

# GFSI Technical Advisory Note

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## Change Log

Version	Date	Description
1.0	10/11/2025	Initial publication of this Technical Advisory Note on: A. Update on Application Form Timeline B. Implementation Handbook C. Clarification on Benchmark Requirement 4.9 D. Clarification on Glossary Term – Reportable Incidents to GFSI
2.0	01/12/2025	Update of Technical Advisory Note to include: E. Sanctioning Process

## A. Update on Application Form Timeline – BMR Version 2024

The GFSI advises stakeholders that the timeline for the submission of application forms related to BMR Version 2024 has been adjusted. Applications are now being accepted up to 17 May 2026 midnight CET.

This change is intended to allow for alignment with ongoing updates to supporting materials and to ensure clarity and consistency across submissions. For any further queries, please contact [gfsinfo@theconsumergoodsforum.com](mailto:gfsinfo@theconsumergoodsforum.com).

## B. Implementation Handbook - related to BMR's v2024

The GFSI Implementation Handbook was developed in response to requests from stakeholders for additional interpretation and guidance on the application of the Benchmarking Requirements.

We acknowledge the feedback received on the first version of the Handbook and have decided to place the current document on hold. A revised version is under development and will be

published shortly.

The Benchmarking Requirements themselves remain the definitive reference for all GFSI-recognised programmes. For any further clarification on Benchmarking requirements, kindly contact [gfsinfo@theconsumergoodsforum.com](mailto:gfsinfo@theconsumergoodsforum.com).

## C. Clarification on Part II, Benchmarking Requirements 4.9

GFSI acknowledges the concerns raised by stakeholders regarding Benchmark Requirement 4.9, specifically in relation to auditor education and the interpretation of Table 1, column 3.

The intent of Requirement 4.9 is to ensure that all auditors conducting audits against GFSI-recognised programmes possess a strong and consistent technical foundation. Food safety auditing requires specialised knowledge, and clear qualification criteria are necessary to maintain confidence in the outcomes of certification.

Table 1, column 3 requires auditors to hold a degree in discipline, or, at a minimum, to have successfully completed a relevant higher education course or equivalent.

The inclusion of “or equivalent” is deliberate to provide flexibility. It is designed to acknowledge that competence can be achieved through alternative pathways, provided that the knowledge and skills attained are demonstrably equivalent to those gained through formal higher education in the relevant disciplines.

GFSI emphasises that this benchmark requirement is not intended to exclude auditors who have developed competence through professional training, industry qualifications, and relevant experience. The requirement establishes a baseline standard while allowing for recognition of equivalent knowledge and skills through appropriate evaluation by Certification Bodies in line with CPO requirements and their oversight.

## D. Clarification on Glossary Term - Reportable Incidents to GFSI

It is in the interests of all stakeholders for GFSI to ensure trust is maintained in the GFSI ecosystem. It is important for GFSI to be able to respond quickly and accurately to incidents that impact the integrity of GFSI recognised certification.

To this end GFSI requires notification by the CPO in the following cases:

- a) Where there is proven evidence of fraudulent behaviour by a Certification Body or individual auditor.
- b) Where a recall notice by regulatory authority cites confirmed illness or injury or hospitalisation or fatality for a Food Business operator that has a certificate issued against a GFSI recognised programme.

In all cases it is important that the notification is done within 2 working days. The notification in the first instance should include sufficient detail to ensure GFSI can respond appropriately to a

request for information. In the spirit of continuous improvement and as a follow-up to the immediate incident, GFSI may request further information from the CPO with the objective of ascertaining whether there are lessons that could be learnt in order to strengthen the current system. It is expected that CPOs collaborate in a full, transparent and timely manner with the process of continuous improvement where this is appropriate.

## E. Sanctioning Process

Section 6, Part I of The GFSI Benchmarking Process details the process and timelines for the GFSI sanctioning decision process. GFSI acknowledges concerns raised by Stakeholders about the lack of an independent appeals process and opportunity for right of reply by the affected CPO before a final decision is communicated to interested parties.

In response, GFSI has introduced amendments to the sanctioning process to:

- Introduce an independent appeals mechanism
- Clarify the decision-making process
- Clarify the process timelines

An updated version of the process has been inserted in the GFSI Governance Model and Rules of Procedure Version 8 November 2025. This amendment supersedes the text set out in The GFSI Benchmark Requirements v.2024, Section 6, Part I of The GFSI Benchmarking Process.