



GFSI Guidance Document Sixth Edition

Benchmarking Application Completion Guidelines

1. Introduction

The benchmarking process carried out by GFSI is the method by which food safety schemes ('schemes') are objectively compared to the defined requirements in the GFSI Guidance Document, Sixth Edition in order to determine equivalence.

The benchmarking process is described in full in *GFSI Guidance Document Part I: The Benchmarking Process* and follows the following key procedural steps:

1. Preliminary Screening and Benchmarking Application
2. Preliminary Desk Review
3. Benchmark Committee Review
4. GFSI Board Review
5. Annual Assessment
6. Continued Recognition

To be considered for benchmarking, schemes must submit the GFSI Benchmarking Application Form (available from gfsinfo@theconsumergoodsforum.com) along with a dossier of supporting information, which enables the GFSI to assess compliance against the requirements of *GFSI Guidance Document Part II: Requirements for the Management of Schemes* and the relevant section(s) of *GFSI Guidance Document Part III: Scheme Scope and Key Elements*.

There are three types of scheme application

- New schemes that have not previously undergone benchmarking by the GFSI, or been previously recognised and had their recognition withdrawn;
- Schemes that have GFSI recognition, but are seeking an extension of scope of recognition;
- Re-benchmarking of GFSI recognised schemes on the 4 year anniversary of the original recognition, or following significant change in scheme governance, or a change in the Guidance Document, or has been subject to suspension by the GFSI.

This Guideline applies to all three types of scheme application, and is intended to assist scheme owners submitting applications and GFSI appointed personnel, who are tasked with reviewing submitted applications.

2. Scheme Application Guidelines

2.1 General

These requirements apply to all three types of application.

- 2.1.1 Applications will only be accepted by the GFSI for benchmarking if submitted on the pro forma GFSI Benchmarking Application Form (available from gfsinfo@theconsumergoodsforum.com).
- 2.1.2 The application will consist of **two** documents; the completed GFSI Scheme Application Form and a dossier of supporting documentation, and it will be accompanied by a Table of Contents that cross-references the supporting documentation with its reference in the GFSI Benchmarking Application Form.
- 2.1.3 The Scheme Application Form must be completed in full, be legible, and in English.
- 2.1.4 Within the Scheme Application Form where references are made to supporting documentation provided in the dossier, the references must be submitted as **narrative text** (column headed Scheme Information) and cross-referenced to the clause within the GFSI Scheme Application Form (column headed Supporting Documentation Reference). The supporting documents within the dossier shall be expected to be clear, objective evidence of compliance with GFSI requirements.
- 2.1.5 The application must include a clear and concise description of the scheme governance and management and the requirements of the scheme's management system must be cross-referenced with *GFSI Guidance Document Part II Requirements for Management of Schemes*. Within the GFSI Scheme Application Form the evidence of compliance must be clearly provided on a clause- by-clause basis. Applicant schemes applying for scope extension shall be exempt from the completion of specific sections (see section 3).
- 2.1.6 The application must include a clause-by-clause cross-reference of the scheme's standard seeking compliance with the *GFSI Guidance Document Part III Scheme Scope and Key Elements*. This comparison shall also detail the compliance criteria and provide justification of compliance.
- 2.1.7 Within the work sheets of the Scheme Application Form, where columns headed Scheme Information and Supporting Documentation Reference are used, it is expected that all information should be provided by the scheme owner, without exception.
- 2.1.8 If, during the course of drafting the application documentation, the scheme owner identifies obvious areas of non-compliance with the Guidance Document, these must be addressed prior to submission of the scheme for benchmarking.
- 2.1.9 Although some schemes may include requirements other than those related to food safety, **only** the food safety requirements will be considered by GFSI for benchmarking. Therefore the application should clearly define those requirements to be considered by the GFSI and exclude any other requirements from the application.
- 2.1.10 The scheme owner agreement must be signed by an authorised person of appropriate seniority within the applicant scheme owner's management.
- 2.1.11 The scheme owner shall appoint a person authorised by the scheme management to liaise directly with the GFSI during the benchmarking process. The person's name and details must be incorporated on the GFSI Scheme Application Form (General Information).

- 2.1.12 The scheme owner is responsible for ensuring that the information provided with the scheme application is not in breach of express confidentiality obligations owed to third parties and is not otherwise restricted by applicable laws.
- 2.1.13 Completed GFSI Scheme Application Form and dossier must be sent to:
Claudine Musitelli
The Consumer Goods Forum
22/24 rue du Gouverneur Général Eboué
92130 Issy-les-Moulineaux
France
- 2.1.14 Two copies of all documentation must be submitted to the GFSI Executive Director in hard copy. In addition, the GFSI Scheme Application Form must be provided in electronic format, with, wherever possible, any supporting documentation in electronic format.
- 2.1.15 Enquiries relating to scheme applications or the GFSI benchmarking process should be addressed to:
Jessica Wigram
The Consumer Goods Forum
Tel: (+33) 1 82 00 95 95
Fax: (+33) 1 82 00 95 96
E-mail: gfsinfo@theconsumergoodsforum.com

3. Application Documentation

3.1 The GFSI Scheme Application Form

3.1.1 The format of the GFSI Scheme Application Form is a downloadable Excel spreadsheet with a number of worksheets. There is one GFSI Application Form, which will be used for all types of application, however dependant on the type of application, there are specific worksheets to complete.

Table 1

Work Sheet	Name of Work Sheet
1	General Information
2	Application Requirement New Scheme
3	Application Requirement Scope Extension
4	Application Requirement Re-benchmarking
5	Scheme Management
6	Food Safety Schemes- Systems
7	Key Elements AI
8	Key Elements AII
9	Key Elements B I
10	Key Elements BII
11	Key Elements C
12	Key Elements D
13	Key Elements E I
14	Key Elements EII
15	Key Elements EIII
16	Key Elements EIV
17	Key Elements L
18	Key Elements M

3.2 The Application Dossier

3.2.1 The application dossier is a document collated by the scheme owner to present to the GFSI at the same time as the GFSI Application Form. The documents within the dossier will support the application and allow the GFSI Benchmarking Committee to assess compliance with GFSI requirements.

The dossier must be developed in a logical format in line with the clause references with the GFSI Benchmarking Application Form. The dossier shall be presented with clearly defined sections in accordance with the work sheets named within the GFSI Application Form (Table 1). Within the hard copy of the dossier documents should be placed within the appropriate sections and cross referenced to the clauses within the GFSI Benchmarking Application Form. Each document will have a unique reference defined by the scheme owner and in accordance with the requirements specified in Table 2. Each document within the dossier shall be clearly labelled with the reference; the actual references shall be incorporated into the GFSI Benchmarking Application Form within the appropriate column of the work sheet (column headed Supporting Documentation Reference); there may be more than one document providing evidence of compliance with a GFSI requirement.

Table 2

Work Sheet	Name of Work Sheet	Supporting Document Reference
2	Application Requirement New Scheme	Scheme Ref./ANS/GFSI Ref./ Document No. <i>For example: Letter of support from a user organisation BRC/ANS/Part II 1.2.1 c)/1</i>
3	Application Requirement Scope Extension	Scheme Ref./ ASE/GFSI Ref./Document No.
4	Application Requirement Re-benchmarking	Scheme Ref./AR/GFSI Ref./Document No.
5	Scheme Management	Scheme Ref./SM/GFSI Ref./Document No.
6	Food Safety Management Systems	Scheme Ref./FSMS/GFSI Ref./ Document No.
7- 16	Key Element	Scheme Ref/KE No./ GFSI Ref./ Document No.

4. GFSI Application Form Completion

4.1 General

The completion of the GFSI Application Form will be dependent upon the type of recognition sought, namely a new scheme, a scheme seeking an extension of scope or re-benchmarking.

4.2 New Scheme Application

Applications in relation to a new scheme (*reference GFSI Guidance Document V6 Part II, section 1.1*) shall complete the following sections of the GFSI Application Form:

Work Sheet	Name of Work Sheet
1	General Information
2	Application Req New Scheme
5	Scheme Management
6	Food Safety Schemes- Systems
7- 16	One or more worksheets in relation to the scope(s) of recognition specified in the application (General Information)

4.3 Extension of Scope of Recognition

Applications in relation to a scheme seeking an extension of scope(s) of recognition (*reference GFSI Guidance Document V6 Part II, section 1.1*) shall complete the following sections of the GFSI Application Form:

Work Sheet	Name of Work Sheet
1	General Information
3	Application Req Scope Extension
5	Scheme Management
7- 16	One or more worksheets in relation to the scope(s) of recognition specified in the application (General Information)

4.4 Re-benchmarking

Applications in relation to a scheme seeking re-benchmarking (*reference GFSI Guidance Document V6 Part II, section 1.1*) shall complete the following sections of the GFSI Application Form:

Work Sheet	Name of Work Sheet
1	General Information
4	Application Req Re-benchmarking
5	Scheme Management
6	Food Safety Schemes- Systems
7- 16	One or more worksheets in relation to the scope(s) of recognition specified in the application (General Information)

5. GFSI Application Form Completion - Specific Guidance

5.1 General

The scheme owner must provide documented evidence to meet the requirements listed in *GFSI Guidance Document Part II, Section 3: Requirements for Management of Schemes*. Evidence must be provided on the Scheme Application Form and supplemented by supporting information. The following summarises the information required to assist with the completion of Scheme Management and Food Safety Schemes – Systems worksheets.

5.2 Scheme Management

5.2.1 **Part II Scheme Governance (2.4) & Scheme Management (2.5)** Evidence of the legal entity(ies) (government and/or non-government) that own and manage the scheme, including

- a. The constitution (*Part II, 2.4.1, 2.4.2*)
- b. Governance policy (*Part II, 2.4.1, 2.4.2*)
- c. Organisational structure with specific responsibilities (*Part II, 2.4.1, 2.4.2, 2.5.1*)
- d. Personnel roles and job descriptions (*Part II, 2.4.1, 2.4.2, 2.5.1*)
- e. Operating procedures (*Part II, 2.5.2*)
- f. Internal audit programme against GFSI requirements, including reviews of the scheme operation, and corrective action procedure to address non-conformities (*Part II, 2.5.3*)
- g. Where applicable, delegation of operational management to a competent authority (*Part II, 2.5.1*)
- h. Standard setting procedure and a conformity assessment programme (*Part II, 2.4.1, 2.4.2*)
- i. A procedure for dealing with complaints, including requirements for complaint investigation, complaint management documentation, and corrective action (*Part II, 2.5.9*)
- j. Evidence of liability coverage for its activities (*Part II, 2.4.4*)

The scheme's organisational structure shall name individuals on Boards, committees and in management roles and this shall be publicly available, open and transparent (*Part II, 2.4.1, 2.4.2, and 2.4.5*)

5.2.2 **Part II Scheme Development and Maintenance (2.3)**. Full documentation of the process by which the scheme was developed and is maintained by technically competent stakeholders, and is formally reviewed by key stakeholders, including:

- a. For each scope of recognition, the number and interests of stakeholder representatives involved with the scheme development (*Part II, 2.3.2*)
- b. Evidence of stakeholder consultation in the development process, including stakeholder comments. (*Part II 2.3.3*)
- c. A formal annual review process that involves key stakeholders and reviews scheme management, the currency of the standard, stakeholder concerns and documents any actions arising. (*Part II 2.3.7, 2.3.8*)

5.2.3 **Normative Documents**. The scheme's normative documents must be available in English, and evidence must be provided of protocols for control of normative documents including:

- a. The standard must be a normative document (*part II, 2.3.4*)
- b. Adequate controls for the translation and publication of normative documents (*Part II, 2.3.5, 2.5.7*)
- b. A mechanism to enable stakeholders and other interested parties to make effective contact with the scheme owner to clarify any interpretation. (*Part II 2.3.6*)
- c. A procedure to notify GFSI (through the GFSI Executive Director) of any changes to the standard or other defined normative documents. (*Part II 2.3.7*)

- d. The procedure by which the normative documents will be reviewed, revised, and re-issued at least every four years, or as appropriate, in accordance with the revision of or significant changes to the GFSI Guidance Document requirements. *(Part II 2.3.8)*
- e. Evidence of ownership of copyright (where applicable) by the legal entity on any normative documents, and systems in place to minimise the risk of any copyright breach *(Part II, 2.4.11)*

5.2.4 **Part II Scheme Governance (2.4) conflict of interest.** Evidence of procedure(s) to prevent and/or manage conflict of interest including:

- a. Procedure(s) to ensure that no employee or committee member has a conflict of interest that might influence certification decisions *(Part II, 2.4.10)*
- b. Procedure(s) to ensure that no employee or committee member has an association with Accreditation Bodies, associated Certification Bodies; or GFSI *(Part II, 2.4.9)*
- c. Procedure(s) to avoid cross-promotion in the certification process *(Part II, 2.4.7)*

5.2.5 **Part II GFSI Relationship (2.6).** Evidence of how the scheme owner will maintain communication with GFSI, including:

- a. Willingness to sign and remain in compliance with the GFSI memorandum of understanding, renewable on an annual basis *(Part II, 2.6.1)*
- b. Willingness and resources to actively participate and co-operate in GFSI activities relating to certification and accreditation *(Part II, 2.6.2)*
- c. Protocols to actively promote GFSI *(Part II, 2.6.2)*
- d. Procedures for notifying GFSI in a timely manner of any significant change in ownership, management personnel, management structure, or constitution *(Part II, 2.6.3)*
- e. Procedure to provide GFSI with an annual report of scheme activity in accordance with GFSI requirements *(Part II, 2.6.4)*
- f. Recognition that claims regarding GFSI recognition are only made for scopes and standards for which GFSI recognition has been granted *(Part II, 2.6.6)*
- g. Recognition that the scheme owner cannot allow products produced under the conforming scheme to be labelled, marked or described in a manner, which implies that it meets specific food safety criteria *(Part II, 2.6.7)*
- h. Recognition that the scheme owner cannot use its recognition by GFSI in such a manner as to bring GFSI into disrepute, nor make any statements regarding its conforming status that GFSI may consider misleading or unauthorised *(Part II, 2.6.8)*

5.3 Food Safety Schemes-Systems Section

5.3.1 **Scheme Standard.** Evidence that the scheme consists of a standard which is based on the principles of ISO/IEC Guide 65 or ISO /IEC 17021:2006, has a clearly defined scope of activity commensurate to the GFSI scope(s) of recognition and the standard and system clearly specifies compliance obligations for users. This includes:

- a. Documented evidence of how the scheme satisfies the food safety requirements of one or more of the defined GFSI defined industry scopes outlined in *Part II 2.2, and Part II Annex 1.*
- b. A clause-by-clause cross reference of the Food Safety Management Requirements in the scheme's standard against the clauses listed in Table I, and Tables II to IV that are relevant to the GFSI scope of recognition for which the scheme is applying. *(Part III)*
- c. A clause-by-clause cross reference of the Good Agricultural/Manufacturing Requirements in the scheme's standard against the clauses listed in Tables V1 to XI that are relevant to the GFSI scope of recognition for which the scheme is applying. *(Part III)*
- d. A clause-by-clause cross reference of the HACCP Requirements in the scheme's standard against the clauses listed in Tables XII to XIV that are relevant to the GFSI scope of recognition for which the scheme is applying. *(Part III)*

- c. The clause by clause comparisons (2.2.4 b–d) must detail the compliance criteria and provide justification of compliance.

5.3.2 **Accreditation Bodies.** Documented arrangements with Accreditation Bodies that are members of the International Accreditation Forum (IAF) and are signatories to the Multilateral Recognition Arrangement (MLA).that include:

- a. Compliance with the GFSI Requirements for the Application of ISO /IEC 17011:2004 – Conformity assessment – General requirements for accreditation bodies accrediting conformity assessment bodies (*Part II 3.2.1 and Annex 2*)
- b. A formally appointed point of contact with the contracted Accreditation Body(ies) (*Part II, 3.2.1*)
- c. A procedure to ensure that the accreditation standard(s) used by all Accreditation Bodies for the scope of their scheme is consistent (*Part II, 3.3.2*)
- d. A procedure to ensure that, in the event that a Certification Body has it's accreditation withdrawn or suspended, the scheme owner is informed of this action and the circumstances involved by the Accreditation Body(*Part II, 3.2.2*)

5.3.3 **Certification Bodies.** Procedures for managing Certification Bodies operating within the scope of the scheme, including:

- a. Allowance for the open, non-discriminatory application by any Certification Body to offer certification within the requirements of the scheme (*Part II, 2.4.6*)
- b. Certification Bodies comply with the GFSI Guidance Document (*Part II, 2.5.5*);
- c. The scheme owner has contractual and enforceable arrangements with all Certification Bodies that are approved to operate their scheme (*Part II, 3.3.1*)
- d. Certification Bodies are accredited only by Accreditation Bodies that are member of the International Accreditation Forum (IAF), and to the scope of an appropriate accreditation standard; i.e. ISO/IEC Guide 65 or ISO/IEC 17021:2006 (*Part II, 2.5.5, 3.3.2*);
- e. Certification Bodies that are seeking accreditation for the scope of a scheme are accredited within one year from the date of application to an Accreditation Body (*Part II, 3.3.7*)
- f. All activities resulting in the issuing of certificates are delivered by appropriately accredited Certification Bodies only (*Part II, 3.3.3*)
- g. The scope of accreditation of a Certification Body is precisely defined in terms of the category of application reference (e.g. product categories or services) of the conforming food safety scheme, including revision numbers and/or dates, and is publicly available (*Part II, 3.3.4*)
- h. The limits and scope of the accreditation are clearly communicated by Certification Bodies to clients and publicly available. Certification services that are outside the scope of the accreditation are distinguished from those that are accredited. (*Part II, 3.3.6*)
- i. Certification Bodies have a documented, effective and fully implemented quality system in place (*Part II, 3.3.13.1 and 2*)
- j. Certification Bodies have systems in place to ensure that auditors conducting assessments have qualifications, work experience, formal auditor training, initial training, audit experience and personal attributes, commensurate with *clause 3.4 of Part II of the Guidance Document* and the requirements of the scheme.
- k. Certification Bodies maintain records regarding the qualifications, training and experience of all staff involved in the certification process, including management, administrative, and technical personnel (*Part II, 3.3.13.7*)
- l. A system of key performance measures is applied to all Certification Bodies operating within the scheme, (*Part II, 2.5.6*)
- m. There is in place a risk based programme of office audits and announced, but unscheduled audits of certified organisations (*Part II, 2.5.6*)

- n. There is in place a documented system for sanctions against non-compliant Certification Bodies (*Part II, 2.5.8*)
- o. Certification Bodies notify the scheme owner of changes in ownership, management personnel, and management structure in a timely manner (*Part II, 3.3.10*)
- p. Certification Bodies notify the scheme owner of any withdrawal or suspension of certification of a supplier (*Part II, 3.3.11*)
- q. Certification Bodies have in place agreements with certified organisations to ensure that they are informed of any food safety prosecution, significant regulatory food safety non-conformity or any product recall relating to food safety and that the Certification Bodies have procedures in place to ensure the integrity of certification after notification (*Part II, 3.3.12*)
- r. Certification Body personnel engaged in the certification process sign a contract or agreement that includes requirements for confidentiality, independence from commercial or personal interests, and avoidance of conflict of interest (*Part II, 3.3.13.6*)

5.3.4 **Auditor competence.** Evidence of the systems in place to register and manage food safety auditors who are employed by accredited Certification Bodies to audit the scheme's standard, including:

- a. a risk based system of auditor competence assessment (*Part II, 3.3.9, 3.4*)
- b. Requirements for Certification Bodies to have employment procedures in place to ensure the competence of all management, administrative, technical, and auditing personnel involved in operating the scheme (*Part III, 3.4.1*)
- c. Requirements for Certification Bodies to have systems in place to ensure that auditors conducting assessments have qualifications, work experience, formal auditor training, initial training, audit experience and personal attributes, commensurate with section 3.4 of Part II of the Guidance Document and the requirements of the scheme. (*refer also 2.2.6 j of this document*)

5.3.5 **Audit and certification management.** Evidence of defined requirements for audit frequency, audit duration, audit reporting, management of certification, and data management and for ensuring that contracted Certification Bodies comply with defined requirements, including:

- a. A clearly defined and documented audit frequency programme which defines the frequency of audit for each product category covered by the scope of the scheme, ensures a minimum audit frequency of one audit per year of an organisation's facility, and has the scope to assess all elements of the scheme's standard. (*Part II, 3.5.1*)
- b. A requirement for the Certification Bodies to undertake additional surveillance audits in the event that there is evidence of non-conformity within an organisation (*Part II, 3.5.2*)
- c. Defined limits on the flexibility of audit frequency to allow effective auditing of seasonal products (*Part II, 3.5.3*)
- d. Clearly defined expectations for the duration of audits and the rationale for the determination of the duration of the audit. It is expected that the duration of an on-site audit to be typically 2 days for the manufacture of processed products and 1 day for primary production (*Part II, 3.5.4*)
- e. Requirements for audit reporting including scoring/ranking, incorporation of audit duration, compliance/non-compliance guidance, and confidentiality (*Part II, 3.6*)
- f. Clearly defined system for technical review of audit reports, and for granting, suspension and withdrawal of certification, and managing corrective actions (*Part II, 3.7.2, 3.7.3*)
- g. A clearly defined and publicly available appeals procedure (*Part II, 3.7.4*)
- h. A certificate template which specifies the information required to be included on a certificate (*Part II, 3.7.5*)
- i. A clearly defined data management system which holds and maintains data for the effective management and operation of the scheme, and incorporates data in relation to the requirements of the GFSI Guidance Document. (*Part II, 3.8.1, 3.8.2*)