support	Opportunity Identified
LG 1	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Difficult to comemnt without knowing what is coming in the Delevpoment framework cinsultion.	Opportunity Identified
LG 1	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Support	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 1	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Support	Couldn't reach consensus
LG 1	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Question: Do you recieve a prelimnary report, with final report issued once Tech review has occured? If so, this allows for the interim report to not be goverend by these rules?	Agree
LG 1	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	Support	Couldn't reach consensus
LG 1	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Support	Opportunity Identified
LG 1	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.	Support	Couldn't reach consensus
LG 1	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	Support	Couldn't reach consensus
LG 1	Part II	6.32	Certificates	If the multi-site organisation is allowed to sell their product outside of the group or multi-site organisation, in all cases the member sites shall be transparent about the source and scope of certification, by providing customers with a copy of the certificate as issued above.	Certificate to include detailed description of the scope as it relates to the inclusion of Head Office or not.	Support	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 1	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	Wording does not amke sense "shall where possible" is it required or not? Suggest "This shall include, where applicable the elimination of the risk by design"	Opportunity Identified
LG 1	Part III FSMS	16.2	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.	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.	Support	Agree
LG 1	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Support plus Agree on the comments in 16.3 to add a clause with requirements for Allergen plan validation, specific requirements for verification for each production run should possibly also be considered, as this is where we see the most errors, in incorrect labels, human error etc.	Opportunity Identified
LG 1	Part III FSMS	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.	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 - add intended consumption as well?	Dont support, no legisaltionve requirements in AU/Nz on consumption and this would create confusions for products manufactured offshore with suppliers believing they need to include to comply with GFSI requirements	Couldn't reach consensus
LG 1	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	Support	Agree
LG 1	Part III FSMS	18	Printed material control	Procedures shall be established, implemented and maintained to manage packaging materials printed with product ingredient list(s), allergens, identification code and other critical information and prevent mis-printing.		What does critical information mean?	Couldn't reach consensus
LG 1	Part III FSMS	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.		"regulalry" tested is subjective - needs to define a time frame i.e .at laest annually	Couldn't reach consensus
LG 1	Part III FSMS	22	Serious incident management	An incident management procedure, including product withdrawal, shall be established, implemented and maintained. Withdrawal procedure shall be regularly tested for effectiveness.		"regulalry" tested is subjective - needs to define a time frame i.e .at laest annually	Couldn't reach consensus
LG 1	Part III FSMS	22.4	Serious incident management	An incident management procedure, including product recall, withdrawal, and retrofit shall be established, implemented and maintained. The recall procedure shall be regularly tested for effectiveness.		"regulalry" tested is subjective - needs to define a time frame i.e .at laest annually	Couldn't reach consensus
LG 1	Part III 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 should be recorded and verified.	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 be recorded and verified.	Support	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 1	Part III GMP	7.3	Training	Procedure shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	Procedures shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	Support	Agree
LG 1	Part III GMP	8.1.1	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.	Procedures for housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.	Support	Agree
LG 1	Part III GMP	8.1.2	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a feed safety risk.	Procedures for housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a feed safety risk.	Support	Agree
LG 1	Part III GMP	8.1.3	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks of cleaning shall be validated and verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a packaging safety risk.	Procedures for housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks of cleaning shall be validated and verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a packaging safety risk.	Support	Agree
LG 1	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Support	Couldn't reach consensus
LG 1	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	Support	Opportunity Identified
LG 1	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Dont support Suggest adding in "such as, but not liited to allergens"	Opportunity Identified
LG 1	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	Support	Opportunity Identified
LG 1	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Support	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 1	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	Support	Opportunity Identified
LG 1	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Support	Opportunity Identified
LG 1	Part IV Glossary	Glossary	Allergen	A substance causing an adverse reaction that is mediated by an immunological response.		'Food Allergen is on the brink of being finalised so a std recognised definition is best to be indicated in the Part 4 glossary. Propose that: the word food' next to allergen should be indicated as a minimum. The term allergen is too general in this context and captures a broader perspective (perhaps environmental) allergens. Prefer that the Codex definition for' food allergen' is applied once finalised. "Food allergen" means a food or ingredient [or substance or processing aid] including a food additive or processing aid usually containing a protein or protein derivative, that can elicit IgE-mediated or other specific immune-mediated reactions in susceptible individuals. OR "Food Allergen" means a food (including ingredients, food additives and processing aids) that can elicit IgE-mediated or other specific immune-mediated reactions in susceptible individuals, usually caused by a protein or protein derivative in the food.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 2	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Agree with the inclusion of "food safety". Without these, the scope would look too wide. Agree with the comments 2.	Opportunity Identified
LG 2	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	No objection to the comments, but the description shold be considered to avoid misinterpretation.	Opportunity Identified
LG 2	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree with the comments.	Opportunity Identified
LG 2	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Agree with the comments.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 2	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		The higher education requirement should be removed. Because of this requirement, many of the best auditors are unable to play an active role in food safety. In other words, the food safety sector is missing out on valuable auditor talent. The academic knowledge required for auditing can be fully acquired through industry experience, in-house training and self-development.	Opportunity Identified
LG 2	Part II	4.10.2	Initial Auditor Qualification	The Certification Programme Owner shall ensure that the witness audit(s) carried out as part of the certification body's initial auditor qualification follows the standard audit plan agreed with the certified organisation, including the use of ICT if applicable, as long as this does not compromise the effectiveness of the assessment. The Certification Programme Owner shall ensure that the witness assessor is present on site for parts of the audit carried out on site.	Suggest to introduce a distinction for 1st approval where the entire witness audit should be conducted on site (no permitted use of ICT).	Sould be organized in conjunction with 4.6.1.	Opportunity Identified
LG 2	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Agree with the comments.	Couldn't reach consensus
LG 2	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Agree with the comments.	Couldn't reach consensus
LG 2	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree with the comments.	Opportunity Identified
LG 2	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	Agree with the comments.	Couldn't reach consensus
LG 2	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Agree with the comments.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 2	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Agree with the comments.	Opportunity Identified
LG 2	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	The meaning and purpose of the content are unknown.	Couldn't reach consensus
LG 2	Part II	6.32	Certificates	If the multi-site organisation is allowed to sell their product outside of the group or multi-site organisation, in all cases the member sites shall be transparent about the source and scope of certification, by providing customers with a copy of the certificate as issued above.	Certificate to include detailed description of the scope as it relates to the inclusion of Head Office or not.	The meaning and purpose of the content are unknown.	Couldn't reach consensus
LG 2	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.		Opportunity Identified
LG 2	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	・Agree with the comments. ・No changes from the current version are necessary. The content should not be complicated. In addition, there should be a variety of ideas on the elements of food safety culture.	Opportunity Identified
LG 2	Part III FSMS	2.2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Hygienic Design Management System shall be provided.		・The definition of hygienic design management system should be added in the glossary.	Couldn't reach consensus
LG 2	Part III FSMS	3.2	Management review	The organisation's senior management shall review the verification of the Hygienic Design System at planned intervals, to ensure their continuing suitability, adequacy and effectiveness.		・It is better to describe not only the specified interval, but also in some cases of change such as HACCP 1.4. for a better balance between requirements.	Couldn't reach consensus
LG 2	Part III FSMS	5.2	Hygienic Design Management System	A Hygienic Design Management System shall be established, implemented, maintained and continuously improved.		・The definition of hygienic design management system should be added in the glossary.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 2	Part III FSMS	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.	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. *Suggest to update according to Codex: Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Food safety is based on science, so there is no need to add new requirements.	Couldn't reach consensus
LG 2	Part III FSMS	13.1.4	Purchasing and supplier performance	A procedure shall be established, implemented and maintained to ensure that the newly purchased building/equipment meets the hygienic design specification.		In operation, many food businesses will not be able to comply unless assurance by the supplier is allowed.	Couldn't reach consensus
LG 2	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	The additional red text is unnecessary because it is a matter of course in the operation of a management system.	Agree
LG 2	Part III FSMS	13.5	Purchasing and supplier performance	Specific provisions shall be in place for the procurement of feed from approved, certified sources.		• Approval and certification are not necessary if the requirements for feed are created, operated, and managed by the FBOs.	Couldn't reach consensus
LG 2	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	There is no need to eliminate the risk of allergen cross-contact by design. Allergens should be managed safely within existing designs and processes. With the exception of allergen-free foods, allergens are not evil.	Opportunity Identified
LG 2	Part III FSMS	16.2	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.	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.	Allergens use the term cross-contact, so I agree with the WG.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 2	Part III FSMS	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.	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 - add intended consumption as well?	・Since the contents on the label could be a barrier to business, it is not necessary to require the intended consumption on the label. ・Labelling is based on intended consumption. If you are unsure, a warning will be displayed individually	Couldn't reach consensus
LG 2	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	Identification and safeguarding are taken for granted, so there is no need to add new requirements.	Couldn't reach consensus
LG 2	Part III FSMS	26	Change Management	Change control shall be undertaken and documented to evaluate the impacts of any changes/ modifications on equipment/building hygienic design.	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.	Agree with WG comment	Agree
LG 2	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	Agree with WG comment	Agree
LG 2	Part III 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 should be recorded and verified.	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 be recorded and verified.	Commissioning should also be recorded	Couldn't reach consensus
LG 2	Part III GMP	7.3	Training	Procedure shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	Procedures shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	There is no need to provide food safety training to all employees and contractors. It is fine to limit it to those in supervisory positions.	Couldn't reach consensus
LG 2	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	No problem	Couldn't reach consensus
LG 2	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	No problem	Opportunity Identified
LG 2	Part III GMP	12.2	Waste management	A system shall be in place to control the disposal of trademarked material.		Requirements other than food safety should not be added. The focus is becoming blurred.	Couldn't reach consensus
LG 2	Part III GMP	4.4	Product contamination risk and segregation	The use of ingredients that contain substances that can be deleterious to certain classes of animals shall be appropriately managed.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 2	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Allergens are a hazard to specific consumers and are often described separately from general food safety hazards, so it would be a good idea to state that they are considered food safety hazards in the definition of the term in the glossary.	Opportunity Identified
LG 2	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	Agree with the comments.	Opportunity Identified
LG 2	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Agree with the comments.	Opportunity Identified
LG 2	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	Agree with the comments.	Opportunity Identified
LG 2	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	・ The red part in the comments is unnecessary. This is naturally taken into account when analyzing hazards. ・ There is no need to emphasize "allergen", so I agree with the deletion. I don't think obvious modifiers are particularly necessary. ・ If the red part was added in consideration of the fact that there are things that are difficult to manage, such as allergens, it is better to leave the word "allergen".	Opportunity Identified
LG 2	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	Agree with the comments.	Opportunity Identified
LG 2	Part III HACCP	1.5	Hygienic design process	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new buildings/equipment.	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade or improvements.	It is better to move it to PART 3 GMP	Couldn't reach consensus
LG 2	Part III HACCP	1.6	Hygienic design process	The hygienic design and suitability of buildings and equipment shall be evaluated throughout their life cycle from the design concept, through construction, purchasing and during use, until the end of their intended life.	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.	No need for "new and existing" in red.	Couldn't reach consensus
LG 2	Part III HACCP	1.9.1	Intended use	The intended use of the building/equipment shall be specified.		From 1.9.1 onwards, except for 1.17, the contents should be described in PART3 GMP.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 2	Part III HACCP	1.9.2	Intended use	The intended use of the building/equipment shall be described, as a specification for the intended purchase of new buildings and equipment.		The purpose of use may be different from the time of purchase (due to a change in the product or modification of equipment), and I thought that the purpose of use should be created, reviewed, or updated when introduced or changed.	Couldn't reach consensus
LG 3	Part I	1	Eligibility Criteria	• The Certification Programme is not governed or owned by a public or governmental entity,			Agree
LG 3	Part III FSMS	5.2	Hygienic Design Management System	A Hygienic Design Management System shall be established, implemented, maintained and continuously improved.		Management System seems too big here; recommend using "Hygienic Design Management" or "Hygienic Design Management Procedure" other than a management system.	Couldn't reach consensus
LG 3	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	In the validation plan, should mention to make the re-validation if any modification (e.g recipe, supplier etc)	Opportunity Identified
LG 3	Part III FSMS	2.2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Hygienic Design Management System shall be provided.		Management System seems too big here, recommend to use "Hygienic Design Management" or "Hygienic Design Management Procedurge" other than a management system.	Couldn't reach consensus
LG 3	Part III FSMS	3.2	Management review	The organisation's senior management shall review the verification of the Hygienic Design System at planned intervals, to ensure their continuing suitability, adequacy and effectiveness.		the Hygienic Design System is not in line with "hygienic Design management system" in 2.2. Recomment to use "Hygienic Design management" or "hygienic design management procedurge".	Couldn't reach consensus
LG 3	Part III GAP	6.2	Personnel health and hygiene	Suitable protective clothing shall be provided to minimise food safety risks.		Not only clothing, but also relevant equipments should be provided.	Couldn't reach consensus
LG 3	Part III GAP	6.3.1	Personnel health and hygiene	People known or suspected to be suffering from or to be a carrier of a disease or illness likely to be transmitted through produce shall not be allowed to enter any food handling area. Any person so affected shall immediately report illness or symptoms of illness to the management.		'injury' should be considered?	Couldn't reach consensus
LG 3	Part III GAP	18.4	Equipment	Medical instruments shall be clean and suitable for the intended use		should be also in rutine maintenance	Couldn't reach consensus
LG 3	Part III GAP	18.2	Equipment	Equipment shall be used and stored to minimise food safety risk.			Opportunity Identified
LG 3	Part III GMP	2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the production of safe products.		All grounds, road, drain, vegetation within the site shall be maintained to prevent contamination and enable the production of safe products.	Couldn't reach consensus
LG 3	Part III GMP	5	Employee facilities	Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.		Employee facilities including hand washing , change rooms and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.	Couldn't reach consensus
LG 3	Part III GMP	6.2	Personal hygiene, protective clothing and medical screening	Suitable protective clothing shall be provided to minimise food safety risks.		Suitable protective clothing and footwear shall be provided to minimise food safety risks.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
LG 3	Part III GMP	7	Training	Procedure shall be established, implemented and maintained to ensure that all employees are trained, and retrained as necessary to have an understanding in food safety, commensurate with their activity.		Procedure shall be established, implemented and maintained to ensure that all employees and temporary workers, are trained, and retrained as necessary to have an understanding in food safety, commensurate with their activity.	Agree
LG 3	Part III GMP	9	Rework	Rework shall be managed to minimise food safety risks and not to compromise traceability.		Rework shall be assessed and managed to minimise food safety risks and not to compromise traceability.	Couldn't reach consensus
LG 3	Part III 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.		A procedure shall be established, implemented and maintained for the collection, labeling, storage and disposal of waste material, including waste water and drainage.	Couldn't reach consensus
LG 3	Part III GMP	14	Reception of purchased materials	Appropriate procedures for the reception of purchased materials shall be established, implemented and maintained to assure that only materials that meet food safety requirements are accepted.		Appropriate procedures for the reception and inspection of purchased materials shall be established, implemented and maintained to assure that only materials that meet food safety requirements are accepted.	Couldn't reach consensus
LG 3	Part III GMP	17	Stock management	A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.		A procedure shall be established, implemented and maintained to ensure that purchased materials, packaging, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.	Couldn't reach consensus
LG 3	Part III GMP	18	Equipment	Equipment shall be suitable for the intended purpose. Equipment shall be designed, constructed, maintained, used and stored to minimise food safety risks.		Equipment shall be suitable for the intended purpose. Equipment shall be designed, constructed, installed, maintained, used and stored to minimise food safety risks.	Couldn't reach consensus
LG 3	Part III GMP	6.3	Personal hygiene, protective clothing and medical screening	A medical screening procedure shall be established, implemented and maintained to identify conditions impacting food safety and that any person affected shall immediately report illness or symptoms to management, subject to legal restrictions in the country of operation.			Couldn't reach consensus
LG 3	Part III GMP	6.4	Personal hygiene, protective clothing and medical screening	The requirements 6.1, 6.2, and 6.3 shall apply to employees, contractors and visitors commensurate to their impact on food safety.			Couldn't reach consensus
LG 3	Part III GMP	6.1	Personal hygiene, protective clothing and medical screening	Documented personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.			Couldn't reach consensus
LG 3	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	suggest to keep 'including allergens'	Opportunity Identified
LG 3	Part III HACCP	1.3	Hazard and Risk management system	The Hazard and Risk Management System shall be applicable to the site's scope of certification.		The Hazard and Risk Management System shall be applicable to the site's scope of certification. Possible exclusion should be justified.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	Yes. ISO 22003-1 if operating under ISO 17021 or ISO 22003-2 if ISO 17065	Agree
MAN 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	If there is only 1 CB and risk of monopoly, it is still possible to opt for other CPO.	Agree
MAN 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	ok	Opportunity Identified
MAN 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Agree	Opportunity Identified
MAN 1	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	Please alogn with ISO 22003	Couldn't reach consensus
MAN 1	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Keep "Corrective action planning". ISO definition : "action to eliminate the cause of a nonconformity and to prevent recurrence" No need to add the term "preventative"	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 1	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	**Not in favour of an appeal committte independent from GFSI. Keep an ad'hoc appeal committee selected within industry members only (no CPOs / CBs) and considering any conflict of interest and expertise required.**	Agree
MAN 1	Part II	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 / TS 22003 for management system Certification Bodies.		**ISO/TS 22003 doesn't exist anymore CB must comply with : - ISO 17021 and ISO 22003-1; or - ISO 17065 and ISO 22003-2**	Couldn't reach consensus
MAN 1	Part II	2.4	Relationship with Accreditation Bodies	The Certification Programme Owner shall establish regular exchanges and communication with their respective Accreditation Bodies. This shall include an agreement with the Accreditation Bodies to ensure accredited Certification Bodies comply with the requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003.		ISO/TS 22003 doesn't exist anymore CB must complyy with : - ISO 17021 and ISO 22003-1; or - ISO 17065 and ISO 22003-2	Couldn't reach consensus
MAN 1	Part II	2.10	Certification bodies list	The Certification Programme Owner shall ensure that a list of active Certification Bodies is publicly available without request. This list shall include the scope of activities of the Certification Bodies.		**In addition : Certiifed Organizations list (better placed below in the document, around data management) The Certification Programme Owner shall ensure that a list of cerrtified organizations is publicly available without request, including organizations whose certificate hase been suspended or withdrqwn in the past 12 months. This list shall include the scope of certification, validty dates of the certificate and the identification of the certifying body. Can also address the "GFSI recognition" and unannounced audits issues referred to below**	Couldn't reach consensus
MAN 1	Part II	3.1	Relationship with Certification Bodies	The Certification Programme Owner shall have contractual and enforceable arrangements with all Certification Bodies accredited to ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003 to operate their Certification Programme.		ISO/TS 22003 doesn't exist anymore CB must complyy with : - ISO 17021 and ISO 22003-1; or - ISO 17065 and ISO 22003-2	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 1	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	**This is an important point. There are too many recalls (including fatalities) involving certified organizations. Everytime this is happening we need to have clear conclusions on events, failures, liabilities.** **Today we just see the certificate be discreetly suspended/withdrawn.**	Opportunity Identified
MAN 1	Part II	3.12	Desktop Assessment	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance on audit and auditor records.	The Certification Programme Owner shall implement a risk-based programme of desktop assessments of Certification Body performance reviewing relevant audit files and auditor records.		Opportunity Identified
MAN 1	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	**Any CB suspended by CPO must be noticed on CPO's website, as GFSI does for CPOs.** **Agrree that there is a lack of transparency. But not in favour of public communication of CB's KPIs by the CPO as it is difficult to predict how it will be used by industry : most are still opting for the cheapest and most accomodating CB...** **We need to have public access to the history of suspensions not only the ongoing cases, and we need to know the reasons for suspension.**	Couldn't reach consensus

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
MAN 1	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		ISO/TS 22003 doesn't exist anymore CB must complyy with : - ISO 17021 and ISO 22003-1; or - ISO 17065 and ISO 22003-2	Couldn't reach consensus
MAN 1	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	Witness audit is a painful and expensive process. It must exist but difficult to define a minimum frequency. For example no need to witness a very experienced auditor as long as there is system to monitor performance from customer feedbacks, reports review, training evaluations.... We have seen cases of co-auditors making cross-witness audts -> beyoond the frequency of wiitness audits, you would have to specify other elements to make sure they are conducted in the right way	Opportunity Identified
MAN 1	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	For the **conutry(ies)** of sale of goods. Honestly this is barely achievable so i wouldn't add that. At best the auditor can evaluate whether the certified organization has process and capabilities for that	Agree
MAN 1	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	**The "every 3 year" rule should be made more flexible : for example do unannounced on Year 1, 4, 8, 11, 13 ior 1, 4, 6, 9, 13 nstead of 1, 4, 7, 10, 13 so that "on average" this is every 3 years.**	Opportunity Identified
MAN 1	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	**Barely applicable for FSSC 22000 certificates : there are (re)certification audits and surveillance audits. A certificate is issued after the (re)certiifcation audit valid 3 years, not always after the surveillance audits. It is generally preferred that surveillance auidts are unannounced, because in the recertification audit, you need to go into elements that may be difficul to audit if unannounced** **FSSC database doesn't describe the audits. IFS database does but is not publicly available**	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 1	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	**This is essntial.** **We have seen FSSC 2200 certificates that are not GFSI compliant, eg are based on full remote audit. On the FSSC 22000 portal they are listed the same way, not making it possible to differentiate GFSI / non-GFSI compliant.** **Better option would be that CPO are not allowed to provide a non-GFSI compliant option in their scheme as this is causing too much confusion** **Reminder : IFS portal is not publicly available**	Couldn't reach consensus
MAN 1	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	**We miss public transparency here : signiifcant food safety incidents involving any CB or CPO involved under GFSI recognition, withn the outcome of investigations on the incident and the CB process, any suspensions of CB by CPO or CPO by GFSI, action plans.** **We see such food safety incidents happening on a regular basis and then all of suddden the certificate is suspended/withdrawn and then we see nothing else happening and then other incident pops up somewhere else**	Opportunity Identified
MAN 1	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	**Make clear that this section is intended to address multi-site certification only, not the audit of head-office away from site in a single-site certification.** **The below requitrements do not always fit with ISO 22003.** **It is better to just refer to ISO 22003-1 and ISO 22003-2**	Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 1	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Recommend to retain Codex wording.	Agree
MAN 1	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	**Remove "where possible the elimination of the risk by design". Most of allergens are voluntarily present in or introduced into recipes. Are you aiming at the ban of dairy products for example ?**	Opportunity Identified
MAN 1	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	**Be careful** **Not applicable to the plan as a whole but some control measures yes, for example allergen clean process, system to reject wrong pack/label versus product.**	Opportunity Identified
MAN 1	Part III FSMS	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.	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 - add intended consumption as well?	NO. Keep "sale" or "put on the market"	Couldn't reach consensus
MAN 1	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	Not needed. Intention is met by the above requirements	Couldn't reach consensus
MAN 1	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	I think the above requitrement is enough	Couldn't reach consensus
MAN 1	Part III GAP	3.1	Location, design and layout	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning, disinfection and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	NO Disinfection may be necessary in some places/cases, but this is rather the exception. No change	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 1	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	NO. Farmers will not make a formal and documented risk assessment every time they use agricultural chemicals	Couldn't reach consensus
MAN 1	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	**Complex topic.** **Don't go that road.** **Stay on the "fit for purpose" concept**	Opportunity Identified
MAN 1	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	"Clutter" wouldn't be acceptable on a site so i suggest to remove that word. Generally speaking , this addition doesn"t bring anything. Maybe replace by "including the pest harborage in external environment" so it is clear it is about the inside of buldings only	Couldn't reach consensus
MAN 2	Part II	4.12	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that auditors are regularly trained and evaluated on their understanding of the Certification Programme.		This is very important; we often have experienced auditors that are not calibrated or not up to date when the FSSC standard has changed.	Opportunity Identified
MAN 2	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.	Customers (Costco) influence the frequency of unannounced audits with FSSC. Can this be eliminated? Costco requires ALL audits to be unannounced.	Opportunity Identified
MAN 3	Part III FSMS	4.4	Legislation	Procedures shall be established, implemented and maintained to ensure that buildings and equipment are legally compliant in the hygienic design requirements in the country of known implementation / sale.		Understand the requirement, but in my opinion the criteria should be one despite the country.	Couldn't reach consensus
MAN 3	Part III FSMS	16.2	Allergen management	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, implemented controls to reduce or eliminate that risk.	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.	If the term cross contact will be inserted, then the wording should be revise in the next clauses where allergens are mentioned	Couldn't reach consensus
MAN 3	Part III FSMS	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.		Possibly wording " assesed and investigated"	Couldn't reach consensus
MAN 3	Part III FSMS	4.3	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation.			Misunderstood
MAN 3	Part III HACCP	1.7	Risk assessment	A documented hygienic design risk assessment for food safety hazards on new and existing buildings/equipment shall be established, implemented and maintained. It shall include as a minimum the following considerations: intended use, food safety hazard identification, evaluation.		In some instances when a validation is not conducted certain risk may happen latter in the production /operations	Couldn't reach consensus
MAN 3	Part III HACCP	1.12	Hygienic design principles	Buildings and equipment shall be designed and constructed to avoid favourable growth conditions (for microorganisms, pests and their harbourage), appropriate to their intended use.		in the sentence "shall be designed and constructed with suitable material to avoid"...	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 4	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		Since IAF MD4 is used throughout this document, it could be valuable to link to it or inform those reading the benchmarking requirements where to find it.	Couldn't reach consensus
MAN 4	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agreed. Auditees feel comfortable with auditors that have industry experience and this is just as valuable as a higher education degree.	Opportunity Identified
MAN 4	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	This sounds like the regulations for the country of sale of goods is the most important, but the country where the business resides and operates is also important and auditors should be aware of these laws and regulations.	Couldn't reach consensus
MAN 4	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree. While unannounced audits can be valuable, this can be complex with primary production due to seasonality, weather, location, and security.	Opportunity Identified
MAN 4	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Agreed. Additional clarification should be made regarding he definition of a central function and if that approach can be implemented for non multi-site audits.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 4	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.	The rationale for risk should be publically explicitly stated and described with rationale. It is confusing to the industry when different CPOs have a different opinion of risk.	Couldn't reach consensus
MAN 4	Part II	6.29	Site audit sampling	The sampling programme shall be determined so that all members within the group or multi-site organisation are audited within a defined period, based on the risk of the commodity, for example 3-5 years.		What does "risk of the commodity" mean? How is this defined? If defined by CPOs then specific rationale backed by data should be publically available.	Couldn't reach consensus
MAN 4	Part II	6.30	Site audit sampling	A proportion of the sites selected to be audited by the Certification Body shall be unannounced. The unannounced audit sample size shall be determined by the risk of the commodity, but be at a minimum of 20% of the sample size.		What does "risk of the commodity" mean? How is this defined? If defined by CPOs then specific rationale backed by data should be publically available.	Couldn't reach consensus
MAN 4	Part III GAP	3.1	Location, design and layout	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning, disinfection and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.		Opportunity Identified
MAN 4	Part III GAP	4.1.2	Prevention of cross-contamination	Effective measures shall be taken during production, storage and transport to prevent cross-contamination of produce from agricultural inputs, cleaning agents, veterinary medicines or personnel who come directly or indirectly into contact with other sites, animals or produce.			Opportunity Identified
MAN 4	Part III GAP	4.1.3	Prevention of cross-contamination	Effective measures shall be taken during production, storage and transport to prevent cross-contamination of grain and pulses from agricultural inputs, cleaning and sanitizing agents, veterinary medicines or personnel who come directly or indirectly into contact with other sites, animals or grain and pulses.			Opportunity Identified
MAN 4	Part III GAP	4.4.1	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 microbial or chemical contamination			Opportunity Identified
MAN 4	Part III GAP	14.3	Input - Agricultural chemicals	Only agricultural chemicals which are authorised for the cultivation of the specific produce / grains and pulses shall be used. They shall be used according to the manufacturer's instructions, local legislations and for the intended purpose.			Opportunity Identified
MAN 4	Part III GAP	18.1	Equipment	Equipment and containers coming into contact with livestock and produce shall be made of materials that are non-toxic and designed and constructed to ensure that they can be cleaned, disinfected and maintained to avoid contamination.			Opportunity Identified
MAN 4	Part III GAP	18.1	Equipment	Equipment and containers coming into contact with livestock and grain and pulses shall be made of materials that are non-toxic and designed and constructed to ensure that they can be cleaned, disinfected and maintained to avoid contamination.			Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 4	Part III GAP	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Could there be 1 CB so the CPO can be eligible but note that the CPO cannot restrict to just 1 CB?	Misunderstood
MAN 4	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Why were specifics added here if it is all covered under pest infestation on site?	Couldn't reach consensus
MAN 4	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Agree that specific hazards should not be referenced.	Opportunity Identified
MAN 4	Part III HACCP	4.4	Legislation	Procedures shall be established, implemented and maintained to ensure that buildings and equipment are legally compliant in the hygienic design requirements in the country of known implementation / sale.		Should this be revised to requirements in countries of production and intended sale to align with 4.1 & 4.2?	Misunderstood
MAN 4	Part III HACCP	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	Does the red part need to be specified? Shouldn't all documents collected be maintained per document control procedures?	Misunderstood
MAN 4	Part III HACCP	19.2	Environmental monitoring	A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		Should 19.2 and 19.3 be combined as it sounds like they have the same meaning?	Misunderstood
MAN 4	Part III HACCP	19.3	Environmental monitoring	A risk-based approach shall be in place to define the environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.		Should 19.2 and 19.3 be combined as it sounds like they have the same meaning?	Misunderstood
MAN 4	Part III HACCP	1.2	Management responsibility	A clear organisational structure identifying the job functions and responsibilities of at least those employees whose activities affect Hygienic Design shall be established, implemented and maintained.			Opportunity Identified
MAN 4	Part III HACCP	4.3	Food safety legislation	Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation.			Misunderstood
MAN 4	Part III HACCP	5.2	Hygienic Design Management System	A Hygienic Design Management System shall be established, implemented, maintained and continuously improved.			Misunderstood
MAN 4	Part III HACCP	6.2	Hygienic Design Policy	A clear, concise and documented Hygienic Design policy statement shall be in place, as well as measurable objectives specifying the organisation's commitments to meet the food safety needs of its products			Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 4	Part III HACCP	13.1.3	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 regulatory requirements.			Misunderstood
MAN 4	Part III HACCP	13.3.2	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 Hygienic Design Management System.			Misunderstood
MAN 4	Part III HACCP	20.2	Internal audit	An internal audit procedure shall be established, implemented and maintained; it shall cover all elements of the Hygienic Design Management System.			Misunderstood
MAN 4	Part III HACCP	22	Serious incident management	An incident management procedure, including product withdrawal, shall be established, implemented and maintained. Withdrawal procedure shall be regularly tested for effectiveness.			Couldn't reach consensus
MAN 4	Part IV Glossary	Glossary	Central function	An identified central department (but not necessarily the headquarters of the organisation) which has the responsibility to plan, control and manage the organisation's food safety management system. Note: this could also be an organisation which is employed by or is a subsidiary of a larger organisation.		If central functions are only allowed for multi-site audits, should that requirement be specified in the glossary?	Agree
MAN 5	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	**Comment:** Food safety media attention" would range largely and would not necessitate an integrity of GFSI at risk. Adding such an example is confusing and would create confusion in the downstream interpretation by Scheme Owners and CBs. It is suggested that it be simplified to Food safety recalls and breakouts being the only occasions that should be named.	Opportunity Identified
MAN 5	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	**Comment:** We want to understand why a minimum of 20 is required, as it hinders MKC's pursuit of Multi-site certification.	Opportunity Identified

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Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 5	Part III FSMS	10.2	Specified requirements / Specifications	A review process of the specified requirements or specifications shall be in place.		Comment A regular review process of the specified requirements or specifications shall be in place.	Couldn't reach consensus
MAN 5	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.	Comment An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact contamination, implemented controls to reduce or eliminate that risk, a risk assessment of mislabeling and implemented controls to reduce or eliminate that risk and to ensure labelling of the food in compliance with the allergen labelling legislation in the country of intended sale occur.	Couldn't reach consensus
MAN 5	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Comment The allergen plan shall be validated at regular intervals	Opportunity Identified
MAN 5	Part III FSMS	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.	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 - add intended consumption as well?	**Comment:** Do not agree to include intended consumption, as regulations vary around the world.	Couldn't reach consensus
MAN 5	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	Comment Please refer to the comment under section 16.1: "…a risk assessment of mislabeling and implemented controls to reduce or eliminate that risk and to ensure labelling…" Add the requirement at 16.1 or at 18.3	Opportunity Identified
MAN 5	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Comment A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation and harbourage at the site.	Couldn't reach consensus
MAN 5	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	Comment The hazard and risk management system shall be reviewed at least annually and in case of any change that "could" impact food safety.	Opportunity Identified
MAN 6	Part III FSMS	10.3	Specified requirements / Specifications	The Food Safety Management System shall ensure that packaging used to impart or provide a functional effect on the safety of the food to be packed in this packaging, such as shelf life extension shall, where known, be effective within its own specified criteria.			Couldn't reach consensus
MAN 6	Part III HACCP	1.13	Hygienic design principles	Buildings and equipment shall be designed to prevent contamination, appropriate to their intended use.			Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 7	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Suggest changing the eligibility criteria for recognized programs so that GFSI can perform a continued recognition assessment of an existing GFSI recognized programs (in good standing) to the new requirements prior to implementation. These continued recognition assessments should cover both part II and part III with the goal of making the audit transition for participating facilities much more fluid. If this could occur the recognized CPOs would be able to implement the required changes, the CBs would be able to update their accreditation to the new program version, and the facilities would not need to go through duplicative audits because the initial audits would be benchmarked recognized to the updated version of the program. Facilities do not want to go through an audit that isn't to a GFSI benchmarked program because it won't have the same recognition.	Opportunity Identified
MAN 7	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.	The fully benchmarked CPOs have established systems and processes to implement changes and undergo annual assessments from GFSI. When the new version of the GFSI benchmarking requirements get rolled out the facilities do not want to participate in those initial audits because they will not have the GFSI recognition. It would be a much more fluid process for the facilities if this assessment could be covered under the continued recognition classification.	Opportunity Identified
MAN 7	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Steering Committee decision and communicating to the CPO, e.g. 2 weeks.	Couldn't reach consensus
MAN 7	Part I	6	Sanctioning		*Standalone escalation process to be described - flow diagram*	The Sanctioning process should include the following: •CPO - Non conformance response •GFSI - CAP review •GFSI - CAP feedback or acceptance •CPO - Final CAP response •GFSI - Assessment (communication to CPO at least 7 days prior to Non-Alignment communication) •GFSI - Non-Alignment Communication	Couldn't reach consensus

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Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 7	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		Sanction process should be transparent including the escalation process - what would initiate a sanction and the timelines involved? A definition is needed for non-alignment as its not in current glossary. The Sanctioning process should include the following: •CPO - Non conformance response •GFSI - CAP review •GFSI - CAP feedback or acceptance •CPO - Final CAP response •GFSI - Assessment (communication to CPO at least 7 days prior to Non-Alignment communication) •GFSI - Non-Alignment Communication	Couldn't reach consensus
MAN 8	Part III FSMS	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.	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 - add intended consumption as well?	"Intended consumption" is confusing and would need further clarification if added.	Couldn't reach consensus
MAN 8	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*		Opportunity Identified
MAN 8	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	The proposed additions only add ambiguity to the clause as those items should be controlled by other clauses, such as waste management.	Agree
MAN 8	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	Suggest: The Hazard and Risk Management System shall be reviewed at a defined frequency, and for of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	Opportunity Identified
MAN 8	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.	Clause 1.5 references "hygienic design". These terms should match.	Opportunity Identified
MAN 9	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.		Couldn't reach consensus

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Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
MAN 9	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	There is a worldwide trend for water circularity that we need to deep dive within the food industry, since it will be affecting. Understand what are the basic controls food industry must implement for water treatment to recirculate within processes (cleaning, sanitizing, or even as ingredient).	Opportunity Identified
MAN 9	Part III HACCP	1.5	Hygienic design process	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new buildings/equipment.	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade or improvements.	Upgrades and improvements do not include any new annexes done to existing buildings.	Couldn't reach consensus
MAN 9	Part III HACCP	1.6	Hygienic design process	The hygienic design and suitability of buildings and equipment shall be evaluated throughout their life cycle from the design concept, through construction, purchasing and during use, until the end of their intended life.	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.	Would be ideal to include the concepts of operational and maintenance costs & investments, since most of the times Sanitary Design is constraint by budget (Total Cost Ownership scheme)	Couldn't reach consensus
MAN 9	Part III HACCP	1.12	Hygienic design principles	Buildings and equipment shall be designed and constructed to avoid favourable growth conditions (for microorganisms, pests and their harbourage), appropriate to their intended use.		Include the concept of installation too, not only designed and constructed.	Couldn't reach consensus
NCPO 1	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*		Opportunity Identified
NCPO 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Suggest to 1. Cancel the requirement of the 10 latest issued certificates. 2. Modify the requirement to at least 1 certificate of the latest version of the Certification Programme for each Certification Body.	Opportunity Identified

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Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 1	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.		Misunderstood
NCPO 1	Part I	4	Methodology	Benchmark Leader	GFSI Benchmark Leader	Suggest to publish the list of GFSI Benchmark Leaders on the website	Couldn't reach consensus
NCPO 1	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.		Opportunity Identified
NCPO 1	Part III FSMS	9.2.1	Documentation requirements	All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the food if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.		If the shelf-life of the food is longer than legal requirements, the length of the storing period should be the shelf-life of the food.	Couldn't reach consensus
NCPO 1	Part III FSMS	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.	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 - add intended consumption as well?		Couldn't reach consensus

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Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 1	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.		Opportunity Identified
NCPO 1	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*		Opportunity Identified
NCPO 2	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Specification for 12 month requirement is a duplication of above.	Misunderstood
NCPO 2	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	As a general comment in relation to all of Part I, the clauses need numbering. A review process like this is very difficult without the abilty to cross reference interrlated areas. Also, not including all clauses in a consultation document requires reviewers to go back to source document and input detail into consultation document themselves which makes the process very difficult, unclear and inconsistent.	Opportunity Identified
NCPO 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates...) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	1. Agree with 12 months **operating as an accredited Food Safety Progamme prior to NEW GFSI applications** but do not agree with 12 months implementation of the version being used for the application (see comments in Row 10 below relation to how this links with versions). 2.The WG comment relates to no minimum implementation duration of a specific version in relation to continued recognition which we support. Not being able to update a standard and have continued recognition removes the ability for continous improvement and may have detrimental impacts on Food Safety Outcomes. The process for continued recogntion in the event of a version change is unclear and overall, the differences between new applications and continued recognition processes needs to be clarified. Generally the information is dispersed across different sections and not all in one place.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner has undertaken a self-assessment to validate that it is in alignment with the GFSI Benchmarking Requirements.		If the requirement for a 12 month implementation of the verison being submitted were to be kept (which we do not support), this requirement needs to be more clearly linked to the 12 month implementation of the version being submittted. If a CPO were to review their programme and make change, the cannot submit for 12 months.	Couldn't reach consensus
NCPO 2	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		There needs to be a very clear process for continued recogniton in the event a programme is reviewed and changes are made while it is GFSI recognised. This needs to be allowed to happen freely . The continued recognition process is loose and gives no confidence that a programme can be updated and improved and recognition maintained. It seems arbitrary and doesn't seem right to have a programme that is aiming to be updated to improve Food Safety Outcomes in the same process as a programme that has been suspended. **The comment above relates to the following clauses in Section 3 "Application Options" which as not been included in the consultation document.** Certification Programme Owners shall apply for continued recognition if the Certification Programme in the application is: • Recognised by GFSI against the current version of the GFSI Benchmarking Requirements but will be subjected to changes which could compromise its GFSI Recognition, such as changes to its	Opportunity Identified

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Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 2	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	The timeframe in relation to continued recognition when GFSI make a change should be 12 months. Also, there is no detail given in relation to the process (see comments in relation to Row 18 above). Is re-assessment the same as continued recognition? Is the process for assessment the same when GFSI updates their version as when a CPO updates a version? The whole area of re-assessments and continued recognion based on GFSI or CPO's updates is not clear. Also, information in relation to re-assessments and continued recognition is spread between elegibility, application and monitoring sections. It is not clear and needs an overhaul.	Agree
NCPO 2	Part I	5	Key procedural steps		Consider allowing re-application within less than 12-month period, where the CPO implemented the required actions Question on the number 10 as the required number of certificates (need tangible criteria for defining a threshold) Use more concise descriptions of the steps (bullet points, flowcharts or diagrams to visually represent the procedural steps) This can help readers quickly understand the process flow and the relationships between different steps Maintain a uniform structure for each procedural step. Start each section with a brief overview, followed by detailed steps Provide more context or examples where necessary. Explain why certain steps are important or what the implications are if they are not followed correctly. Include real-world examples or case studies to illustrate the application of these steps Include a section on common issues or FAQs that might arise during the procedural steps, along with solutions or best practices Highlight any critical compliance or legal requirements associated with each procedural step. This can prevent potential oversights that may have legal implication	Assume this is in relation to a suspension? Not sure that suspension should be included in continued recognition process. Information in relation to re-assessments,continued recognition and suspensions is spread between elegibility, application and monitoring sections. It is not clear and needs a thorough review. Would support re-entry within less than 12 months if required actions have been implemented but process needs to be clear.	Opportunity Identified

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Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 2	Part I	5	Key procedural steps	A => Application		**FOLLOWING CLAUSE NOT INCLUDED IN CONSULTATION DOCUMENT** *In the year prior to the publication of a new version of the GFSI Benchmarking Requirements, no new application will be accepted. A notice will be displayed on the GFSI website to indicate the starting date of this one-year period.* ***Comment below in relation to clause above.*** With the requirement to apply for re-assessment within 9 months of a new GFSI version being published why does there need to be a requirement for no applications 12 months prior to a new GFSI version. If a CPO understood they would need to re-submit soon after recognition the decision whether or not to apply would be up to them. Removing this one year time limit also allows GFSI to undertake a thorough review and not be pressured to complete within 12 months. It would be benefical for GFSI to provide publically available long term plans for review timeframes to enable forward planning for CPO's to align reviews to more efficiently update CP's with new Food Safety Outcomes	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 2	Part I	5	Key procedural steps	H => Annual Monitoring of continued alignment		Twice a year, the Benchmark Leader will remotely select at least five random audits, performed by various Certification Bodies and send the Certification Programme Owner a list of objective evidence and files related to these audits to verify alignment of Part II of the GFSI Benchmarking Requirements, including but not restricted to: • Certificate and report and / or auditor notes, • Contract with the Certification Body, • Examination file of the auditor, • Scope allowance of the auditor. **Following comment in relation to the clause above not included in the consultation document.** This seems like the role of the Accreditation Body. Additionally there is a requirement for CPO's to carry out reviews as well. Why does this need to be duplicated? Gap analysis Once a year, typically in conjunction with the first random record review, the Benchmark Leader will	Opportunity Identified
NCPO 2	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	It seems very insular and could be perceived as protectionism not to include other perspectives in Appeals Committee. CB's and CPO's are the eyes and ears of the programmes and are able to provide valuable input into decision making from a perspective different to industry. Actively excluding them from committees such as this creates an element of distrust.	Misunderstood
NCPO 2	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		These actions and decisions are very subjective. There is no examples of the types of issues that lead to various levels of action/sanction.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.	Support the option of only 1 CB. For smaller CP's the requirement to have more than one CB can create problems. For example, one CB may have only a small number of certified operators meaning meeting minimum annual audit numbers and maintaining auditor competency can be challenging.	Couldn't reach consensus
NCPO 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Agree needs further clarification.	Opportunity Identified
NCPO 2	Part I	1	Eligibility Criteria	These certificates shall be issued against the version of Certification Programme concerned by the application,		This clause is potentially impacting the ability for CPO's to make change and update the standard prior to and during the GFSI recognition process. Not making or delaying updates because a CPO wants to fulfill the GFSI requirement of 12 month implementation of the **version** being submitted impacts Food Safety Outcomes. Combine this with the up to 12 months recognition process means the CPO is not able to make changes to the standard for 2 years. This stifles the ability for change and continuous improvement at both the programme and producer level. Furthermore, if the submitted version is then recognised and the CPO wants to make changes, the continued recognition process is unclear. Also, for new applicants, working through the timing of applications in relation to the '2 -year hiatus', their own reviews and then anticipating GFSI reviews is very difficult and creates delays. This creates issues for suppliers wanting GFSI recognised standards as there is constant uncertainty as to when it will be available. This in turn is enabling supply without GFSI recognition as in some instances retailers have no choice but to accept product from a non GFSI recognised programme	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 2	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	Continued recogniton process is unclear and does not relate to re-assessment although both will address a change in CP verison. The only difference is one is instigated by CPO and one is instigated by updated GFSI version.	Opportunity Identified
NCPO 2	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	The intent of this clause is unclear. While we agree there needs to be actions to mitigate an actual food safety event, this clause seems more focussed on the publicity surrounding the event. Very broadly 'mitigating a situation' is the entire certification and accreditation programme. The intent of this clause needs to be clarified - is it about managing the situation or the publicity in the event of a food safety incident? It can be both but clarity is required. With respect to GFSI defined procedures for handling incidents, if this includes expectations in relation to how a CPO should act these requirements must be shared with CPO's.	Opportunity Identified
NCPO 2	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages	It is difficult to determine exactly what this comment means? If it is in relation to GFSI monitoring process of CPO's this should be on GFSI pages if it is felt there needs to be more transparency.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 2	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes: Acting with fortitude, Open to improvement, Culturally sensitive, Collaborative (not consulting), Professional, Morally courage, Organized	Examples are valid but will be very wordy with lots of examples. Consideration needs to be given to grouping somehow.	Opportunity Identified
NCPO 2	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	In general support the use of ICT. Would support introduction of a minimum frequency of witness assessment. Wording needs to accommodate audits that take less than one day. This could possibly be accommodated by specifying the need for onsite for key aspects of audit. See comments in 4.10.2 below in relation to ICT for witness assessments supporting witness assessments being completed using ICT so long as effectiveness maintained. Althougth it is unclear - if the WG comment also intends that assessments other than witness assessments cannot be completed using ICT we would not support this. Would we support onsite witness assessments? What would frequency be?	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
NCPO 2	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree with WG comments and reasons. Remove the emphasis on education, experience needs to be an alternative with the CPO determing what is relevant.	Opportunity Identified
NCPO 2	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Including all auditor requirements in one place would be clearer rather than splitting between Table One and this clause.	Opportunity Identified
NCPO 2	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Including all auditor requirements in one place would be clearer rather than splitting between Table One and this clause.	Opportunity Identified
NCPO 2	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Suggested wording does not add clarity. Is it meant to be 'relating' to ….? Talk to CB in relation to 'frequency' of witness audits. Also clarity of witness audit and peer review??	Opportunity Identified
NCPO 2	Part II	4.10.2	Initial Auditor Qualification	The Certification Programme Owner shall ensure that the witness audit(s) carried out as part of the certification body's initial auditor qualification follows the standard audit plan agreed with the certified organisation, including the use of ICT if applicable, as long as this does not compromise the effectiveness of the assessment. The Certification Programme Owner shall ensure that the witness assessor is present on site for parts of the audit carried out on site.	Suggest to introduce a distinction for 1st approval where the entire witness audit should be conducted on site (no permitted use of ICT).	Would not support the proposed change. Would want to see the retention of the abilty to use ICT ensuring there is no compromise to effectiveness of the assessment. Retaining the need for part of the witness assesement to be completed on-site provides the ability to focus on certain areas if necessary.	Opportunity Identified
NCPO 2	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	Would support this.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 2	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Although not related to this clause this requirement supports the need to have the option of only one CB auditing the Programme (in Eligibility Criteria Section). For smaller CPO's having to split audits across CB's may make this clause difficult to fultill for each auditor as they may not have enough registered operators and no alternative GFSI recognised schemes to enact 4.15 below.	Couldn't reach consensus
NCPO 2	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Additional audit requirements upt to CPO to define to ensure consistency of administration of programme across across CB's.	Couldn't reach consensus
NCPO 2	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.	Would support this proposal. There are a number of issues in relation to completing entirely uannounced audits. The seasonal nature of primary industries and rural locations with significant travel distances are obvious issues. Unannounced audits are particluarly hard for smaller operators who may have very small teams - to lose a team member for a day or more can have a significant impact on operations, particularly at critical times of the year. Health and safety also needs to be taken into consideration.	Opportunity Identified
NCPO 2	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	Would support the need to include on audit reports as it may inform subsequent audits.	Couldn't reach consensus
NCPO 2	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Assuming the contracted organisation is the CB, we would question the ownership of the audit report remains with the CB. If the contacted organisation is the operator/producer then we support this clause.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 2	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Would support an indication on cerificate that is issued against a GFSI recognised programme.	Couldn't reach consensus
NCPO 2	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	Agree	Couldn't reach consensus
NCPO 2	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Support the concept of clarity of requirements applicable to central function versus at producer level. The intent of the second point is unclear. Clause 6.7 specifies the requirement for central function to be audited annually. Or is the intention that all sites have some aspects audited annually - if that were the case we would not support this. Each site is internally audited annually and the central function and a sample of sites are audited annually. This approach is not looking at the system in its entirety.	Opportunity Identified
NCPO 2	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	Would support CPO's specifying a portion of audits can be completed prior to central function. Due to seasonality in primary industry and dependent on variety of crops included this is necessary at times.	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NCPO 2	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	Agree add clarity around HO/central function to avoid confusion. Also, if a certification were issued that included HO where the audit had not included all standard requirements there would need to be parameters around this?	Agree
NCPO 2	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	It is a commercial decision for an operator to decide how they want to structure their certificaiton and whether they want multi-site certification. Would suggest no number. Multi-site certification is about central management not the number of sites.	Opportunity Identified
NCPO 2	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Leave as "Specifications shall be established..." given it covers inputs and services e.g. pest control services. Specifications may be established for this but can they be linked back to scientific principles?	Opportunity Identified
NCPO 2	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	Changes to an external reference document including Codex, cannot instantly be incorporated into a Standard. There needs to a process/transition for change management for external references.	Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
NPO 1	Part III FSMS	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.	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. *Suggest to update according to Codex: Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	*Getting data from suppliers can be rough, please see comment in 18,2*	Couldn't reach consensus
NPO 1	Part III FSMS	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.		In too many cases, specifications are still lacking information the following steps in the food chain need to make comprehensive decisions and management of their food safety. For example, - no mention that the product satisfy the regulations for a defined market/territory, - no data on the hazards and the limits achieved (size of mesh, size of controlled metal particles, amount of allergens and/or expected traces,...). It would help companies to have this kind of data, some making it mandatory for certified suppliers would be nice. In addiion, it is still sometimes difficult for companies to get the specifications from some of their suppliers, even certified ones. A global system able to get complaints about this, giving auditors the list of complaints concerning the company they will audit, may help to ensure that the data is well transmitted.	Opportunity Identified
NPO 1	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	see above for a potential other new clause	Misunderstood
NPO 1	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	There is an alternative for fish in many regulations, to use clean water instead of potable.	Opportunity Identified
REG 1	Part II	1.3	Ownership	The Certification Programme Owner shall neither have conformity assessment nor certification activities for the Certification Programme. In particular, the Certification Programme shall not be developed, managed or owned by a Certification Body or group of Certification Bodies.		we propouse the next redaction to end seccion: "for avoid interest conflicts"	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
REG 1	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	This requisite is the same to 13.2.2	Misunderstood
REG 1	Part III FSMS	13.2.2	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 feed still conforms to the specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded.		This requisite is the same to 13.2.1	Misunderstood
REG 1	Part III FSMS	13.2.3	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 packaging still conforms to the specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded.		This requisite is the same to 13.2.4	Misunderstood
REG 1	Part III FSMS	13.2.4	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 buildings/equipment 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.		This requisite is the same to 13.2.3	Misunderstood
REG 1	Part III FSMS	14.1.2	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 feed (minimum one step forward).		This requisite is the same to 14.1.1	Misunderstood
REG 1	Part III FSMS	14.5	Traceability	Specific policies shall be in place for the procurement of approved veterinary medicines.		Specific policies shall be in place for the procurement of approved veterinary medicines. This policies has to be consistent to OIE standards, guidelines and resolutions on Antimicrobial resistance and the Codex Alimentarius	Couldn't reach consensus
REG 1	Part III GAP	11.2.1	Water quality	Procedures shall be in place to identify the sources of water used on the farm (municipality, reused irrigation water, well, open canal, reservoir, rivers, lakes, farm ponds etc.) and to assess its suitability for the intended use		Procedures shall be in place to identify the sources of water used on the farm (municipality, reused irrigation water, well, open canal, reservoir, rivers, lakes, farm ponds etc.) and to assess its suitability for the intended use, the above bassen on risks of the farm.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
REG 1	Part III GMP	4.3	Product contamination risk and segregation	Procedures and control measures shall be in place to manage the use of feed medication where applicable.		Procedures and control measures shall be in place to manage the use of feed medication where applicable.This procedures has to be agreement to technical sheet the farmaceutical product.	Couldn't reach consensus
REG 1	Part III HACCP	1.8	Risk assessment	The hygienic design risk assessment shall be reviewed when any change to the building/equipment/product/process is made or other hazards arise, or at a minimum frequency defined by applicable laws and regulations.		The hygienic design risk assessment shall be reviewed in planned intervals and when any change to the building/equipment/product/process is made or other hazards arise, or at a minimum frequency defined by applicable laws and regulations.	Couldn't reach consensus
REG 1	Part III HACCP	1.9.2	Intended use	The intended use of the building/equipment shall be described, as a specification for the intended purchase of new buildings and equipment.		The intended use of the building/equipment shall be described, as a specification for the intended purchase or construction of new buildings and equipment.	Agree
REG 1	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.	The construccion material has to the Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Couldn't reach consensus
REG 2	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	An alternative process to this application will be needed for Government Entities.	Misunderstood
REG 2	Part I	1	Eligibility Criteria	• The Certification Programme is not governed or owned by a public or governmental entity,		With the phase out of TE, government entities would need this requirement removed.	Agree
REG 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	As a government based program there would not be two certification bodies.	Couldn't reach consensus
REG 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	(ORGANISATION) is in support of the proposed suggestion to apply no restriction on minimum duration of operation where ther application is for a new version of a currently recognised programme, provided that there is sufficient records and material available to conduct GFSI assessments as part of the GFSI Benchmarking process.	Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
REG 2	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Agree with the need to have further definition on what is considered a signficant change. Updates to the program if occuring on a regular basis may need to be considered as part of this process.	Agree
REG 2	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		Sanctioning by GFSI is something a government organization can not agree to. Alternatives to formal sanctioning would need to be explored.	Misunderstood
REG 2	Part I	1	Eligibility Criteria	• The Accreditation Bodies granting accreditation to the scope of the Certification Programme shall be members of the International Accreditation Forum (IAF) and shall be signatories to the Multilateral Recognition Arrangement (MLA),			Couldn't reach consensus
REG 2	Part I	4	Methodology	How much time does the GFSI Benchmarking Process take to complete	**Full benchmarking** This option may be considered in the following circumstances: the certification programme is seeking GFSI recognition, may be a new version of a currently recognised certification programme not previously undergone benchmarking by GFSI or has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), or been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), or been previously recognised by GFSI but had their recognition withdrawn.		Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
REG 2	Part II	1.3	Ownership	The Certification Programme Owner shall neither have conformity assessment nor certification activities for the Certification Programme. In particular, the Certification Programme shall not be developed, managed or owned by a Certification Body or group of Certification Bodies.		Comment for 1.3, 3.1 - 3.9. For Government based programs there needs to be allowances for the CPO and the CB functions to exist within the same government agency with proper firewalls to separate functions. For example, government systems with separation of functions designated by the organizational structure and quality management system.	Couldn't reach consensus
REG 2	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	USDA supports this proposal to an alternative for experience to be a substitution for higher education. USDA AMS Auditor Candidate Critera requires applicants to possess 3-Years Post-High School experience and/or education. This can be qualified by relevant education, relevant work experience, or a combination of education and work experience as defined in the auditor candidate critiera.	Opportunity Identified
REG 2	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	The regulations for the country of sale of goods may not always be known at the time of the audit by the auditor.	Agree
REG 2	Part II	5.19	Audit Reporting	The Certification Programme Owner shall ensure that necessary agreements are in place with the audited organisations and the Certification Bodies so that the audit records are available on request to the Certification Programme Owner and to GFSI.		This requirement would be subject to government regulations for confidentiality.	Misunderstood
REG 2	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.	The preference would be for individual program owner to determine what is considered high- risk.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
REG 2	Part II	2.4	Relationship with Accreditation Bodies	The Certification Programme Owner shall establish regular exchanges and communication with their respective Accreditation Bodies. This shall include an agreement with the Accreditation Bodies to ensure accredited Certification Bodies comply with the requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003.			Couldn't reach consensus
REG 2	Part II	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. NB: All the IAF MLA signatories demonstrate conformance with ISO / IEC 17011.			Misunderstood
REG 2	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*		Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
REG 2	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.		Opportunity Identified
REG 2	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	If this proposed new language is added, include the full sentence from Codex "Where microbiological, chemical or physical specifications are used in any food control system, such specifications should be based on sound scientific principles".	Opportunity Identified
REG 2	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	All documentation is covered under 9.1 and 9.2.1 requirements. It is not necessary to repeat the requirement here. Propose removing the suggested change.	Agree
REG 2	Part III FSMS	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.	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 - add intended consumption as well?	Suggest not adding intended consumption - as it would be difficult to know how or where the product would be consummed in a global market. The requirement speaks to applicable food safety legislation. Would this mean the country where it is consumed you would have to label the product per that country's laws? How would you comply if you don't know where it will be consumed?	Couldn’t reach consensus
REG 2	Part III FSMS	16.1	Key elements of discussions from the group + LINK to the Moms document	An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross contamination, 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.	An allergen management plan shall be established, implemented and maintained. This shall include where possible the elimination of the risk by design, a risk assessment of allergen cross contact ~~contamination~~, 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.		Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
REG 2	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.		Opportunity Identified
REG 2	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.		Opportunity Identified
REG 2	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*		Opportunity Identified
REG 2	Part III GAP	3.1	Location, design and layout	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning, disinfection and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	By adding the word disinfection for produce farming operations is much too restrictive for an open, outdoor facility and environment. This would be extremely difficult for growers to disinfect facilities and equipment which is often exposed to the environment or kept outdoors. Suggest not adding the word disinfection.	Agree
REG 2	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*		Opportunity Identified
RET 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Aligned with a minimum 2 CB's not 1 CB.	Agree
RET 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Aligned with the comments and the suggested clarity which is required.	Opportunity Identified
RET 1	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	Aligned to the request to ensure faster resolution is obtained to investigation or suspension decisions.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
RET 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*		Opportunity Identified
RET 1	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Essential change to requirements to ensure significant food safety incidents are reported and there is inceased transparency with issues linked to certified sites.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
RET 1	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	Agree with including the reference to ISO 19011.	Opportunity Identified
RET 1	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Only two years experience in food is insufficient to enable a successful audit. Observing much weaker audits from the CPO standards which allow this as minimum criteria. Personnel working in quality assurance are not always responsible for food safety, agree with this removal from the BMR's.	Opportunity Identified
RET 1	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Concern that multiple HACCP/Food Safety training courses are offered with no minimum content standards set. Providing a certificate is obtained this can satisfy the current requirements which is insufficient to demonstrate competency.	Opportunity Identified
RET 1	Part II	4.10.2	Initial Auditor Qualification	The Certification Programme Owner shall ensure that the witness audit(s) carried out as part of the certification body's initial auditor qualification follows the standard audit plan agreed with the certified organisation, including the use of ICT if applicable, as long as this does not compromise the effectiveness of the assessment. The Certification Programme Owner shall ensure that the witness assessor is present on site for parts of the audit carried out on site.	Suggest to introduce a distinction for 1st approval where the entire witness audit should be conducted on site (no permitted use of ICT).	Agree with the entire witness audit for initial qualification to be in person to enable an adequate assessment of soft skills to be completed.	Opportunity Identified
RET 1	Part II	4.12	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that auditors are regularly trained and evaluated on their understanding of the Certification Programme.		Auditors should undergo refresher training and the effectiveness of the training assessed when the CPO audit programs are revised.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
RET 1	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Suggest remaining the same - products produced at a site may not always be sold in the intended country, could also be donated in the country of manufacture.	Agree
RET 1	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree with the consensus with removing unannouced audits for primary production scopes, often notice is being provided ahead by some of the CPO's (24/48hrs) or audits are being completed as a desk top audit without any operational activities. Additionally failure to complete an unannounced audit at a primary site for multiple reasons is routinely adding extra burden to the auditor availability and additional costs to the site.	Opportunity Identified
RET 1	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	Having access to certs that are current in one location would be very beneficial for stakeholders and end users of the certificates - preventing fraud and leading to greater transparency.	Couldn't reach consensus
RET 1	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Agree with the need for a database which lists all current certificates, not all CPO's have public assess to certificates making it difficult to determine whether certificates are authentic or not.	Couldn't reach consensus
RET 1	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Fully agree with these comments - central function/head office audits are being completed at businesses with multi site locations which do not fit into the allowed criteria. Increased clarity and closer scrutiny of these practices is much required.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
RET 1	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	I think this needs to be reworded as it appears to be contradictory - central function "shall" be audited before the sample sites meaning it must be but then a small number of sample sites may be audited - this appears to conflict with the requirements.	Couldn't reach consensus
RET 1	Part II	6.17	Internal audit	Internal auditors shall meet similar or comparable requirements to those for external auditors, as set out within each Certification Programme Owner's rules. This shall include, at a minimum, requirements related to internal auditor education, training, work experience or other qualifications. Their qualifications shall be assessed annually by the Certification Body. Certification Programme Owners may require the organisation's internal auditors to successfully complete the Certification Programme Owners specific auditor training.		Where internal audits form a businesses verification step of the sites related to the central function it would be essential that the internal auditors maintain the same level of competency as a GFSI auditor given the reliance on these auditors.	Couldn't reach consensus
RET 1	Part II	6.19	Internal audit	Internal auditors shall be assigned by the central function to sites to ensure impartiality.		Would suggest include "independent" to reinforce the impartiality.	Agree
RET 1	Part II	6.27	Management of non-conformities	If the central function, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including the central function and all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.	Define "critical Certification Programme requirements" or suggest to replace by "leading to major non conformities". Some members suggested " fundamental certification programme requirements".	I believe where there is a ciritical failure this would suggest a regulatory infringement or actual evidence of a significant food risk.	Couldn't reach consensus
RET 1	Part II	6.29	Site audit sampling	The sampling programme shall be determined so that all members within the group or multi-site organisation are audited within a defined period, based on the risk of the commodity, for example 3-5 years.		This cycle could enable some sites to only have a 3rd party audit every 5 years? Over reliance on the effectiveness of the businesses own internal audit process is concerning.	Opportunity Identified
RET 1	Part II	6.30	Site audit sampling	A proportion of the sites selected to be audited by the Certification Body shall be unannounced. The unannounced audit sample size shall be determined by the risk of the commodity, but be at a minimum of 20% of the sample size.		The overall value versus the ongoing issues of conducting unannounced audits for the primary categories needs discussion. Multiple of examples of audits progressing with no actual activities being carried out due to harvesting issues.	Opportunity Identified
RET 1	Part II	6.32	Certificates	If the multi-site organisation is allowed to sell their product outside of the group or multi-site organisation, in all cases the member sites shall be transparent about the source and scope of certification, by providing customers with a copy of the certificate as issued above.	Certificate to include detailed description of the scope as it relates to the inclusion of Head Office or not.	Aligned with this requirement, GFSI central repository for certifcates would help - almost impossible to determine which businesses currently have central function audits - lack of visbility to this.	Couldn't reach consensus
RET 1	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	Alignment necessary on the number of sites - need to consider the requirement for internal audits and resourcing expectations.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
RET 1	Part II	6.36	Site audit sampling	The sample size shall meet the requirements defined in the table 2.		Would be beneifical to include clarity on the sampling program per risk profile. also consider sample size - potential 32 sample audits over 1000 locations does not seem to be representative of the total business.	Couldn't reach consensus
RET 1	Part II	1.21	Data Management	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: •Number of qualified auditors; •Number of valid certificates; •Number of issued certificates within a given period; •Number of suspended certificates; •Number of withdrawn certificates.			Couldn't reach consensus
RET 1	Part II	3.9	Relationship with Certification Bodies	The Certification Programme Owner shall publish guidance / requirements to Certification Bodies on transition arrangements when a new version of the Certification Programme is issued. The Certification Programme Owner guidance / requirements may encompass elements such as the following: - terms and conditions of transition period between previous and new versions; - defined timeline for transition; - comparative information between previous and new versions; - timeline in which Certification Bodies are required to cascade information to all auditors and certified organisations.			Opportunity Identified
RET 1	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*		Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
RET 1	Part II	4.4	Certification Body Personnel Competence	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: - Name and address 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).			Couldn't reach consensus
RET 1	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.		Opportunity Identified
RET 1	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension		Opportunity Identified
RET 1	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*		Couldn't reach consensus
RET 1	Part II	5.30	Management of Certification	The Certification Programme Owner shall ensure that Certification Bodies notify them of any withdrawal or suspension of certification of an organisation.			Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
RET 1	Part II	6.6	General requirements	The central function shall be included in the scope of the certification.			Couldn't reach consensus
RET 1	Part II	6.9	Central Function	The central function shall have authoritative control of the Food Safety Management System of all sites within the certification and shall maintain traceability and issue, maintain and retain all relevant documents relating to the sites within the programme.			Couldn't reach consensus
RET 1	Part II	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, the central function and the management system at least annually.			Agree
RET 1	Part II	6.16	Internal audit	Clear requirements for internal auditors and technical reviewers shall be defined, documented and reviewed by the Certification Body.	Clear requirements for internal auditors and ~~technical~~ reviewers shall be defined, documented and reviewed by the Certification Body.		Couldn't reach consensus
RET 1	Part II	6.18	Internal audit	Internal auditors shall be regularly evaluated, calibrated and monitored.			Couldn't reach consensus
RET 1	Part II	6.20	Internal audit	Internal audit reports shall be reviewed by the central function and include addressing the non-conformities resulting from the internal audit.			Opportunity Identified
RET 1	Part II	6.21	Site audit sampling	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. 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.	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. 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		Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
RET 1	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1		Couldn't reach consensus
RET 1	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1		Opportunity Identified
RET 1	Part II	6.24	Site audit sampling	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.	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 MD1		Opportunity Identified
RET 1	Part II	6.25	Management of non-conformities	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.	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		Opportunity Identified
RET 1	Part II	6.26	Management of non-conformities	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.	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 MD1		Opportunity Identified

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Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
RET 1	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.		Couldn't reach consensus
RET 1	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*		Couldn't reach consensus
RET 1	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Just mentioning FS Culture is not sufficient - there needs to be an understanding of what it means and leadership role in driving culture to have any value within this clause. Many senior leaders do not understand their influence on food safety behaviours and defer to the technical person rather than take accountability and lead.	Opportunity Identified
RET 1	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	Would need to include reference to impact on food safety into the clause requirements - most frequent issue being allergen mislabelling.	Couldn't reach consensus
RET 1	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.	Need to consider legal constraints in certain countries in terms of informaition on employee health standards.	Opportunity Identified
RET 1	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.		Opportunity Identified
SP 1	Part II	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.	The word 'sanitary' should not be included - too prescriptive.	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
SP 1	Part III FSMS	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.	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. *Suggest to update according to Codex: Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Agree with adding the Codex content but add all the Codex content to make it clearly understood.	Agree
SP 1	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	Is this really a change to the element content	Agree
SP 1	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Agree	Agree
SP 1	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	Agree	Agree
SP 1	Part III FSMS	26	Change Management	Change control shall be undertaken and documented to evaluate the impacts of any changes/ modifications on equipment/building hygienic design.	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.	Agree	Agree
SP 1	Part III FSMS	27	Change Management		Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.	Agree	Agree

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Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
SP 1	Part III GMP	3	Site design, construction, layout and flow of operations	The site, both the exterior and the interior, shall be designed, constructed and maintained to minimise food safety risks. The layout and flow of operations shall be suitable for the intended purpose and designed to minimise food safety risks.	The facility, both the exterior and the interior, shall be designed, constructed, and maintained to minimise food safety risks. The layout and flow of operations within the facility shall be suitable for the intended purpose and designed to minimise food safety risks. （It is understood that the term 'site' refers to all parts within the premises in the context of food safety regulations. However, there may be cases where it is clearer to distinguish between 'site' and 'facility' depending on the context, so it is worth considering.）	Question: Would it be acceptable to flexibly adjust the scope of what 'site' refers to according to the context?	Couldn't reach consensus
SP 1	Part III 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 should be recorded and verified.	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 be recorded and verified.	Agree	Agree
SP 1	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Agree	Couldn't reach consensus
SP 1	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Surely the existing content covers the areas suggested. It could be interpreted that only these areas are to be included.	Agree
SP 2	Part III FSMS	8.2	Food fraud	A documented food fraud plan shall be in place specifying the measures implemented to mitigate the public health risks from the identified food fraud vulnerabilities.		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.	Agree
SP 2	Part III FSMS	8.3	Food fraud	This food fraud mitigation plan shall be supported by the organisation's Food Safety Management System.		Sections 8.2 and 8.3 reference two plans: 'food fraud plan' in 8.2 and 'food fraud mitigation plan' in 8.3. When reflecting these in the BMR, please include a note defining both terms.	Opportunity Identified
SP 2	Part III FSMS	10.2	Specified requirements / Specifications	A review process of the specified requirements or specifications shall be in place.		A review process of the specified requirements or specifications shall be in place to ensure that no food safety hazards arise from failing to meet these requirements or specifications. Revisions shall be made as necessary, and the results shall be reviewed and retained.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
SP 2	Part III FSMS	13.4	Purchasing and supplier performance	Specific procedures shall be in place for the procurement of animals, fish and seafood which are subject to control of prohibited substances (e.g. pharmaceuticals, veterinary medicines, heavy metals and pesticides).		Specific procedures shall be in place for the procurement of animals, fish and seafood which are subject to control of prohibited substances (e.g. pharmaceuticals, veterinary medicines, heavy metals and pesticides). These procedures shall define the animals, fish, and seafood subject to control due to the potential impact of these substances, and ensure that specific procedures are established and followed for their procurement.	Couldn't reach consensus
SP 2	Part III FSMS	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.		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. This information must be provided in a reasonable and reliable manner.	Couldn't reach consensus
SP 2	Part III FSMS	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.		The agent / broker shall ensure that their suppliers have established, implemented, and maintained a food safety threat assessment procedure to identify potential threats and determine the prioritization of food defence measures.	Couldn't reach consensus
SP 2	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.		The site shall be clearly demarcated using physical means, and maintained to enable the reception, storage, production, and distribution of safe food and to prevent its contamination.	Agree
SP 2	Part III GMP	4.2	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to maintain product integrity and regulatory compliance regarding the disposal, resale, donation, restocking or reuse of product being salvaged or reclaimed.		Procedures shall be established, implemented and maintained to maintain product integrity and regulatory compliance regarding the disposal, resale, donation, restocking or reuse of product being salvaged or reclaimed. Ensure that operations are conducted properly and records of their completion are maintained.	Couldn't reach consensus
SP 2	Part III GMP	4.7	Product contamination risk and segregation	Procedures shall be established, implemented and maintained to ensure printed materials are not mixed or intermingled with other materials including in-process and reworked materials.		Procedures shall be established, implemented, and maintained to ensure that printed materials do not mix or become intermingled with other materials, including materials in-process and reworked materials.	Couldn't reach consensus
SP 2	Part III GMP	9	Rework	Rework shall be managed to minimise food safety risks and not to compromise traceability.		Rework shall be managed to minimise food safety risks and not to compromise traceability. Reworking includes tasks to correct nonconformities.	Opportunity Identified
SP 2	Part III GMP	12.2	Waste management	A system shall be in place to control the disposal of trademarked material.		A system shall be established and implemented to control the disposal of trademarked material to ensure it does not re-enter the supply chain.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
SP 2	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.		A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence or failure of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law. A primary focus shall be on mitigating risks to ensure safety.	Opportunity Identified
SP 3	Part III GAP	3.1	Location, design and layout	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning, disinfection and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.		Opportunity Identified
SP 3	Part III GAP	3.3	Location, design and layout	The site facility shall be fenced and the entry points controlled by lockable gates.			Opportunity Identified
SP 3	Part III GMP	2	Local environment	All grounds within the site shall be maintained to prevent contamination and enable the production of safe products.			Couldn't reach consensus
SP 3	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.		Couldn't reach consensus
TA 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	No additional references.	Agree
TA 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Maintain 2 CBs as a minimum	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Delete examples as they may or may not impact the quality of the delivery of the GFSI recognized certification program and could be interpreted as the requirement itself. Support wording "a situation potentially impacting the quality of the delivery of the GFSI recognised certification programme". Rationale: A change of ownership or changes to key personnel do not automatically mean that the programme has stopped operating effectively. The changes may in fact lead to improved delivery of the programme.	Opportunity Identified
TA 1	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Agree. The process for new and existing CPOs should be different.	Opportunity Identified
TA 1	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*		Agree
TA 1	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*		Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	Agree	Agree
TA 1	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.			Opportunity Identified
TA 1	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.		Couldn't reach consensus
TA 1	Part I	5	Key procedural steps		Consider allowing re-application within less than 12-month period, where the CPO implemented the required actions Question on the number 10 as the required number of certificates (need tangible criteria for defining a threshold) Use more concise descriptions of the steps (bullet points, flowcharts or diagrams to visually represent the procedural steps) This can help readers quickly understand the process flow and the relationships between different steps Maintain a uniform structure for each procedural step. Start each section with a brief overview, followed by detailed steps Provide more context or examples where necessary. Explain why certain steps are important or what the implications are if they are not followed correctly. Include real-world examples or case studies to illustrate the application of these steps Include a section on common issues or FAQs that might arise during the procedural steps, along with solutions or best practices Highlight any critical compliance or legal requirements associated with each procedural step. This can prevent potential oversights that may have legal implication	Agree with the first point. Suggest remove the 10 certificate requirement.	Opportunity Identified

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Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	Suggest replace "Preventative" with "Preventive" (to align with "Corrective")	Couldn't reach consensus
TA 1	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Agree	Agree
TA 1	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Agree with first point. However, there should be at least one member (preferably more) of the Appeals Committee who has expertise in practical application of the GFSI BMRs	Agree
TA 1	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Reword: "food safety breakout" to read "food safety outbreak". A serious food safety situation is an outbreak. When reporting to GFSI is required, additional requirements outlining the minimum information to be included as well as agreed upon timeframes for reporting of sucha and for GFSI to respond back to the CPO.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	*Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes:* *Acting with fortitude,* *Open to improvement,* *Culturally sensitive,* *Collaborative (not consulting),* *Professional,* *Morally courage,* *Organized*	Reword: "Morally courage" to read "Moral courage"	Opportunity Identified
TA 1	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree	Opportunity Identified
TA 1	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Operational experience should be an acceptable criteria if it is enhanced with food ssafety experience / education.	Opportunity Identified
TA 1	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	The original wording is preferred as it provides CBs the flexibility needed to investigate further/as needed.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree that this is a needed modification.	Opportunity Identified
TA 1	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Agree with there being an indication on the certificate when the certificate is issued against a GFSI-recognized programme.	Couldn't reach consensus
TA 1	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	Agree this is an important addition. Having said this, it should be noted that for primary production corrective action implementation may not be possible until the next season, etc.	Couldn't reach consensus
TA 1	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Agree	Opportunity Identified
TA 1	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.			Opportunity Identified
TA 1	Part II	1.11	Certification Programme Development and Maintenance	The consultation period shall allow sufficient time for stakeholders to review the Certification Programme under development and send their comments to the Certification Programme Owner.			Opportunity Identified
TA 1	Part II	3.1	Relationship with Certification Bodies	The Certification Programme Owner shall have contractual and enforceable arrangements with all Certification Bodies accredited to ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003 to operate their Certification Programme.			Couldn't reach consensus
TA 1	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).			Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.			Couldn't reach consensus
TA 1	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.			Couldn't reach consensus
TA 1	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.			Opportunity Identified
TA 1	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*		Couldn't reach consensus
TA 1	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.			Couldn't reach consensus
TA 1	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.			Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.		Opportunity Identified
TA 1	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.		Couldn't reach consensus
TA 1	Part II	4.15	Maintenance of Auditor Skills and Competence	In specific situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.			Opportunity Identified
TA 1	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available		Couldn't reach consensus
TA 1	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.		Couldn't reach consensus
TA 1	Part II	5.34	Use of ICT during the audit	The CPO shall specify the maximum period of time between the beginning and the end of all audit activities included in the audit duration to maintain the audit efficiency and integrity. That period of time shall not exceed 30 days.			Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*		Opportunity Identified
TA 1	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*		Couldn't reach consensus
TA 1	Part II	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 and independent from the sites.	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 ~~and independent~~ from the sites.		Couldn't reach consensus
TA 1	Part II	6.16	Internal audit	Clear requirements for internal auditors and technical reviewers shall be defined, documented and reviewed by the Certification Body.	Clear requirements for internal auditors and ~~technical~~ reviewers shall be defined, documented and reviewed by the Certification Body.		Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.		Couldn't reach consensus
TA 1	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*		Agree
TA 1	Part II	6.32	Certificates	If the multi-site organisation is allowed to sell their product outside of the group or multi-site organisation, in all cases the member sites shall be transparent about the source and scope of certification, by providing customers with a copy of the certificate as issued above.	Certificate to include detailed description of the scope as it relates to the inclusion of Head Office or not.		Couldn't reach consensus
TA 1	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.		Opportunity Identified
TA 1	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Agree	Opportunity Identified
TA 1	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Support wording that aligns with Codex.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	Agree. Having said this, the last part of the proposed addition seems unnecessarily wordy ("to demonstrate the effective operation the Food Safety Management System."). This could be deleted without changing the intent of the requirement.	Agree
TA 1	Part III FSMS	18.3	Product labelling and product information		Suggest adding a clause for the management of packaging material during production to verify the correct material is being used on the production line.	Agree	Agree
TA 1	Part III FSMS	26	Change Management	Change control shall be undertaken and documented to evaluate the impacts of any changes/ modifications on equipment/building hygienic design.	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.	Agree	Agree
TA 1	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	Agree. However, is this not already covered under Element 3?	Couldn't reach consensus
TA 1	Part III GAP	3.1	Location, design and layout	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Structures, including all adjoining rooms, equipment, facilities and feeding systems shall be located, designed and constructed to facilitate proper cleaning, disinfection and pest control. Where appropriate, the design and layout shall permit compliance with good hygiene practices including protection against cross contamination between and during operations.	Agree. Having said this, "sanitizing" preferred over "disinfection".	Couldn't reach consensus
TA 1	Part III GAP	4.3	Prevention of cross-contamination	Feed shall be stored securely and handled separately from waste liquids, untreated manure, hazardous substances, veterinary medication and cleaning chemicals.		Feed is at times integrated with veterinary medication. Suggestion: veterinary medication is defined as those inputs not used for feed.	Opportunity Identified
TA 1	Part III GAP	4.4.1	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 microbial or chemical contamination		Suggestion to include: physical contamiantion as well e.g., open bucket in barn dispensing water meds through dosatron.	Opportunity Identified
TA 1	Part III GAP	8.3	Housekeeping, cleaning and disinfection	Cleaning procedures shall be reflective of the type of capture and production system, its intensity and the animal species.		Agree	Agree
TA 1	Part III 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, equipment and post-harvest washing, with appropriate facilities for its storage and distribution.	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.	Agree	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Disagree with the proposed addition. Documenting the rationale for which agricultural chemicals are selected is not necessary when the requirements in 14.3 and 14.6 are followed (i.e., only approved chemicals are used, and legislation and label directions are followed. Chemical use that adheres to applicable legislation is considered safe for consumers. Documenting decisions around chemical use for reasons other than food safety (e.g., environmental protection) is outside of GFSI's scope.	Agree
TA 1	Part III GAP	3.3	Location, design and layout	The site facility shall be fenced and the entry points controlled by lockable gates.			Opportunity Identified
TA 1	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.		Opportunity Identified
TA 1	Part III GAP	12.8	Waste management - manure	Farmyard manure shall be collected in a fixed location with suitable services fitted with a firm and tidewater impermeable ground slab. Poultry manure shall not be regarded as solid manure and shall be treated accordingly.			Misunderstood
TA 1	Part III GAP	14.3	Input - Agricultural chemicals	Only agricultural chemicals which are authorised for the cultivation of the specific produce / grains and pulses shall be used. They shall be used according to the manufacturer's instructions, local legislations and for the intended purpose.			Couldn't reach consensus
TA 1	Part III GAP	14.9	Input - Approved medicines and vaccines	All documentation shall be completed or verified by the veterinarian or recognised competent adviser.			Couldn't reach consensus
TA 1	Part III 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 should be recorded and verified.	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 be recorded and verified.	Agree	Agree
TA 1	Part III GMP	7.3	Training	Procedure shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	Procedures shall be established, implemented and maintained to ensure all employees and contractors involved in building construction and equipment installation, undertaken at a site handling food shall be trained in food safety principles appropriate to their task.	Agree	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part III GMP	8.1.1	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.	Procedures for housekeeping, cleaning and disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a food safety risk.	Agree	Agree
TA 1	Part III GMP	8.1.2	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a feed safety risk.	Procedures for housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness shall be verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a feed safety risk.	Agree	Agree
TA 1	Part III GMP	8.1.3	Housekeeping, cleaning and disinfection	Procedure of housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks of cleaning shall be validated and verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a packaging safety risk.	Procedures for housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks of cleaning shall be validated and verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a packaging safety risk.	Agree	Agree
TA 1	Part III GMP	11	Air and water quality	Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Air, compressed gases, and water (including ice and steam) in any form which directly or indirectly could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.	Agree	Couldn't reach consensus
TA 1	Part III GMP	11.1	Water as an ingredient		*Add a requirement around potability. When using water as an ingredient in food, it should be potable (CXG 100-2023)*	Agree	Opportunity Identified
TA 1	Part III GMP	13	Pest control	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.	A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation on site, including the risk of pest harborage in clutter, waste and stagnant water.	Agree	Couldn't reach consensus
TA 1	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Agree (i.e. allergens considered under chemical hazard).	Opportunity Identified
TA 1	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	Agree	Opportunity Identified
TA 1	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Agree	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 1	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	Agree	Opportunity Identified
TA 1	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	Agree	Opportunity Identified
TA 1	Part III HACCP	1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	The Hazard and Risk Management System shall be reviewed at a minimum set frequency, and in case of any change that impacts food safety, such as but not limited to temporary, emergency, unplanned, planned changes.	Agree	Opportunity Identified
TA 1	Part III HACCP	1.5	Hygienic design process	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new buildings/equipment.	A competent multidisciplinary team shall assess the hygienic design and risk assessment of new and existing buildings/equipment, including upgrade or improvements.	Agree	Agree
TA 1	Part III HACCP	1.6	Hygienic design process	The hygienic design and suitability of buildings and equipment shall be evaluated throughout their life cycle from the design concept, through construction, purchasing and during use, until the end of their intended life.	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.	Agree	Agree
TA 1	Part III HACCP	1.11	Hygienic design principles	Buildings and equipment shall be of a cleanable design, to meet all cleaning objectives.	Buildings and equipment shall be of hygienic sanitary design, to meet ~~all~~ cleaning objectives.	Agree	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 2	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		There needs to be a very clear process for continued recognition in the event a programme is reviewed and changes are made while it is GFSI recognised. This needs to be allowed to happen freely. The continued recognition process is currently loose and gives little confidence that a programme can be updated and improved while maintaining its recognition. It seems arbitrary to treat a programme aiming to improve food safety outcomes in the same way as one that has been suspended. As the (ORGANISATION), we strongly advocate for harmonization of food safety standards across global supply chains, and we fully support the efforts of the Global Food Safety Initiative (GFSI) to create uniformity and raise the standard of food safety management systems. The principles underpinning GFSI recognition are critical to ensuring robust and science-based food safety practices across the fresh produce industry. FPSC-ANZ serves as the custodian of the Guidelines for Fresh Produce Food Safety, which provide the scientific basis for control measures implemented as	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 2	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	The timeframe for continued recognition when GFSI makes a change should be extended to 12 months. This would provide Certification Programme Owners (CPOs) with sufficient time to align their programmes with new GFSI requirements without compromising their recognition status or causing unnecessary disruptions. Additionally, there is no detailed explanation provided regarding the process for continued recognition (see comments regarding Row 18 above). It is unclear whether re-assessment and continued recognition are considered the same process. Further clarification is needed to distinguish whether the process for assessment is identical when GFSI updates its version compared to when a CPO updates its version. The entire area of re-assessments and continued recognition—whether initiated by GFSI updates or by CPOs—lacks clarity. Moreover, information related to these processes is currently scattered across sections such as Eligibility, Application, and Monitoring, making it difficult to understand the overarching procedures. A more consolidated and streamlined	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 2	Part I	5	Key procedural steps	A => Application		FOLLOWING CLAUSE NOT INCLUDED IN CONSULTATION DOCUMENT: "In the year prior to the publication of a new version of the GFSI Benchmarking Requirements, no new application will be accepted. A notice will be displayed on the GFSI website to indicate the starting date of this one-year period." Comment on the Clause Above: With the requirement for Certification Programme Owners (CPOs) to apply for re-assessment within 9 months of a new GFSI version being published, the necessity of prohibiting applications 12 months prior to a new GFSI version is unclear. If a CPO understands they will need to re-submit soon after gaining recognition, the decision to apply should rest with them. Removing this one-year restriction allows CPOs the flexibility to plan, while also providing GFSI more time to conduct thorough reviews without the pressure of a 12-month cut-off period. It would also be beneficial for GFSI to publicly provide long-term review plans and timelines, enabling CPOs to better plan and align their reviews and updates with new food safety requirements. This would improve efficiency and support the continuous enhancement of food safety outcomes	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 2	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	FPSC-ANZ would like to provide feedback regarding the update to PART III HACCP – Clause 1.1.1, which references the latest version of the Codex Alimentarius General Principles of Food Hygiene. We believe it is critical to consider change management for industry participants when incorporating updates to external references, such as Codex. The current update does not account for the practical challenges the industry faces when implementing immediate changes to standards. There must be a structured system for managing these changes, allowing organizations time to adapt and align their operations with new requirements. Instant incorporation of changes to external reference documents, like Codex, into a standard is not always feasible. Additionally, we would like to reference the FPSC Guidelines for Fresh Produce Food Safety, which provide a framework and resources that support the implementation of updated food safety practices for fresh produce in alignment with evolving standards. This resource could assist in supporting the industry through periods of transition and change. https://fpsc-anz.com/food-	Opportunity Identified
TA 3	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Specification for 12 month requirement is a duplication of above.	Misunderstood
TA 3	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	As a general comment in relation to all of Part I, the clauses need numbering. A review process like this is very difficult without the abilty to cross reference interrlated areas. Also, not including all clauses in a consultation document requires reviewers to go back to source document and input detail into consultation document themselves which makes the process very difficult, unclear and inconsistent.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	1. Agree with 12 months **operating as an accredited Food Safety Progamme prior to NEW GFSI applications** but do not agree with 12 months implementation of the version being used for the application (see comments in Row 10 below relation to how this links with versions). 2.The WG comment relates to no minimum implementation duration of a specific version in relation to continued recognition which we support. Not being able to update a standard and have continued recognition removes the ability for continous improvement and may have detrimental impacts on Food Safety Outcomes. The process for continued recogntion in the event of a version change is unclear and overall, the differences between new applications and continued recognition processes needs to be clarified. Generally the information is dispersed across different sections and not all in one place.	Opportunity Identified
TA 3	Part I	1	Eligibility Criteria	• The Certification Programme Owner has undertaken a self-assessment to validate that it is in alignment with the GFSI Benchmarking Requirements.		If the requirement for a 12 month implementation of the verison being submitted were to be kept (which we do not support), this requirement needs to be more clearly linked to the 12 month implementation of the version being submittted. If a CPO were to review their programme and make change, the cannot submit for 12 months.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		There needs to be a very clear process for continued recogniton in the event a programme is reviewed and changes are made while it is GFSI recognised. This needs to be allowed to happen freely . The continued recognition process is loose and gives no confidence that a programme can be updated and improved and recognition maintained. It seems arbitrary and doesn't seem right to have a programme that is aiming to be updated to improve Food Safety Outcomes in the same process as a programme that has been suspended. **The comment above relates to the following clauses in Section 3 "Application Options" which as not been included in the consultation document.** Certification Programme Owners shall apply for continued recognition if the Certification Programme in the application is: • Recognised by GFSI against the current version of the GFSI Benchmarking Requirements but will be subjected to changes which could compromise its GFSI Recognition, such as changes to its	Opportunity Identified
TA 3	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	The timeframe in relation to continued recognition when GFSI make a change should be 12 months. Also, there is no detail given in relation to the process (see comments in relation to Row 18 above). Is re-assessment the same as continued recognition? Is the process for assessment the same when GFSI updates their version as when a CPO updates a version? The whole area of re-assessments and continued recognion based on GFSI or CPO's updates is not clear. Also, information in relation to re-assessments and continued recognition is spread between elegibility, application and monitoring sections. It is not clear and needs an overhaul.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part I	5	Key procedural steps		Consider allowing re-application within less than 12-month period, where the CPO implemented the required actions Question on the number 10 as the required number of certificates (need tangible criteria for defining a threshold) Use more concise descriptions of the steps (bullet points, flowcharts or diagrams to visually represent the procedural steps) This can help readers quickly understand the process flow and the relationships between different steps Maintain a uniform structure for each procedural step. Start each section with a brief overview, followed by detailed steps Provide more context or examples where necessary. Explain why certain steps are important or what the implications are if they are not followed correctly. Include real-world examples or case studies to illustrate the application of these steps Include a section on common issues or FAQs that might arise during the procedural steps, along with solutions or best practices Highlight any critical compliance or legal requirements associated with each procedural step. This can prevent potential oversights that may have legal implication	Assume this is in relation to a suspension? Not sure that suspension should be included in continued recognition process. Information in relation to re-assessments,continued recognition and suspensions is spread between elegibility, application and monitoring sections. It is not clear and needs a thorough review. Would support re-entry within less than 12 months if required actions have been implemented but process needs to be clear.	Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part I	5	Key procedural steps	A => Application		**FOLLOWING CLAUSE NOT INCLUDED IN CONSULTATION DOCUMENT** *In the year prior to the publication of a new version* *of the GFSI Benchmarking Requirements, no new* *application will be accepted. A notice will be displayed* *on the GFSI website to indicate the starting date of* *this one-year period.* ***Comment below in relation to clause above.*** With the requirement to apply for re-assessment within 9 months of a new GFSI version being published why does there need to be a requirement for no applications 12 months prior to a new GFSI version. If a CPO understood they would need to re-submit soon after recognition the decision whether or not to apply would be up to them. Removing this one year time limit also allows GFSI to undertake a thorough review and not be pressured to complete within 12 months. It would be benefical for GFSI to provide publically available long term plans for review timeframes to enable forward planning for CPO's to align reviews to more efficiently update CP's with new Food Safety Outcomes	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part I	5	Key procedural steps	H => Annual Monitoring of continued alignment		Twice a year, the Benchmark Leader will remotely select at least five random audits, performed by various Certification Bodies and send the Certification Programme Owner a list of objective evidence and files related to these audits to verify alignment of Part II of the GFSI Benchmarking Requirements, including but not restricted to: • Certificate and report and / or auditor notes, • Contract with the Certification Body, • Examination file of the auditor, • Scope allowance of the auditor. **Following comment in relation to the clause above not included in the consultation document.** This seems like the role of the Accreditation Body. Additionally there is a requirement for CPO's to carry out reviews as well. Why does this need to be duplicated? Gap analysis Once a year, typically in conjunction with the first random record review, the Benchmark Leader will	Opportunity Identified
TA 3	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	It seems very insular and could be perceived as protectionism not to include other perspectives in Appeals Committee. CB's and CPO's are the eyes and ears of the programmes and are able to provide valuable input into decision making from a perspective different to industry. Actively excluding them from committees such as this creates an element of distrust.	Misunderstood
TA 3	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		These actions and decisions are very subjective. There is no examples of the types of issues that lead to various levels of action/sanction.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.	Support the option of only 1 CB. For smaller CP's the requirement to have more than one CB can create problems. For example, one CB may have only a small number of certified operators meaning meeting minimum annual audit numbers and maintaining auditor competency can be challenging.	Couldn't reach consensus
TA 3	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Agree needs further clarification.	Opportunity Identified
TA 3	Part I	1	Eligibility Criteria	These certificates shall be issued against the version of Certification Programme concerned by the application,		This clause is potentially impacting the ability for CPO's to make change and update the standard prior to and during the GFSI recognition process. Not making or delaying updates because a CPO wants to fulfill the GFSI requirement of 12 month implementation of the **version** being submitted impacts Food Safety Outcomes. Combine this with the up to 12 months recognition process means the CPO is not able to make changes to the standard for 2 years. This stifles the ability for change and continuous improvement at both the programme and producer level. Furthermore, if the submitted version is then recognised and the CPO wants to make changes, the continued recognition process is unclear. Also, for new applicants, working through the timing of applications in relation to the '2 -year hiatus', their own reviews and then anticipating GFSI reviews is very difficult and creates delays. This creates issues for suppliers wanting GFSI recognised standards as there is constant uncertainty as to when it will be available. This in turn is enabling supply without GFSI recognition as in some instances retailers have not choice but to accept product from a non GFSI recognised programme	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	Continued recogniton process is unclear and does not relate to re-assessment although both will address a change in CP verison. The only difference is one is instigated by CPO and one is instigated by updated GFSI version.	Opportunity Identified
TA 3	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	The intent of this clause is unclear. While we agree there needs to be actions to mitigate an actual food safety event, this clause seems more focussed on the publicity surrounding the event. Very broadly 'mitigating a situation' is the entire certification and accreditation programme. The intent of this clause needs to be clarified - is it about managing the situation or the publicity in the event of a food safety incident? It can be both but clarity is required. With respect to GFSI defined procedures for handling incidents, if this includes expectations in relation to how a CPO should act these requirements must be shared with CPO's.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part II	4.6.1	Auditors Behaviour	If the Certification Programme Owner allows the use of ICT to assess auditor behaviour as per 4.6, the Certification Programme Owner shall ensure that IAFMD4 is included as a normative reference of their Certification Body requirements on assessing auditor behaviour.	Suggest to include a minimum frequency of witness assessments. And specific requirements that the witness assessor should be onsite or at least for 1 day of the audit. As per the requirements for ICT auditing of organizations, there should be mandatory portions of the auditor assessment that must be completed in person. Covered in 4.10.2, but should be extended beyond initial auditor qualification.	In general support the use of ICT. Would support introduction of a minimum frequency of witness assessment. Wording needs to accommodate audits that take less than one day. This could possibly be accommodated by specifying the need for onsite for key aspects of audit. See comments in 4.10.2 below in relation to ICT for witness assessments supporting witness assessments being completed using ICT so long as effectiveness maintained. Althougth it is unclear - if the WG comment also intends that assessments other than witness assessments cannot be completed using ICT we would not support this. Would we support onsite witness assessments? What would frequency be?	Opportunity Identified
TA 3	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	Including all auditor requirements in one place would be clearer rather than splitting between Table One and this clause.	Opportunity Identified
TA 3	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Including all auditor requirements in one place would be clearer rather than splitting between Table One and this clause.	Opportunity Identified
TA 3	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	Would support the need to include on audit reports as it may inform subsequent audits.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Assuming the contracted organisation is the CB, we would question the ownership of the audit report remains with the CB. If the contacted organisation is the operator/producer then we support this clause.	Couldn't reach consensus
TA 3	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	Agree add clarity around HO/central function to avoid confusion. Also, if a certification were issued that included HO where the audit had not included all standard requirements there would need to be parameters around this?	Couldn't reach consensus
TA 3	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages	It is difficult to determine exactly what this comment means? If it is in relation to GFSI monitoring process of CPO's this should be on GFSI pages if it is felt there needs to be more transparency.	Couldn't reach consensus
TA 3	Part II	4.6	Auditors 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 Program Owner. The following includes examples of required personal attributes and behaviour: - Ethical; i.e. fair, truthful, sincere, honest and discreet, - Open minded; i.e. willing to consider alternative ideas or points of view, - Diplomatic; i.e. tactful in dealing with people, - Observant; i.e. actively aware of physical surroundings and activities, - Perceptive; i.e. instinctive, aware of and able to understand situations, - Versatile; i.e. adjusts readily to different situations, - Tenacious; i.e. persistent, focussed on achieving objectives, - Decisive; i.e. timely conclusions based on logical reasoning, - Self-reliant; i.e. acts independently whilst interacting effectively with others, - Integrity; i.e. aware of need for confidentiality and observes professional codes of conduct.	Add reference to ISO 19011 criteria on this matter and suggest to also include the following attributes: Acting with fortitude, Open to improvement, Culturally sensitive, Collaborative (not consulting), Professional, Morally courage, Organized	Examples are valid but will be very wordy with lots of examples. Consideration needs to be given to grouping somehow.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree with WG comments and reasons. Remove the emphasis on education, experience needs to be an alternative with the CPO determing what is relevant.	Opportunity Identified
TA 3	Part II	4.10	Initial Auditor Qualification	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	The Certification Programme Owner shall ensure that Certification Bodies have a documented program for initial auditor qualification respective of a given certification programme. This shall include as a minimum that auditors will be assessed on their performance during at least 3 food safety audits against the GFSI-recognised Certification Programme the auditor is being qualified for, including at least one witness audit, and until they are assessed as competent.	Suggested wording does not add clarity. Is it meant to be 'relating' to ….? Talk to CB in relation to 'frequency' of witness audits. Also clarity of witness audit and peer review??	Opportunity Identified
TA 3	Part II	4.10.2	Initial Auditor Qualification	The Certification Programme Owner shall ensure that the witness audit(s) carried out as part of the certification body's initial auditor qualification follows the standard audit plan agreed with the certified organisation, including the use of ICT if applicable, as long as this does not compromise the effectiveness of the assessment. The Certification Programme Owner shall ensure that the witness assessor is present on site for parts of the audit carried out on site.	Suggest to introduce a distinction for 1st approval where the entire witness audit should be conducted on site (no permitted use of ICT).	Would not support the proposed change. Would want to see the retention of the abilty to use ICT ensuring there is no compromise to effectiveness of the assessment. Retaining the need for part of the witness assesement to be completed on-site provides the ability to focus on certain areas if necessary.	Opportunity Identified
TA 3	Part II	4.11	Scope Extension of Auditor Activities	The Certification Programme Owner shall ensure that Certification Bodies require an auditor extending his 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.	Suggest to authorise the use of ICT for the supervised audit as in case of scope extension	Would support this.	Opportunity Identified
TA 3	Part II	4.14	Maintenance of Auditor Skills and Competence	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes owned by the Certification Program Owner to maintain sector and Certification Programme knowledge.	The Certification Programme Owner shall ensure that the Certification Bodies implement an annual programme for auditors to carry out at least five on-site audits at different organisations against any of the relevant GFSI-recognised Certification Programmes ~~owned by the Certification Program Owner~~ to maintain sector and Certification Programme knowledge.	Although not related to this clause this requirement supports the need to have the option of only one CB auditing the Programme (in Eligibility Criteria Section). For smaller CPO's having to split audits across CB's may make this clause difficult to fultill for each auditor as they may not have enough registered operators and no alternative GFSI recognised schemes to enact 4.15 below.	Couldn't reach consensus
TA 3	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Additional audit requirements upt to CPO to define to ensure consistency of administration of programme across across CB's.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.	Would support this proposal. There are a number of issues in relation to completing entirely uannounced audits. The seasonal nature of primary industries and rural locations with significant travel distances are obvious issues. Unannounced audits are particluarly hard for smaller operators who may have very small teams - to lose a team member for a day or more can have a significant impact on operations, particularly at critical times of the year. Health and safety also needs to be taken into consideration.	Opportunity Identified
TA 3	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Would support an indication on cerificate that is issued against a GFSI recognised programme.	Couldn't reach consensus
TA 3	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	Agree	Couldn't reach consensus
TA 3	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Support the concept of clarity of requirements applicable to central function versus at producer level. The intent of the second point is unclear. Clause 6.7 specifies the requirement for central function to be audited annually. Or is the intention that all sites have some aspects audited annually - if that were the case we would not support this. Each site is internally audited annually and the central function and a sample of sites are audited annually. This approach is not looking at the system in its entirety.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 3	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	Would support CPO's specifying a portion of audits can be completed prior to central function. Due to seasonality in primary industry and dependent on variety of crops included this is necessary at times.	Couldn't reach consensus
TA 3	Part II	6.33	General requirements	Multi-site certification shall only apply to organisations with more than 20 sites operating similar processes.	Question on the number 20.	It is a commercial decision for an operator to decide how they want to structure their certificaiton and whether they want multi-site certification. Would suggest no number. Multi-site certification is about central management not the number of sites.	Opportunity Identified
TA 3	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Leave as "Specifications shall be established…" given it covers inputs and services e.g. pest control services. Specifications may be established for this but can they be linked back to scientific principles?	Opportunity Identified
TA 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	No additional references	Agree
TA 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Keep 2 CBs as a minimum	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Delete examples since they may or may not impact the quality of the delivery of the GFSI recognized certification program and could be interpreted as the requirement itself. Requirement could be removed altogether, or we would support the addition of the following wording: "a situation potentially impacting the quality of the delivery of the GFSI recognised certification programme". A change of ownership or changes to key personnel do not automatically mean that the programme has stopped operating effectively. The changes could in fact lead to improved delivery of the programme.	Opportunity Identified
TA 4	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Agree with WG comments - the process for new and existing CPOs should be different.	Couldn't reach consensus
TA 4	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	We do not support the WG suggestion. Timeline may be beyond the CPO's control.	Agree
TA 4	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Suggest changing the eligibility criteria for recognized programs so that GFSI can perform a continued recognition assessment of an existing GFSI recognized program (in good standing) to the new requirements prior to implementation. These continued recognition assessments should cover both Part II and Part III requirements with the goal of making the audit transition for participating facilities much more fluid. If this could occur the recognized CPOs would be able to implement the required changes, the CBs would be able to update their accreditation to the new program version, and program participants would not need to go through duplicative audits awaiting completion of the re-benchmarking process.	Opportunity Identified
TA 4	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	Agree with WG comments - the current GFSI scopes align with ISO 22003	Agree

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		The full application process should not apply to existing recognized CPOs. Re-benchmarking could be completed within a 'continued recognition' process. For already recognized programmes, there is no need to demonstrate market demand by submitting 10 certificates per GFSI scope.	Couldn't reach consensus
TA 4	Part I	4	Methodology	Benchmark Leader	GFSI Benchmark Leader	Conflict of interest requirements to be defined and be at least 2 years, aligned with current ISO principles	Couldn't reach consensus
TA 4	Part I	4	Methodology	GFSI Executive Director	GFSI Director	They may reassign the Benchmark Leader at any time, with sufficient notification to the CPO. The current workplan of the CPO benchmarking or MCA processes shall not be negatively impacted as a result.	Couldn't reach consensus
TA 4	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Suggest CPOs be given 12 months to reapply against new benchmarking requirements, to allow for effective change management within the CPO and implementation of version updates within CBs and FBOs	Couldn't reach consensus
TA 4	Part I	5	Key procedural steps		Consider allowing re-application within less than 12-month period, where the CPO implemented the required actions Question on the number 10 as the required number of certificates (need tangible criteria for defining a threshold) Use more concise descriptions of the steps (bullet points, flowcharts or diagrams to visually represent the procedural steps) This can help readers quickly understand the process flow and the relationships between different steps Maintain a uniform structure for each procedural step. Start each section with a brief overview, followed by detailed steps Provide more context or examples where necessary. Explain why certain steps are important or what the implications are if they are not followed correctly. Include real-world examples or case studies to illustrate the application of these steps Include a section on common issues or FAQs that might arise during the procedural steps, along with solutions or best practices Highlight any critical compliance or legal requirements associated with each procedural step. This can prevent potential oversights that may have legal implication	Agree with first point Remove the 10 certificate requirement	Opportunity Identified
TA 4	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	"Preventative actions" is not appropriate at CPO level; keep current wording as is	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part I	5	Key procedural steps	A => Application		Proposed revision: In the year prior to publication of a new version of the GFSI benchmarking requirements, no new application will be accepted. A notice will be displayed on the GFSI website to indicate the starting date of this one-year period, and existing GFSI recognized CPOs will be informed in writing/via email	Opportunity Identified
TA 4	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Steering Committee decision and communicating to the CPO	Couldn't reach consensus
TA 4	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Agree with WG comment	Agree
TA 4	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Agree with first point There should be at least one member (preferably more) of the Appeals Committee who has expertise in practical application of the GFSI BMRs and who has knowledge specific to the scope/sector in question. This would ensure that the Committee has an understanding of the entire process.	Agree
TA 4	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		There should be a published timeframe for identification of non-alignment, response (e.g. CAP) and corrective actions taken by the CPO, and sanctions.	Couldn't reach consensus
TA 4	Part I	6	Sanctioning	This recommendation is passed to the GFSI Executive Director and the GFSI Board for final decision. The GFSI Technical Manager will inform the Certification Programme Owner of this final decision, including a full explanation for it.		Revise 'Board' to 'Steering Committee'	Agree
TA 4	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		Suggested addition: The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time to prepare a stakeholder communication plan, prior to the suspension being published on the GFSI website.	Agree
TA 4	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		Suggested addition: The CPO shall be informed in writing in the case of withdrawal, prior to the withdrawal being published on the GFSI website.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part I	6	Sanctioning	The Certification Programme Owner has the right to appeal against any decision made by the GFSI Board, the GFSI Executive Director or any person contracted to GFSI in relation to the Benchmarking Process.		Revise 'Board' to 'Steering Committee'	Agree
TA 4	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	The 'continued recognition' process should encompass Part II and Part III assessments for GFSI recognized organizations going through the re-benchmarking process against a new version of the GFSI requirements.	Opportunity Identified
TA 4	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.		Align definition of 'ownership' with Part I definition	Agree
TA 4	Part II	1.11	Certification Programme Development and Maintenance	The consultation period shall allow sufficient time for stakeholders to review the Certification Programme under development and send their comments to the Certification Programme Owner.		9 month timeframe for currently recognized CPO to apply for re-benchmarking is in conflict with this requirement. CPO version update processes (including stakeholder consultation) have a longer timeframe than 9 months - to draft, consult on, refine and implement changes.	Opportunity Identified
TA 4	Part II	3.1	Relationship with Certification Bodies	The Certification Programme Owner shall have contractual and enforceable arrangements with all Certification Bodies accredited to ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003 to operate their Certification Programme.		Duplication. Accreditation requirements should not be repeated in the benchmarking requirements, since it is a GFSI requirement for CBs to be accredited.	Couldn't reach consensus
TA 4	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		There needs to be an implementation period of up to 18 months for CPOs to incorporate references into normative documents from standards that are external to the CPO. Transitioning to current versions of IAF MD4, IAF MD1, Codex, etc. cannot happen without a suitable delay. These standards are subject to review on different timeframes that will not always align with CPO update and revision processes.	Couldn't reach consensus
TA 4	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus
TA 4	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Remove: "at all times" or reword (e.g., "upon request").	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Examples are too broad and need to be clarified. A serious food safety situation is an outbreak. When reporting to GFSI is required, additional requirements outlining the minimum information should be included. Also need agreed upon timeframes for reporting and for GFSI to respond back to the CPO.	Opportunity Identified
TA 4	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		Remove product recalls from the list of risk factors as # of company recalls is not a metric linked to CB performance	Opportunity Identified
TA 4	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	We do not support publication of CB KPI results. This info is provided to GFSI during CPO assessments. KPIs are intended to drive or reinforce good performance to CPO's program and are intended to be used to optimized the program, drive collaboration and open communication with CBs. Since KPIs are very much driven by the CPO they are likely unique to each program with different criteria and may lead to confusion if results are published.	Couldn't reach consensus
TA 4	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus
TA 4	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree. Remove the emphasis on the specific education requirement. Having a degree in a specific field does not make a good auditor and is currently a restriction to onboard new auditors. An evaluation of the candidate's education can be included in the auditor qualifications; however, the years of industry and auditing experience, in addition to continuing education courses should be granted more value. Provide an avenue for additional training or a plan for further education vs only using higher education.	Opportunity Identified
TA 4	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	We do not support WG suggestion. Removing "quality assurance" experience will make it even harder to find auditors who meet the requirements. It's very hard to find primary ag auditors who have 2 years FT in a food safety role	Opportunity Identified
TA 4	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Need to allow for grandfathering of existing auditors and have requirements linked to the benchmarking version in effect at the time of qualification. Only new entrants need to meet current requirements.	Opportunity Identified
TA 4	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Leave the requirement as it is currently worded. For exports, the onus is on the FBO to obtain and provide to the auditor relevant information about export market requirements. Auditors cannot be expected to be familiar with the relevant laws and regulations in an unlimited number of export markets.	Agree
TA 4	Part II	4.15	Maintenance of Auditor Skills and Competence	In specific situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.		If WG proposed changes to 4.14 are accepted, then 4.15 is not needed.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
TA 4	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Leave the requirement as it is currently worded, or change to 'where the integrity of the certification could be at risk'. Having a "type" of non-conformity is not a requirement for CPO standards. Broader/more generic wording gives the CBs the flexibility they need to investigate as needed.	Agree
TA 4	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree that this is a much-needed modification.	Opportunity Identified
TA 4	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	We do not support the WG comment. The information is already required to be on the certificate.	Couldn't reach consensus
TA 4	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Leave wording as is. Confidentiality would have to be preserved for all reports that are proprietary to the FBO.	Couldn't reach consensus
TA 4	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Agree with there being an indication on the certificate when the certificate is issued against a GFSI-recognized programme, as long as that identification is not the GFSI logo (too complex for CBs to manage associated branding rules). Disagree with the preferred method being an "e-solution" / database as this is more onerous to manage and would add further complexity to the system, since the certificate is issued by the certification body. Info about CPO suspension is publicly available on GFSI website.	Couldn't reach consensus
TA 4	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	Agree	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Agree	Opportunity Identified
TA 4	Part II	5.34	Use of ICT during the audit	The CPO shall specify the maximum period of time between the beginning and the end of all audit activities included in the audit duration to maintain the audit efficiency and integrity. That period of time shall not exceed 30 days.		Clarify that the 30 day timeline refers to a single audit being carried out, and does not apply to auditing the sites in a multi-site certification.	Couldn't reach consensus
TA 4	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Difficult to evaluate proposal until draft text is available for comment	Opportunity Identified
TA 4	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	Propose to add as follows: If necessary, a small number of the sample sites may be audited prior to the audit of the central function, with proper justification	Couldn't reach consensus
TA 4	Part II	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 and independent from the sites.	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 ~~and independent~~ from the sites.	Leave as is	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part II	6.16	Internal audit	Clear requirements for internal auditors and technical reviewers shall be defined, documented and reviewed by the Certification Body.	Clear requirements for internal auditors and ~~technical~~ reviewers shall be defined, documented and reviewed by the Certification Body.	Leave as is	Agree
TA 4	Part II	6.21	Site audit sampling	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. 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.	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. 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	Add ISO 22003-1 or ISO 22003-2 as applicable, as sampling requirements are set out in these normative accreditation documents, that are different to IAF MD1. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 4	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 4	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 4	Part II	6.24	Site audit sampling	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.	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 MD1	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements. This WG comment would render all of the CPO standards out of compliance.	Opportunity Identified
TA 4	Part II	6.25	Management of non-conformities	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.	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	Note that IAF MD1 only applies to management system certification.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
TA 4	Part II	6.26	Management of non-conformities	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.	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 MD1	Note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 4	Part II	6.27	Management of non-conformities	If the central function, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including the central function and all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.	Define "critical Certification Programme requirements" or suggest to replace by "leading to major non conformities". Some members suggested " fundamental certification programme requirements".	Change to: fails to meet the certification programme requirements (including not addressing any NCs raised within the defined timelines)	Couldn't reach consensus
TA 4	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	In terms of a multi-site - the central function is responsible and HO terminology should not be introduced here.	Agree
TA 4	Part II	6.32	Certificates	If the multi-site organisation is allowed to sell their product outside of the group or multi-site organisation, in all cases the member sites shall be transparent about the source and scope of certification, by providing customers with a copy of the certificate as issued above.	Certificate to include detailed description of the scope as it relates to the inclusion of Head Office or not.	Already covered by another proposed revision (6.3.1)	Couldn't reach consensus
TA 4	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.		Couldn't reach consensus
TA 4	Part III FSMS	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.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Couldn't reach consensus
TA 4	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	As with Part III HACCP comments - the term 'latest version' needs a system of change management as a change to a Codex document cannot immediately be incorporated into CPO standards. We do not support additional wording proposed by WG. This requirement is about a site's senior management commitment. The evidence of that is built into the site's processes as defined elsewhere in this benchmark; therefore, the proposed addition does not add value.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part III FSMS	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.	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. *Suggest to update according to Codex: Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	We do not support the WG proposal - leave the requirement as is.	Misunderstood
TA 4	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	The last part of the proposed addition seems unnecessarily wordy ("to demonstrate the effective operation the Food Safety Management System.") This could be deleted without changing the intent of the requirement.	Agree
TA 4	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Applicable GFSI scopes are not identified for proposed change. We do not support the proposed addition to the B scopes. If deemed applicable to B scopes, the term 'validation' should be changed to 'verification'.	Opportunity Identified
TA 4	Part III FSMS	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.	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 - add intended consumption as well?	We do not support WG suggestion to add this wording.	Couldn't reach consensus
TA 4	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	Redundant. Already covered by element 3 above (management review)	Couldn't reach consensus
TA 4	Part III GAP	1	Land used for production	Land used for production shall be evaluated for hazards and contamination. Control measures shall be implemented to reduce hazards to acceptable levels.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	We do not support the proposed WG addition. Documenting the rationale for which agricultural chemicals are selected is not necessary when the requirements in 14.3 and 14.6 are followed (i.e., only approved chemicals are used, and legislation and label directions are followed). Chemical use that adheres to applicable legislation is considered safe for consumers. Documenting decisions around chemical use for other reasons (e.g., environmental protection) is outside of GFSI's scope.	Agree
TA 4	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.		Opportunity Identified
TA 4	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified
TA 4	Part III GMP	17	Stock management	A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.		This requirement does not fit for GFSI scope B3 and should be removed for that scope. Stock management of perishable fresh produce items is done for quality reasons. It does not need to be part of a food safety program. Spoiled produce is not saleable and will not be consumed.	Opportunity Identified
TA 4	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified
TA 4	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 4	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified
TA 4	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified
TA 4	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	The hazard analysis, rather than 'the hazard and risk management system' would have already considered the likelihood of occurrence and defined appropriate control measures. The intent of the additional proposed wording is not clear. If the system is effectively implemented in accordance with the HACCP Plan, when would there be an absence of control measures?	Opportunity Identified
TA 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	No additional references	Agree
TA 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.	Ideally, at least 2 CB's would be the minimum, but we do recognize situation's where a smaller CP may only have 1.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Delete examples since they may or may not impact the quality of the delivery of the GFSI recognized certification program and could be interpreted as the requirement itself. Requirement could be removed altogether, or we would support the addition of the following wording: "a situation potentially impacting the quality of the delivery of the GFSI recognised certification programme". A change of ownership or changes to key personnel do not automatically mean that the programme has stopped operating effectively. The changes could in fact lead to improved delivery of the programme.	Opportunity Identified
TA 5	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	See above comment about 12 months operation requirement	Agree with WG comments - the process for new and existing CPOs should be different.	Couldn't reach consensus
TA 5	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	We do not support the WG suggestion. Timeline may be beyond the CPO's control. As a general comment in relation to all of Part I, the clauses need numbering. A review process like this is very difficult without the abilty to cross reference interrlated areas. Also, not including all clauses in a consultation document requires reviewers to go back to source document and input detail into consultation document themselves which makes the process very difficult, unclear and inconsistent.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process. Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.	Suggest changing the eligibility criteria for recognized programs so that GFSI can perform a continued recognition assessment of an existing GFSI recognized program (in good standing) to the new requirements prior to implementation. These continued recognition assessments should cover both Part II and Part III requirements with the goal of making the audit transition for participating facilities much more fluid. If this could occur the recognized CPOs would be able to implement the required changes, the CBs would be able to update their accreditation to the new program version, and program participants would not need to go through duplicative audits awaiting completion of the re-benchmarking process. 1. Agree with 12 months operating as an accredited Food Safety Progamme prior to NEW GFSI applications but do not agree with 12 months implementation of the version being used for the application (see comments in Row 10 below relation to how this links with versions). 2.The WG comment relates to no minimum implementation duration of a specific version in relation to continued recognition which we support. Not being	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part I	1	Eligibility Criteria	These certificates shall be issued against the version of Certification Programme concerned by the application,		This clause is potentially impacting the ability for CPO's to make change and update the standard prior to and during the GFSI recognition process. Not making or delaying updates because a CPO wants to fulfill the GFSI requirement of 12 month implementation of the **version** being submitted impacts Food Safety Outcomes. Combine this with the up to 12 months recognition process means the CPO is not able to make changes to the standard for 2 years. This stifles the ability for change and continuous improvement at both the programme and producer level. Furthermore, if the submitted version is then recognised and the CPO wants to make changes, the continued recognition process is unclear. Also, for new applicants, working through the timing of applications in relation to the '2 -year hiatus', their own reviews and then anticipating GFSI reviews is very difficult and creates delays. This creates issues for suppliers wanting GFSI recognised standards as there is constant uncertainty as to when it will be available. This in turn is enabling supply without GFSI recognition as in some instances retailers have not choice but to accept product from a non GFSI recognised programme	Opportunity Identified
TA 5	Part I	1	Eligibility Criteria	• The Certification Programme Owner has undertaken a self-assessment to validate that it is in alignment with the GFSI Benchmarking Requirements.		If the requirement for a 12 month implementation of the verison being submitted were to be kept (which we do not support), this requirement needs to be more clearly linked to the 12 month implementation of the version being submittted. If a CPO were to review their programme and make change, the cannot submit for 12 months.	Couldn't reach consensus
TA 5	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	Agree with WG comments - the current GFSI scopes align with ISO 22003	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		The full application process should not apply to existing recognized CPOs. Re-benchmarking could be completed within a 'continued recognition' process. For already recognized programmes, there is no need to demonstrate market demand by submitting 10 certificates per GFSI scope. There needs to be a very clear process for continued recogniton in the event a programme is reviewed and changes are made while it is GFSI recognised. This needs to be allowed to happen freely . The continued recognition process is loose and gives no confidence that a programme can be updated and improved and recognition maintained. It seems arbitrary and doesn't seem right to have a programme that is aiming to be updated to improve Food Safety Outcomes in the same process as a programme that has been suspended. The comment above relates to the following clauses in Section 3 "Application Options" which as not been included in the consultation document. Certification Programme Owners shall apply for continued recognition if the Certification Programme in the application is: • Recognised by GFSI against the current	Couldn't reach consensus
TA 5	Part I	4	Methodology	Benchmark Leader	GFSI Benchmark Leader	Conflict of interest requirements to be defined and be at least 2 years, aligned with current ISO principles	Couldn't reach consensus
TA 5	Part I	4	Methodology	GFSI Executive Director	GFSI Director	They may reassign the Benchmark Leader at any time, with sufficient notification to the CPO. The current workplan of the CPO benchmarking or MCA processes shall not be negatively impacted as a result.	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Suggest CPOs be given 12 months to reapply against new benchmarking requirements, to allow for effective change management within the CPO and implementation of version updates within CBs and FBOs Also, there is no detail given in relation to the process (see comments in relation to Row 18 above). Is re-assessment the same as continued recognition? Is the process for assessment the same when GFSI updates their version as when a CPO updates a version? The whole area of re-assessments and continued recognion based on GFSI or CPO's updates is not clear. Also, information in relation to re-assessments and continued recognition is spread between elegibility, application and monitoring sections. It is not clear and needs an overhaul.	Opportunity Identified
TA 5	Part I	5	Key procedural steps		Consider allowing re-application within less than 12-month period, where the CPO implemented the required actions Question on the number 10 as the required number of certificates (need tangible criteria for defining a threshold) Use more concise descriptions of the steps (bullet points, flowcharts or diagrams to visually represent the procedural steps) This can help readers quickly understand the process flow and the relationships between different steps Maintain a uniform structure for each procedural step. Start each section with a brief overview, followed by detailed steps Provide more context or examples where necessary. Explain why certain steps are important or what the implications are if they are not followed correctly. Include real-world examples or case studies to illustrate the application of these steps Include a section on common issues or FAQs that might arise during the procedural steps, along with solutions or best practices Highlight any critical compliance or legal requirements associated with each procedural step. This can prevent potential oversights that may have legal implication	Assume this is in relation to a suspension? Not sure that suspension should be included in continued recognition process. Information in relation to re-assessments,continued recognition and suspensions is spread between elegibility, application and monitoring sections. It is not clear and needs a thorough review. Would support re-entry within less than 12 months if required actions have been implemented but process needs to be clear.	Opportunity Identified
TA 5	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	"Preventative actions" is not appropriate at CPO level; keep current wording as is	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part I	5	Key procedural steps	A => Application		**FOLLOWING CLAUSE NOT INCLUDED IN CONSULTATION DOCUMENT** *In the year prior to the publication of a new version* *of the GFSI Benchmarking Requirements, no new* *application will be accepted. A notice will be displayed* *on the GFSI website to indicate the starting date of* *this one-year period.* ***Comment below in relation to clause above.*** With the requirement to apply for re-assessment within 9 months of a new GFSI version being published why does there need to be a requirement for no applications 12 months prior to a new GFSI version. If a CPO understood they would need to re-submit soon after recognition the decision whether or not to apply would be up to them. Removing this one year time limit also allows GFSI to undertake a thorough review and not be pressured to complete within 12 months. It would be benefical for GFSI to provide publically available long term plans for review timeframes to enable forward planning for CPO's to align reviews to more efficiently update CP's with new Food Safety Outcomes	Opportunity Identified
TA 5	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Steering Committee decision and communicating to the CPO	Couldn't reach consensus

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part I	5	Key procedural steps	H => Annual Monitoring of continued alignment		Twice a year, the Benchmark Leader will remotely select at least five random audits, performed by various Certification Bodies and send the Certification Programme Owner a list of objective evidence and files related to these audits to verify alignment of Part II of the GFSI Benchmarking Requirements, including but not restricted to: • Certificate and report and / or auditor notes, • Contract with the Certification Body, • Examination file of the auditor, • Scope allowance of the auditor. **Following comment in relation to the clause above not included in the consultation document.** This seems like the role of the Accreditation Body. Additionally there is a requirement for CPO's to carry out reviews as well. Why does this need to be duplicated? Gap analysis Once a year, typically in conjunction with the first random record review, the Benchmark Leader will	Opportunity Identified
TA 5	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Agree with WG comment	Agree
TA 5	Part I	6	Sanctioning	GFSI Appeals Procedure	The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.	Agree with first point There should be at least one member (preferably more) of the Appeals Committee who has expertise in practical application of the GFSI BMRs and who has knowledge specific to the scope/sector in question. This would ensure that the Committee has an understanding of the entire process.	Agree

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		There should be a published timeframe for identification of non-alignment, response (e.g. CAP) and corrective actions taken by the CPO, and sanctions.	Couldn't reach consensus
TA 5	Part I	6	Sanctioning	This recommendation is passed to the GFSI Executive Director and the GFSI Board for final decision. The GFSI Technical Manager will inform the Certification Programme Owner of this final decision, including a full explanation for it.		Revise 'Board' to 'Steering Committee'	Agree
TA 5	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		Suggested addition: The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time to prepare a stakeholder communication plan, prior to the suspension being published on the GFSI website.	Agree
TA 5	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		Suggested addition: The CPO shall be informed in writing in the case of withdrawal, prior to the withdrawal being published on the GFSI website.	Agree
TA 5	Part I	6	Sanctioning	The Certification Programme Owner has the right to appeal against any decision made by the GFSI Board, the GFSI Executive Director or any person contracted to GFSI in relation to the Benchmarking Process.		Revise 'Board' to 'Steering Committee'	Agree
TA 5	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	The 'continued recognition' process should encompass Part II and Part III assessments for GFSI recognized organizations going through the re-benchmarking process against a new version of the GFSI requirements.	Opportunity Identified
TA 5	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.		Align definition of 'ownership' with Part I definition.	Agree
TA 5	Part II	1.7	Product Labelling	The Certification Programme shall specify the use of off-product logo or mark and shall ensure that Certification Bodies communicate those rules to applicant / certified organisations.		Support the option of only 1 CB. For smaller CP's the requirement to have more than one CB can create problems. For example, one CB may have only a small number of certified operators meaning meeting minimum annual audit numbers and maintaining auditor competency can be challenging.	Misunderstood

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
TA 5	Part II	1.8	Certification Programme Development and Maintenance	The Certification Programme shall be developed and maintained with the participation of technically competent representatives of direct stakeholders, or be subjected to formal review by such parties and subsequently determined as appropriate.		1. Agree with 12 months operating as an accredited Food Safety Progamme prior to NEW GFSI applications but do not agree with 12 months implementation of the version being used for the application (see comments in Row 10 below relation to how this links with versions). 2.The WG comment relates to no minimum implementation duration of a specific version in relation to continued recognition which we support. Not being able to update a standard and have continued recognition removes the ability for continous improvement and may have detrimental impacts on Food Safety Outcomes. The process for continued recogntion in the event of a version change is unclear and overall, the differences between new applications and continued recognition processes needs to be clarified. Generally the information is dispersed across different sections and not all in one place.	Misunderstood
TA 5	Part II	1.9	Certification Programme Development and Maintenance	The number and interests of the stakeholder representatives involved with the Certification Programme development shall be reflective of the sector(s) of the food supply chain for which the Certification Programme is intended.		This clause is potentially impacting the ability for CPO's to make change and update the standard prior to and during the GFSI recognition process. Not making or delaying updates because a CPO wants to fulfill the GFSI requirement of 12 month implementation of the version being submitted impacts Food Safety Outcomes. Combine this with the up to 12 months recognition process means the CPO is not able to make changes to the standard for 2 years. This stifles the ability for change and continuous improvement at both the programme and producer level. Furthermore, if the submitted version is then recognised and the CPO wants to make changes, the continued recognition process is unclear. Also, for new applicants, working through the timing of applications in relation to the '2 -year hiatus', their own reviews and then anticipating GFSI reviews is very difficult and creates delays. This creates issues for suppliers wanting GFSI recognised standards as there is constant uncertainty as to when it will be available. This in turn is enabling supply without GFSI recognition as in some instances retailers have not choice but to accept product from a non GFSI recognised programme	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part II	1.10	Certification Programme Development and Maintenance	The Certification Programme shall be subjected to extensive stakeholder consultation during its development.		Specification for 12 month requirement is a duplication of above.	Misunderstood
TA 5	Part II	1.11	Certification Programme Development and Maintenance	The consultation period shall allow sufficient time for stakeholders to review the Certification Programme under development and send their comments to the Certification Programme Owner.		9 month timeframe for currently recognized CPO to apply for re-benchmarking is in conflict with this requirement. CPO version update processes (including stakeholder consultation) have a longer timeframe than 9 months - to draft, consult on, refine and implement changes.	Opportunity Identified
TA 5	Part II	1.12	Certification Programme Development and Maintenance	The Certification Programme Owner shall ensure due consideration to comments received from stakeholders during the consultation.		Agree needs further clarification.	Misunderstood
TA 5	Part II	1.14	Certification Programme Development and Maintenance	The Certification Programme's normative documents shall be appropriately controlled and publicly available. The documents submitted to GFSI shall be translated into English and their translation appropriately controlled.		If the requirement for a 12 month implementation of the verison being submitted were to be kept (which we do not support), this requirement needs to be more clearly linked to the 12 month implementation of the version being submittted. If a CPO were to review their programme and make change, the cannot submit for 12 months.	Misunderstood
TA 5	Part II	1.17	Certification Programme Development and Maintenance	The Certification Programme Owner shall ensure that stakeholders and other interested parties can make effective contact with the Certification Programme Owner, or authorised authority, to clarify any interpretation.		There needs to be a very clear process for continued recogniton in the event a programme is reviewed and changes are made while it is GFSI recognised. This needs to be allowed to happen freely . The continued recognition process is loose and gives no confidence that a programme can be updated and improved and recognition maintained. It seems arbitrary and doesn't seem right to have a programme that is aiming to be updated to improve Food Safety Outcomes in the same process as a programme that has been suspended. The comment above relates to the following clauses in Section 3 "Application Options" which as not been included in the consultation document. Certification Programme Owners shall apply for continued recognition if the Certification Programme in the application is: • Recognised by GFSI against the current version of the GFSI Benchmarking Requirements but will be subjected to changes which could compromise its GFSI Recognition, such as changes to its governance or ownership, its	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part II	1.23	Internal Review	The operations of the Certification Programme Owner shall be subject to formal annual internal review of its relevance and compliance to internal processes, and, where appropriate, revised.		The timeframe in relation to continued recognition when GFSI make a change should be 12 months. Also, there is no detail given in relation to the process (see comments in relation to Row 18 above). Is re-assessment the same as continued recognition? Is the process for assessment the same when GFSI updates their version as when a CPO updates a version? The whole area of re-assessments and continued recognion based on GFSI or CPO's updates is not clear. Also, information in relation to re-assessments and continued recognition is spread between elegibility, application and monitoring sections. It is not clear and needs an overhaul.	Misunderstood
TA 5	Part II	1.24	Internal Review	The Certification Programme Owner shall ensure that the formal internal review assesses the management of the Certification Programme, and address any issues or concerns raised by stakeholders.		Continued recogniton process is unclear and does not relate to re-assessment although both will address a change in CP verison. The only difference is one is instigated by CPO and one is instigated by updated GFSI version.	Misunderstood
TA 5	Part II	1.25	Internal Review	The review and any arising actions shall be fully documented.		Assume this is in relation to a suspension? Not sure that suspension should be included in continued recognition process. Information in relation to re-assessments,continued recognition and suspensions is spread between elegibility, application and monitoring sections. It is not clear and needs a thorough review. Would support re-entry within less than 12 months if required actions have been implemented but process needs to be clear.	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part II	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 / TS 22003 for management system Certification Bodies.		FOLLOWING CLAUSE NOT INCLUDED IN CONSULTATION DOCUMENT In the year prior to the publication of a new version of the GFSI Benchmarking Requirements, no new application will be accepted. A notice will be displayed on the GFSI website to indicate the starting date of this one-year period. Comment below in relation to clause above. With the requirement to apply for re-assessment within 9 months of a new GFSI version being published why does there need to be a requirement for no applications 12 months prior to a new GFSI version. If a CPO understood they would need to re-submit soon after recognition the decision whether or not to apply would be up to them. Removing this one year time limit also allows GFSI to undertake a thorough review and not be pressured to complete within 12 months. It would be benefical for GFSI to provide publically available long term plans for review timeframes to enable forward planning for CPO's to align reviews to more efficiently update CP's with new Food Safety Outcomes	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part II	2.8	Relationship with Accreditation Bodies	The Certification Programme Owner shall inform Accreditation Bodies of any relevant information and developments related to the Certification Programme.		Twice a year, the Benchmark Leader will remotely select at least five random audits, performed by various Certification Bodies and send the Certification Programme Owner a list of objective evidence and files related to these audits to verify alignment of Part II of the GFSI Benchmarking Requirements, including but not restricted to: • Certificate and report and / or auditor notes, • Contract with the Certification Body, • Examination file of the auditor, • Scope allowance of the auditor. Following comment in relation to the clause above not included in the consultation document. This seems like the role of the Accreditation Body. Additionally there is a requirement for CPO's to carry out reviews as well. Why does this need to be duplicated? Gap analysis Once a year, typically in conjunction with the first random record review, the Benchmark Leader will	Opportunity Identified
TA 5	Part II	2.9	Relationship with Accreditation Bodies	The Certification Programme Owner shall agree on their process for the extension of the scope of activities of Certification Bodies with the Accreditation Bodies.		These actions and decisions are very subjective. There is no examples of the types of issues that lead to various levels of action/sanction.	Opportunity Identified
TA 5	Part II	3.1	Relationship with Certification Bodies	The Certification Programme Owner shall have contractual and enforceable arrangements with all Certification Bodies accredited to ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003 to operate their Certification Programme.		Duplication. Accreditation requirements should not be repeated in the benchmarking requirements, since it is a GFSI requirement for CBs to be accredited.	Couldn't reach consensus
TA 5	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		There needs to be an implementation period of up to 18 months for CPOs to incorporate references into normative documents from standards that are external to the CPO. Transitioning to current versions of IAF MD4, IAF MD1, Codex, etc. cannot happen without a suitable delay. These standards are subject to review on different timeframes that will not always align with CPO update and revision processes.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus
TA 5	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Remove: "at all times" or reword (e.g., "upon request").	Couldn't reach consensus
TA 5	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Examples are too broad and need to be clarified. A serious food safety situation is an outbreak. When reporting to GFSI is required, additional requirements outlining the minimum information should be included. Also need agreed upon timeframes for reporting and for GFSI to respond back to the CPO.	Opportunity Identified
TA 5	Part II	3.8	Relationship with Certification Bodies	The Certification Programme Owner shall inform Certification Bodies of any relevant information and developments related to the Certification Programme. This shall include any changes to the Certification Programme.		It seems very insular and could be perceived as protectionism not to include other perspectives in Appeals Committee. CB's and CPO's are the eyes and ears of the programmes and are able to provide valuable input into decision making from a perspective different to industry. Actively excluding them from committees such as this creates an element of distrust.	Misunderstood

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		Remove product recalls from the list of risk factors as # of company recalls is not a metric linked to CB performance	Opportunity Identified
TA 5	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	We do not support publication of CB KPI results. This info is provided to GFSI during CPO assessments. KPIs are intended to drive or reinforce good performance to CPO's program and are intended to be used to optimized the program, drive collaboration and open communication with CBs. Since KPIs are very much driven by the CPO they are likely unique to each program with different criteria and may lead to confusion if results are published.	Couldn't reach consensus
TA 5	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus
TA 5	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus
TA 5	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree. Remove the emphasis on the specific education requirement. Having a degree in a specific field does not make a good auditor and is currently a restriction to onboard new auditors. An evaluation of the candidate's education can be included in the auditor qualifications; however, the years of industry and auditing experience, in addition to continuing education courses should be granted more value. Provide an avenue for additional training or a plan for further education vs only using higher education.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
TA 5	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	We do not support WG suggestion. Removing "quality assurance" experience will make it even harder to find auditors who meet the requirements. It's very hard to find primary ag auditors who have 2 years FT in a food safety role	Opportunity Identified
TA 5	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Need to allow for grandfathering of existing auditors and have requirements linked to the benchmarking version in effect at the time of qualification. Only new entrants need to meet current requirements.	Opportunity Identified
TA 5	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Leave the requirement as it is currently worded. For exports, the onus is on the FBO to obtain and provide to the auditor relevant information about export market requirements. Auditors cannot be expected to be familiar with the relevant laws and regulations in an unlimited number of export markets.	Agree
TA 5	Part II	4.15	Maintenance of Auditor Skills and Competence	In specific situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.		If WG proposed changes to 4.14 are accepted, then 4.15 is not needed.	Opportunity Identified
TA 5	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Leave the requirement as it is currently worded, or change to 'where the integrity of the certification could be at risk'. Having a "type" of non-conformity is not a requirement for CPO standards. Broader/more generic wording gives the CBs the flexibility they need to investigate as needed.	Agree
TA 5	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree that this is a much-needed modification.	Opportunity Identified
TA 5	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	We do not support the WG comment. The information is already required to be on the certificate.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Leave wording as is. Confidentiality would have to be preserved for all reports that are proprietary to the FBO.	Couldn't reach consensus
TA 5	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Agree with there being an indication on the certificate when the certificate is issued against a GFSI-recognized programme, as long as that identification is not the GFSI logo (too complex for CBs to manage associated branding rules). Disagree with the preferred method being an "e-solution" / database as this is more onerous to manage and would add further complexity to the system, since the certificate is issued by the certification body. Info about CPO suspension is publicly available on GFSI website.	Couldn't reach consensus
TA 5	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	Agree	Couldn't reach consensus
TA 5	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Agree	Opportunity Identified
TA 5	Part II	5.34	Use of ICT during the audit	The CPO shall specify the maximum period of time between the beginning and the end of all audit activities included in the audit duration to maintain the audit efficiency and integrity. That period of time shall not exceed 30 days.		Clarify that the 30 day timeline refers to a single audit being carried out, and does not apply to auditing the sites in a multi-site certification.	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Difficult to evaluate proposal until draft text is available for comment	Opportunity Identified
TA 5	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	Propose to add as follows: If necessary, a small number of the sample sites may be audited prior to the audit of the central function, with proper justification	Couldn't reach consensus
TA 5	Part II	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 and independent from the sites.	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 ~~and independent~~ from the sites.	Leave as is	Couldn't reach consensus
TA 5	Part II	6.16	Internal audit	Clear requirements for internal auditors and technical reviewers shall be defined, documented and reviewed by the Certification Body.	Clear requirements for internal auditors and ~~technical~~ reviewers shall be defined, documented and reviewed by the Certification Body.	Leave as is	Agree

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
TA 5	Part II	6.21	Site audit sampling	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. 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.	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. 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	Add ISO 22003-1 or ISO 22003-2 as applicable, as sampling requirements are set out in these normative accreditation documents, that are different to IAF MD1. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 5	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 5	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 5	Part II	6.24	Site audit sampling	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.	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 MD1	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements. This WG comment would render all of the CPO standards out of compliance.	Opportunity Identified
TA 5	Part II	6.25	Management of non-conformities	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.	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	Note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 5	Part II	6.26	Management of non-conformities	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.	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 MD1	Note that IAF MD1 only applies to management system certification.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part II	6.27	Management of non-conformities	If the central function, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including the central function and all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.	Define "critical Certification Programme requirements" or suggest to replace by "leading to major non conformities". Some members suggested " fundamental certification programme requirements".	Change to: fails to meet the certification programme requirements (including not addressing any NCs raised within the defined timelines)	Couldn't reach consensus
TA 5	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	In terms of a multi-site - the central function is responsible and HO terminology should not be introduced here.	Agree
TA 5	Part II	6.32	Certificates	If the multi-site organisation is allowed to sell their product outside of the group or multi-site organisation, in all cases the member sites shall be transparent about the source and scope of certification, by providing customers with a copy of the certificate as issued above.	Certificate to include detailed description of the scope as it relates to the inclusion of Head Office or not.	Already covered by another proposed revision (6.3.1)	Couldn't reach consensus
TA 5	Part III FSMS	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.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Couldn't reach consensus
TA 5	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	As with Part III HACCP comments - the term 'latest version' needs a system of change management as a change to a Codex document cannot immediately be incorporated into CPO standards. We do not support additional wording proposed by WG. This requirement is about a site's senior management commitment. The evidence of that is built into the site's processes as defined elsewhere in this benchmark; therefore, the proposed addition does not add value.	Opportunity Identified
TA 5	Part III FSMS	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.	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. *Suggest to update according to Codex:* *Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	Leave as "Specifications shall be established…" given it covers inputs and services e.g. pest control services. Specifications may be established for this but can they be linked back to scientific principles?	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	The last part of the proposed addition seems unnecessarily wordy ("to demonstrate the effective operation the Food Safety Management System.") This could be deleted without changing the intent of the requirement.	Agree
TA 5	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Applicable GFSI scopes are not identified for proposed change. We do not support the proposed addition to the B scopes. If deemed applicable to B scopes, the term 'validation' should be changed to 'verification'.	Opportunity Identified
TA 5	Part III FSMS	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.	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 - add intended consumption as well?	We do not support WG suggestion to add this wording.	Couldn't reach consensus
TA 5	Part III FSMS	27	Change Management		Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.	Redundant. Already covered by element 3 above (management review)	Couldn't reach consensus
TA 5	Part III GAP	1	Land used for production	Land used for production shall be evaluated for hazards and contamination. Control measures shall be implemented to reduce hazards to acceptable levels.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified
TA 5	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	We do not support the proposed WG addition. Documenting the rationale for which agricultural chemicals are selected is not necessary when the requirements in 14.3 and 14.6 are followed (i.e., only approved chemicals are used, and legislation and label directions are followed). Chemical use that adheres to applicable legislation is considered safe for consumers. Documenting decisions around chemical use for other reasons (e.g., environmental protection) is outside of GFSI's scope.	Agree
TA 5	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified

Org	Benchmark Part	Clause	Element title	Element content	WG Member comments	Comments	Overview
TA 5	Part III GMP	17	Stock management	A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.		This requirement does not fit for GFSI scope B3 and should be removed for that scope. Stock management of perishable fresh produce items is done for quality reasons. It does not need to be part of a food safety program. Spoiled produce is not saleable and will not be consumed.	Opportunity Identified
TA 5	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified
TA 5	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified
TA 5	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified
TA 5	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 5	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	The hazard analysis, rather than 'the hazard and risk management system' would have already considered the likelihood of occurrence and defined appropriate control measures. The intent of the additional proposed wording is not clear. If the system is effectively implemented in accordance with the HACCP Plan, when would there be an absence of control measures?	Opportunity Identified
TA 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has an agreement with one or more Accreditation Bodies for Certification Bodies to operate to ISO / IEC 17065 or ISO / IEC 17021 for the scope of their Certification or ISO / IEC 17021 for the scope of their Certification Programme.	Are there any additional references to be included?	No additional references	Agree
TA 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has contractual relationships with at least two Certification Bodies that have accreditation for the scope of their Certification Programme,	*Debate around the group about using only 1 CB being a possible threshold. However, this poses the risk of monopoly where only 1 CB is offering the programme.*	Keep 2 CBs as a minimum	Agree
TA 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner is not undergoing any significant changes,	Questioning the part: "'significant change" Suggest to refer to specific changes such as Management change or any situation potentially impacting the quality of the delivery of the GFSI recognised certification programme. Examples may include but not limited to: change of ownership, disruption of operations or key personnel involved/supporting the programme implementation. Rationale: current text is very subjective for an assessment criteria.	Delete examples since they may or may not impact the quality of the delivery of the GFSI recognized certification program and could be interpreted as the requirement itself. Requirement could be removed altogether, or we would support the addition of the following wording: "a situation potentially impacting the quality of the delivery of the GFSI recognised certification programme". A change of ownership or changes to key personnel do not automatically mean that the programme has stopped operating effectively. The changes could in fact lead to improved delivery of the programme.	Opportunity Identified
TA 6	Part I	1	Eligibility Criteria	• The Certification Programme has been operational for a minimum of 12 months prior to the date of application. During this period, certificates have been issued to a number of organisations.	*See above comment about 12 months operation requirement*	Agree with WG comments - the process for new and existing CPOs should be different.	Couldn't reach consensus
TA 6	Part I	1	Eligibility Criteria	The Applicant Certification Programme Owners are required to satisfy the below eligibility criteria:	*Suggest adding a requirement to put the benchmarking process of a given certification programme on hold where the CPO is undergoing an investigation for longer than 1 month or following an active suspension decision.*	We do not support the WG suggestion. Timeline may be beyond the CPO's control.	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part I	1	Eligibility Criteria	• The Certification Programme Owner has in place ten valid accredited certificates for each GFSI scope of recognition including in the application, including at least one valid certificate issued by each contracted Certification Body during a 12-month period prior to the date of the application.	*Suggest to apply the requirement for 12 months operation where the certification programmes has not previously undergone GFSI Benchmarking process.* *Suggest to apply no restriction on minimum duration of operation where the application is for a new version of a currently recognised programme, provided that there is sufficient records and material (audit report, valid certificates…) available to conduct the GFSI assessments as part of the GFSI Benchmarking process.*	Suggest changing the eligibility criteria for recognized programs so that GFSI can perform a continued recognition assessment of an existing GFSI recognized program (in good standing) to the new requirements prior to implementation. These continued recognition assessments should cover both Part II and Part III requirements with the goal of making the audit transition for participating facilities much more fluid. If this could occur the recognized CPOs would be able to implement the required changes, the CBs would be able to update their accreditation to the new program version, and program participants would not need to go through duplicative audits awaiting completion of the re-benchmarking process.	Opportunity Identified
TA 6	Part I	3	Application Options	Full benchmarking • Not previously undergone benchmarking by GFSI, • Been assessed previously, but the application was withdrawn without completing the benchmarking process (re-submission), • Has successfully undergone benchmarking against a previous version of the GFSI Benchmarking Requirements (re-benchmarking), • Been previously recognised by GFSI but had their recognition withdrawn.	The working group suggest to maintain GFSI scopes as they are - no change vs ISO 22003 Food Chain Categories.	Agree with WG comments - the current GFSI scopes align with ISO 22003	Agree
TA 6	Part I	3	Application Options	Continued recognition • Their application for continued recognition; • The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.		The full application process should not apply to existing recognized CPOs. Re-benchmarking could be completed within a 'continued recognition' process. For already recognized programmes, there is no need to demonstrate market demand by submitting 10 certificates per GFSI scope.	Couldn't reach consensus
TA 6	Part I	4	Methodology	Benchmark Leader	GFSI Benchmark Leader	Conflict of interest requirements to be defined and be at least 2 years, aligned with current ISO principles	Couldn't reach consensus
TA 6	Part I	4	Methodology	GFSI Executive Director	GFSI Director	They may reassign the Benchmark Leader at any time, with sufficient notification to the CPO. The current workplan of the CPO benchmarking or MCA processes shall not be negatively impacted as a result.	Couldn't reach consensus
TA 6	Part I	4	Methodology	Demonstrating alignment and Objective Evidence	If they wish to maintain their recognition status, GFSI recognised Certification Programmes shall apply for re-assessment for all their scopes of recognition against the new version of the GFSI Benchmarking Requirements within nine months of its date of publication. The GFSI Steering Committee has the authority to extend this period under special circumstances.	Suggest CPOs be given 12 months to reapply against new benchmarking requirements, to allow for effective change management within the CPO and implementation of version updates within CBs and FBOs	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part I	5	Key procedural steps		Consider allowing re-application within less than 12-month period, where the CPO implemented the required actions Question on the number 10 as the required number of certificates (need tangible criteria for defining a threshold) Use more concise descriptions of the steps (bullet points, flowcharts or diagrams to visually represent the procedural steps) This can help readers quickly understand the process flow and the relationships between different steps Maintain a uniform structure for each procedural step. Start each section with a brief overview, followed by detailed steps Provide more context or examples where necessary. Explain why certain steps are important or what the implications are if they are not followed correctly. Include real-world examples or case studies to illustrate the application of these steps Include a section on common issues or FAQs that might arise during the procedural steps, along with solutions or best practices Highlight any critical compliance or legal requirements associated with each procedural step. This can prevent potential oversights that may have legal implication	Agree with first point Remove the 10 certificate requirement	Opportunity Identified
TA 6	Part I	5	Key procedural steps	D => Corrective action planning	Use *Corrective and Preventative Actions* instead of CAP.	"Preventative actions" is not appropriate at CPO level; keep current wording as is	Agree
TA 6	Part I	5	Key procedural steps	A => Application		Proposed revision: In the year prior to publication of a new version of the GFSI benchmarking requirements, no new application will be accepted. A notice will be displayed on the GFSI website to indicate the starting date of this one-year period, and existing GFSI recognized CPOs will be informed in writing/via email	Opportunity Identified
TA 6	Part I	5	Key procedural steps	G => GFSI final recognition decision and communication		A maximum timeline should be defined between the GFSI Steering Committee decision and communicating to the CPO	Couldn't reach consensus
TA 6	Part I	6	Sanctioning	The Certification Programme Owner shall submit an appeal to the GFSI Executive Director within 30 days of the matter in dispute occurring. The appeal shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and provide a full explanation together with substantive evidence to support a thorough investigation of the appeal.	Replace reference to "days" by "working days" applicable throughout the document	Agree with WG comment	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part I	6	Sanctioning	GFSI Appeals Procedure	*The Appeals Committee should be independent of the GFSI Director and Steering Committee. Debate around adding other stakeholder representation to the panel such as Certification Program Owner community, Certification Bodies. However, GFSI being an industry lead organisation, it is fully understandable that the industry voice would prevail on these critical decisions on GFSI recognised programmes. Thus members of the group more in favour of the panel being constituted of industry representatives exclusively.*	Agree with first point There should be at least one member (preferably more) of the Appeals Committee who has expertise in practical application of the GFSI BMRs and who has knowledge specific to the scope/sector in question. This would ensure that the Committee has an understanding of the entire process.	Agree
TA 6	Part I	6	Sanctioning	Activities of the GFSI Monitoring of Continued Alignment may lead to sanctions for the Certification Programme Owner. If evidence of non-alignment against the GFSI Benchmarking Requirements is found by a Benchmark Leader during the annual assessment, the GFSI Executive Director shall be informed. The GFSI Technical Manager and the GFSI Executive Director will review this evidence and agree on next steps.		There should be a published timeframe for identification of non-alignment, response (e.g. CAP) and corrective actions taken by the CPO, and sanctions.	Couldn't reach consensus
TA 6	Part I	6	Sanctioning	This recommendation is passed to the GFSI Executive Director and the GFSI Board for final decision. The GFSI Technical Manager will inform the Certification Programme Owner of this final decision, including a full explanation for it.		Revise 'Board' to 'Steering Committee'	Agree
TA 6	Part I	6	Sanctioning	The GFSI Executive Director shall formally inform the Certification Programme Owner of the decision and period of the suspension, and any remediation conditions imposed by the GFSI Board to regain recognition status.		Suggested addition: The CPO shall be informed in writing in the case of an imposed suspension, to allow for sufficient time to prepare a stakeholder communication plan, prior to the suspension being published on the GFSI website.	Agree
TA 6	Part I	6	Sanctioning	If the GFSI Board considers that a withdrawal of recognition is required, the GFSI Executive Director shall formally inform the Certification Programme Owner of this decision.		Suggested addition: The CPO shall be informed in writing in the case of withdrawal, prior to the withdrawal being published on the GFSI website.	Agree
TA 6	Part I	6	Sanctioning	The Certification Programme Owner has the right to appeal against any decision made by the GFSI Board, the GFSI Executive Director or any person contracted to GFSI in relation to the Benchmarking Process.		Revise 'Board' to 'Steering Committee'	Agree
TA 6	Part I				**Continued recognition** This option may be considered in the following circumstances: Their application for continued recognition where changes were introduced; The significant changes introduced to the Certification Programme, including those changes that would address the cause of suspension of the GFSI recognition if applicable.	The 'continued recognition' process should encompass Part II and Part III assessments for GFSI recognized organizations going through the re-benchmarking process against a new version of the GFSI requirements.	Opportunity Identified
TA 6	Part II	1.1	Ownership	The Certification Programme Owner shall be a legal entity, or a partnership of legal entities.		Align definition of 'ownership' with Part I definition	Agree

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part II	1.11	Certification Programme Development and Maintenance	The consultation period shall allow sufficient time for stakeholders to review the Certification Programme under development and send their comments to the Certification Programme Owner.		9 month timeframe for currently recognized CPO to apply for re-benchmarking is in conflict with this requirement. CPO version update processes (including stakeholder consultation) have a longer timeframe than 9 months - to draft, consult on, refine and implement changes.	Opportunity Identified
TA 6	Part II	3.1	Relationship with Certification Bodies	The Certification Programme Owner shall have contractual and enforceable arrangements with all Certification Bodies accredited to ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003 to operate their Certification Programme.		Duplication. Accreditation requirements should not be repeated in the benchmarking requirements, since it is a GFSI requirement for CBs to be accredited.	Couldn't reach consensus
TA 6	Part II	3.1.2	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that IAF MD4 (current version) is included as a normative reference for their certification programme(s).		There needs to be an implementation period of up to 18 months for CPOs to incorporate references into normative documents from standards that are external to the CPO. Transitioning to current versions of IAF MD4, IAF MD1, Codex, etc. cannot happen without a suitable delay. These standards are subject to review on different timeframes that will not always align with CPO update and revision processes.	Couldn't reach consensus
TA 6	Part II	3.3	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that a designated Certification Body employee is responsible for the quality system's development, implementation and maintenance. This designated employee shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus
TA 6	Part II	3.5	Relationship with Certification Bodies	The Certification Programme Owner shall ensure that Certification Bodies make the following information available at all times to the Certification Programme Owner: - Evaluation procedures and certification processes in relation to the Certification Programme; - Details of complaints, appeals and disputes procedures; - A comprehensive list of all certified organisations against the scope(s) of the Certification Programme.		Remove: "at all times" or reword (e.g., "upon request").	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part II	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.	The Certification Programme Owner shall agree on appropriate actions with Certification Bodies to mitigate any serious food safety situations such as food safety recalls, food safety breakout, food safety media attention which could result in bringing the integrity of Certification Programme or GFSI into disrepute, and notify GFSI of such situation. *1. The group encouraged GFSI to reflect on tangible criteria for refining the definition of "integrity" with specific tangible examples.* *2. The group expressed the need for GFSI to share the description of the defined procedures for the handling of incidents as described in the Incident Management Glossary entry, this process should be clearly defined including what is expected of each party involved.*	Examples are too broad and need to be clarified. A serious food safety situation is an outbreak. When reporting to GFSI is required, additional requirements outlining the minimum information should be included. Also need agreed upon timeframes for reporting and for GFSI to respond back to the CPO.	Opportunity Identified
TA 6	Part II	3.13	Office Visits Office Audit	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. Risk factors may include: - 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; - product recalls; - number of relevant complaints.		Remove product recalls from the list of risk factors as # of company recalls is not a metric linked to CB performance	Opportunity Identified
TA 6	Part II	3.14	Key Performance Indicators	The Certification Programme Owner shall define and monitor Key Performance Indicators for Certification Bodies including complaints, results of desktop assessments and office visits. The Key Performance Indicators shall be communicated to and reviewed with the Certification Bodies at least once a year.	*GFSI to consider transparency on the performance monitoring of CPOs through GFSI public page and/or mandate that these are published at the CPOs public pages*	We do not support publication of CB KPI results. This info is provided to GFSI during CPO assessments. KPIs are intended to drive or reinforce good performance to CPO's program and are intended to be used to optimized the program, drive collaboration and open communication with CBs. Since KPIs are very much driven by the CPO they are likely unique to each program with different criteria and may lead to confusion if results are published.	Couldn't reach consensus
TA 6	Part II	4.1	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that all management, administrative, technical and auditing personnel meet the competence required by the Certification Bodies, the Certification Programme and the GFSI Benchmarking Requirements.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part II	4.3	Certification Body Personnel Competence	The Certification Programme Owner shall ensure that the Certification Bodies clearly document all requirements of ISO / IEC 17065 or ISO / IEC 17021-1 with ISO / TS 22003, 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 / TS 22003, and the requirements of IAF MD4.		Duplication of AB work by CPOs. Remove	Couldn't reach consensus
TA 6	Part II	4.7	Auditors' Scopes of Activity	The Certification Programme Owner shall ensure that Certification Bodies base the scopes of auditors' activities on the sectors described in table 1 and the scopes of certification defined by the Certification Programme Owner.	Suggest to allow an equivalence system: " for higher education or X years of relevant industry experience. Rationale: given the reduced number of auditors, there needs to be alternative ways to qualify and industry experience is more beneficial than just higher education. "	Agree. Remove the emphasis on the specific education requirement. Having a degree in a specific field does not make a good auditor and is currently a restriction to onboard new auditors. An evaluation of the candidate's education can be included in the auditor qualifications; however, the years of industry and auditing experience, in addition to continuing education courses should be granted more value. Provide an avenue for additional training or a plan for further education vs only using higher education.	Opportunity Identified
TA 6	Part II	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 quality assurance or food safety functions and requirements defined in table 1, column 4.	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 ~~quality assurance or~~ food safety functions and requirements defined in table 1, column 4 *(to be linked with GFSI Auditor Training and Professional Development framework - see upcoming consultation).*	We do not support WG suggestion. Removing "quality assurance" experience will make it even harder to find auditors who meet the requirements. It's very hard to find primary ag auditors who have 2 years FT in a food safety role	Opportunity Identified
TA 6	Part II	4.9	Auditors Training	The Certification Programme Owner shall ensure that the Certification Bodies appoint auditors that have the required education, as described in table 1, column 3, and Hazard Analysis and Critical Control Point (HACCP) / Hazard and Risk Assessment training course relevant to their sector of activities.		Need to allow for grandfathering of existing auditors and have requirements linked to the benchmarking version in effect at the time of qualification. Only new entrants need to meet current requirements.	Opportunity Identified
TA 6	Part II	4.13	Maintenance of auditor skills and competence	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations. The Certification Bodies shall maintain written records of all relevant training undertaken.	The Certification Programme Owner shall ensure that Certification Bodies have a structure in place so that auditors keep up to date with industry sector best practice, food safety and technological developments, have access to and are able to apply relevant laws and regulations for the country of sale of goods. The Certification Bodies shall maintain written records of all relevant training undertaken.	Leave the requirement as it is currently worded. For exports, the onus is on the FBO to obtain and provide to the auditor relevant information about export market requirements. Auditors cannot be expected to be familiar with the relevant laws and regulations in an unlimited number of export markets.	Agree
TA 6	Part II	4.15	Maintenance of Auditor Skills and Competence	In specific situations where requirement 4.14 cannot be met, the Certification Programme Owner shall ensure that Certification Bodies implement an annual programme for auditors to carry out at least five onsite audits against GFSI-approved Certification Programmes and at least one annual onsite audit against the relevant GFSI Certification Programmes.		If WG proposed changes to 4.14 are accepted, then 4.15 is not needed.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part II	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 of non-conformity within a certified organisation.	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 of non-conformity within a certified organisation. *Should be based on the type of non conformity, with a need for a re audit to be defined by the CB's internal procedure where there is a potential food safety risk.*	Leave the requirement as it is currently worded, or change to 'where the integrity of the certification could be at risk'. Having a "type" of non-conformity is not a requirement for CPO standards. Broader/more generic wording gives the CBs the flexibility they need to investigate as needed.	Agree
TA 6	Part II	5.6	Audit Programme – unannounced audit	The Certification Programme Owner shall ensure that Certification Bodies perform at a minimum: - For scopes AI, AII, BI, BII and BIII: 10% of audits unannounced per year or one audit every 4 years for each certified organisation; - For scopes C0, CI, CII, CIII, CIV, DI, E, FI, G, H, JI, K and I: one audit unannounced every 3 years for each certified organisation. For scopes FII and JII, unannounced audits may be available as an option.	*Consensus amongst the group to present a proposal to the GFSI Technical Sub Committee for this requirement to become non applicable to Primary production scopes.*	Agree that this is a much-needed modification.	Opportunity Identified
TA 6	Part II	5.7	Audit Programme – unannounced audit	Reports, certificates and grading systems shall clearly identify whether certification audits are unannounced.	Consider to mandate the information on unannounced in e-systems publicly available	We do not support the WG comment. The information is already required to be on the certificate.	Couldn't reach consensus
TA 6	Part II	5.18	Audit Reporting	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the audit report is 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.	The Certification Programme Owner shall ensure that appropriate confidentiality is in place and that the final audit report is 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.	Leave wording as is. Confidentiality would have to be preserved for all reports that are proprietary to the FBO.	Couldn't reach consensus
TA 6	Part II	5.22	Management of Certification	The Certification Programme Owner shall specify the information required on the certificate.	*Consensus from the group to have an indication on the certificate that it is issued against a GFSI recognised programme . An "e-solution" / database was preferred considering the possibility that GFSI recognition may be suspended/withdrawn for a given programme during the validity period of the certificate in question.*	Agree with there being an indication on the certificate when the certificate is issued against a GFSI-recognized programme, as long as that identification is not the GFSI logo (too complex for CBs to manage associated branding rules). Disagree with the preferred method being an "e-solution" / database as this is more onerous to manage and would add further complexity to the system, since the certificate is issued by the certification body. Info about CPO suspension is publicly available on GFSI website.	Couldn't reach consensus
TA 6	Part II	5.24	Management of Certification	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a timescale defined with the Certification Programme Owner, before certification can be awarded.	Evidence of corrections or corrective actions shall be returned, completed and verified by the Certification Bodies, within a maximum timescale defined by the Certification Programme Owner, before certification can be awarded.	Agree	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part II	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, etc.	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, etc. *Introduce definition of "incident to be reported" in the glossary.*	Agree	Opportunity Identified
TA 6	Part II	5.34	Use of ICT during the audit	The CPO shall specify the maximum period of time between the beginning and the end of all audit activities included in the audit duration to maintain the audit efficiency and integrity. That period of time shall not exceed 30 days.		Clarify that the 30 day timeline refers to a single audit being carried out, and does not apply to auditing the sites in a multi-site certification.	Couldn't reach consensus
TA 6	Part II	6	Multi-site Certification		~~However, 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. *1. Add a requirement to ensure multi-site approach is only applied where permitted* *2. Add clearer distinction on requirements applicable to Central function and multi-site certification approach to ensure that i) all the specified requirements of the Certification Programme related to the GFSI scope(s) of recognition have been evaluated during the audit ii) where a site is certified against a programme, fundamental requirements of the certification programme in question are audited on an annual basis*	Difficult to evaluate proposal until draft text is available for comment	Opportunity Identified
TA 6	Part II	6.7	General requirements	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function.	The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit of the central function. *In specific situations where requirement 6.7 cannot be met, not more than xx% of the sample sites may be audited prior to the audit of the central function, provided justified reasoning is available to be reviewed by the Certification Program Owner during CB assessments audit as part of CPO Integrity Programme.*	Propose to add as follows: If necessary, a small number of the sample sites may be audited prior to the audit of the central function, with proper justification	Couldn't reach consensus
TA 6	Part II	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 and independent from the sites.	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 ~~and independent~~ from the sites.	Leave as is	Couldn't reach consensus

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part II	6.16	Internal audit	Clear requirements for internal auditors and technical reviewers shall be defined, documented and reviewed by the Certification Body.	Clear requirements for internal auditors and ~~technical~~ reviewers shall be defined, documented and reviewed by the Certification Body.	Leave as is	Agree
TA 6	Part II	6.21	Site audit sampling	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. 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.	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. 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	Add ISO 22003-1 or ISO 22003-2 as applicable, as sampling requirements are set out in these normative accreditation documents, that are different to IAF MD1. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 6	Part II	6.22	Site audit sampling	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year.	The Certification Programme Owner shall ensure that Certification Bodies audit a sample of the sites every year as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 6	Part II	6.23	Site audit sampling	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. The sampling programme can be adjusted based on the use of monitoring technologies.	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. The sampling programme can be adjusted based on the use of monitoring technologies as per IAF MD1	And ISO 22003-1 or ISO 22003-2 as applicable. Also note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 6	Part II	6.24	Site audit sampling	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.	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 MD1	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements. This WG comment would render all of the CPO standards out of compliance.	Opportunity Identified
TA 6	Part II	6.25	Management of non-conformities	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.	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	Note that IAF MD1 only applies to management system certification.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part II	6.26	Management of non-conformities	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.	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 MD1	Note that IAF MD1 only applies to management system certification.	Opportunity Identified
TA 6	Part II	6.27	Management of non-conformities	If the central function, or any site fails to meet the critical Certification Programme requirements, then the whole organisation, including the central function and all sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.	Define "critical Certification Programme requirements" or suggest to replace by "leading to major non conformities". Some members suggested " fundamental certification programme requirements".	Change to: fails to meet the certification programme requirements (including not addressing any NCs raised within the defined timelines)	Couldn't reach consensus
TA 6	Part II	6.31	Certificates	The Certification Programme Owner shall determine the methodology for issuing certificates to the central function and the sites. A certificate shall be issued to the central function of the group or multi-site organisation. Separate certificates may only be issued to sites that were audited as part of the sample programme. Those certificates shall be clearly distinguishable from certificates that are issued to individually certified companies and shall state explicitly that the recipient is part of a certified group or multi-site organisation, and any limitations to the scope of certification shall be transparent to customers.	*Debate around issuing a certificate to HO where the audit may not have included ALL standards requirements. IF allowed, transparency on the certificate around scope of the audit. Add clarity around HO/Central function.*	In terms of a multi-site - the central function is responsible and HO terminology should not be introduced here.	Agree
TA 6	Part II	6.32	Certificates	If the multi-site organisation is allowed to sell their product outside of the group or multi-site organisation, in all cases the member sites shall be transparent about the source and scope of certification, by providing customers with a copy of the certificate as issued above.	Certificate to include detailed description of the scope as it relates to the inclusion of Head Office or not.	Already covered by another proposed revision (6.3.1)	Couldn't reach consensus
TA 6	Part II	6.28	Site audit sampling	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.	A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" related to food safety, financial or other risk categories as per the risk profile described by the site shall not be eligible for multi-site or group certification.		Couldn't reach consensus
TA 6	Part III FSMS	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.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Couldn't reach consensus
TA 6	Part III FSMS	2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include ~~elements of~~ a clear mention of food safety culture and shall be constituted of key elements as described in the latest version of the Codex Alimentarius General Principles of Food Hygiene.	As with Part III HACCP comments - the term 'latest version' needs a system of change management as a change to a Codex document cannot immediately be incorporated into CPO standards. We do not support additional wording proposed by WG. This requirement is about a site's senior management commitment. The evidence of that is built into the site's processes as defined elsewhere in this benchmark; therefore, the proposed addition does not add value.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part III FSMS	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.	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. *Suggest to update according to Codex: Specifications shall be based on sound scientific principles.* *Alternative options:* *i) Specifications shall be based on recognised scientific principles* *ii) Specifications shall be based on established scientific principles* *iii) Specifications shall be based on comprehensive scientific principles*	We do not support the WG proposal - leave the requirement as is.	Misunderstood
TA 6	Part III FSMS	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.	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 maintained as per the procedure for the control of documented information, to demonstrate the effective operation the Food Safety Management System.	The last part of the proposed addition seems unnecessarily wordy ("to demonstrate the effective operation the Food Safety Management System.") This could be deleted without changing the intent of the requirement.	Agree
TA 6	Part III FSMS	16.3	Allergen plan validation		Consider adding a clause 16.3 requirement on allergen management plan validation.	Applicable GFSI scopes are not identified for proposed change. We do not support the proposed addition to the B scopes. If deemed applicable to B scopes, the term 'validation' should be changed to 'verification'.	Opportunity Identified
TA 6	Part III FSMS	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.	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 - add intended consumption as well?	We do not support WG suggestion to add this wording.	Couldn't reach consensus
TA 6	Part III FSMS	27	Change Management		*Introduce a general requirement to have a documented procedure for change management particularly focusing on those changes with potential impacts on food safety.*	Redundant. Already covered by element 3 above (management review)	Couldn't reach consensus
TA 6	Part III GAP	1	Land used for production	Land used for production shall be evaluated for hazards and contamination. Control measures shall be implemented to reduce hazards to acceptable levels.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part III GAP	14.5	Input - Agricultural chemicals	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	Documentation of agricultural chemical applications shall be maintained. Records shall include at a minimum information on the risk assessment for the use of selected agriculture chemicals, the date of application, the chemical used, the crop sprayed, the concentration, method and frequency of application and records on harvesting to verify that the time between application and harvesting respects the required pre-harvest interval / withholding period.	We do not support the proposed WG addition. Documenting the rationale for which agricultural chemicals are selected is not necessary when the requirements in 14.3 and 14.6 are followed (i.e., only approved chemicals are used, and legislation and label directions are followed). Chemical use that adheres to applicable legislation is considered safe for consumers. Documenting decisions around chemical use for other reasons (e.g., environmental protection) is outside of GFSI's scope.	Agree
TA 6	Part III GAP	6.1	Personnel health and hygiene	Personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.	Personal hygiene standards, including health standards where applicable, shall be established, implemented and maintained to minimise food safety risks.		Opportunity Identified
TA 6	Part III GMP	1	Site environment	The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.		It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified
TA 6	Part III GMP	17	Stock management	A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.		This requirement does not fit for GFSI scope B3 and should be removed for that scope. Stock management of perishable fresh produce items is done for quality reasons. It does not need to be part of a food safety program. Spoiled produce is not saleable and will not be consumed.	Opportunity Identified
TA 6	Part III HACCP	1.1	Hazard and Risk management system	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A Hazard and Risk Management System including prerequisite programmes shall be implemented to identify and control food safety hazards, ~~including allergens~~. This system shall be systematic, comprehensive and shall take into consideration relevant law.	It is not clear in this section which GFSI scopes the element applies to - difficult to comment without that context.	Opportunity Identified
TA 6	Part III HACCP	1.1.1	Hazard and Risk management system	This may be a HACCP based system or another hazard and risk management system that covers the Annex of Codex Alimentarius General Principles of Food Hygiene.	This may be a HACCP based system or another hazard and risk management system as per the latest the version of Codex Alimentarius General Principles of Food Hygiene.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified

Stakeholder Comments and GFSI Response by Part of the BMRs

Org	*Benchmark Part*	*Clause*	*Element title*	*Element content*	*WG Member comments*	*Comments*	*Overview*
TA 6	Part III HACCP	1.1.2	Hazard and Risk management system	This shall be a HACCP system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene.	This shall be a HACCP system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified
TA 6	Part III HACCP	1.1.3	Hazard and Risk management system	This shall be a hazard and risk assessment system, based on the Annex of Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	This shall be a hazard and risk assessment system, based on the latest version of the Codex Alimentarius General Principles of Food Hygiene or other applicable internationally-recognised industry guidelines.	Changes to an external reference cannot be instantly incorporated into a standard. A transition period must be allowed (in alignment with the CPO's current version update cycle) from when the external source's update is made to when it is incorporated into the CPO's standard. A suitable transition timeframe allows for public consultation and other activities to be completed consistent with GFSI requirements.	Opportunity Identified
TA 6	Part III HACCP	1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	A hazard and risk management system shall be implemented to identify and control food safety hazards, including the likelihood of occurrence in the absence of control measures. This system shall be systematic, comprehensive and shall take into consideration relevant law.	The hazard analysis, rather than 'the hazard and risk management system' would have already considered the likelihood of occurrence and defined appropriate control measures. The intent of the additional proposed wording is not clear. If the system is effectively implemented in accordance with the HACCP Plan, when would there be an absence of control measures?	Opportunity Identified