

PART I



Benchmarking Process

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THE BENCHMARKING PROCESS

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Introduction

This section is the first part of the Guidance Document, which has been developed and published by the Global Food Safety Initiative (GFSI) to specify the requirements for the recognition of food safety schemes.

The objectives of Part I are to define:

- ▶ the requirements for the key steps in the GFSI benchmarking process,
- ▶ the requirements for selection for the GFSI Benchmark Committee members,
- ▶ the systems and procedures relating to the GFSI benchmarking process.

GFSI shall ensure that the process of GFSI benchmarking and associated procedures is transparent and open to stakeholder scrutiny. The systems and procedures associated with the GFSI benchmarking process will be reviewed, maintained and updated to ensure consistency and integrity.

1. The Benchmarking Process

1.1 Introduction

The benchmarking process carried out by GFSI is the method by which a food safety scheme is objectively compared to defined requirements as laid down in the GFSI Guidance Document to determine equivalence.

The comparison is carried out by a Committee of food safety experts appointed by the GFSI Board in order to ascertain whether a scheme can demonstrate conformity with the requirements of the GFSI Guidance Document. This committee will, following the review, make recommendations to the GFSI Board for recognition or non-recognition of the food safety scheme. The review is carried out in a systematic manner, in accordance with the process defined within this document.

The detailed steps, systems and procedures developed by GFSI serve to demonstrate that the GFSI benchmarking process is carried out in an independent, impartial and transparent manner by technically competent food safety experts.

The review is undertaken by directly comparing the applicant scheme requirements (the scheme standard and its supporting systems) with the requirements specified within *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*.

1.2 The Key Procedural Steps

The benchmarking process shall be carried out in accordance with 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**

The scheme owner may withdraw the application at any stage during the benchmarking process, but this must be confirmed in writing to the GFSI Executive Director.

Throughout the benchmarking process the confidentiality of information shall be respected by both GFSI (and representatives appointed by GFSI) and the scheme owner.

1.2.1 Preliminary Screening and Benchmarking Application

The objective of the preliminary screening is to ensure the criteria specified in the GFSI Guidance Document are reviewed and checked for completeness before progressing with the application for benchmarking.

The benchmarking application ensures that the scheme owner has provided all relevant information to GFSI to allow an effective assessment to be undertaken.

The applicant scheme shall provide a dossier of information to confirm compliance with the criteria specified in the GFSI Benchmarking Application (available from the secretariat upon request). The dossier shall be detailed and complete. The scheme owner will clearly define, in their application, the scope of recognition sought and may include one or more scopes within one application, as long as all the necessary information is provided to assess against each scope.

The dossier submitted by the scheme owner shall include a series of documents allowing GFSI to carry out an assessment 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 (Reference Annex 1 - Scheme Application Guidelines)*. In the case of an application for an extension to scope, it will be necessary to submit only the documentation relating to *GFSI Guidance Document Part III Scheme Scope and Key Elements*.

The scheme owner shall ensure that the provision of information is not in breach of express confidentiality obligations owed to third parties and is not otherwise restricted by applicable laws.

The application documentation shall be submitted in the GFSI specified format and will include:

(a) A summary of the food safety scheme, its objectives, details of its development and the operating procedures required for the certification system,

(b) A clause by clause cross-reference of the scheme's standard, which is seeking compliance with the *GFSI Guidance Document Part III Scheme Scope and Key Elements*. This clause by clause comparison shall also detail the compliance criteria and provide the evidence necessary to justify compliance,

(c) The requirements of the food safety scheme's management system must be cross-referenced with *GFSI Guidance Document Part II Requirements for the Management of Schemes*.

In the case of an application for an extension to scope it will be necessary to submit only the documentation relating to *GFSI Guidance Document Part III Scheme Scope and Key Elements*.

The GFSI shall provide proforma / template documentation to the scheme owner to assist with the preparation of the application dossier upon request.

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. The application shall be forwarded to the GFSI Executive Director, who will ensure the application is fully reviewed to assess its acceptability to progress to the benchmarking process. The GFSI Executive Director may request any further information from the scheme owner in support of the application.

1.2.1.1 Methodology – Preliminary Screening and Benchmarking Application (New Scheme)

The requirements specified within this clause shall apply to schemes, which have:

- ▶ not previously undergone benchmarking by the GFSI,
- ▶ been previously recognised by the GFSI, but have had their recognition withdrawn.

The GFSI Executive Director shall appoint a GFSI Benchmark Committee Leader for the scheme application and confirm a benchmark programme in accordance with the procedures specified in Annex 2 - GFSI Benchmark Committee Terms of Reference.

The GFSI Executive Director shall then transfer all appropriate paperwork to the GFSI Benchmark Committee Leader.

Once the GFSI Executive Director accepts the scheme for benchmarking, the benchmarking process will only progress when an Agreement or Memorandum of Understanding has been signed between the applicant scheme owner and GFSI (available from the GFSI secretariat upon request).

Confirmation of this acceptance shall be published on the GFSI website and the benchmarking process will begin.

In the event the scheme does not meet the requirements and is, therefore, not accepted for the benchmarking process, the scheme owner shall inform the GFSI Executive Director of their intention to resubmit the application dossier within a given timescale, or not to continue with the application.

An applicant scheme owner shall be permitted to lodge one application with the GFSI per year, but shall only be permitted to submit one re-submission within a twelve month period, if the initial application is unsuccessful.

1.2.1.2 Methodology – Benchmarking Application (Extensions to scope of recognition)

The requirements specified within this clause shall apply to schemes, which:

- ▶ are applying for a new scope of recognition,
- ▶ are seeking a change in extension within an existing recognised scope, which does not represent a significant change to the scheme governance or ownership, the management system or key elements.

The GFSI Executive Director shall appoint a GFSI Benchmark Committee Leader for the scheme application and confirm a benchmark programme in accordance with the procedures specified in *Annex 2 - GFSI Benchmark Committee Terms of Reference*.

The GFSI Executive Director shall check the information provided in the application dossier (available from the GFSI secretariat upon request) to establish if the requirements specified in the GFSI Guidance Document are complete. The GFSI Executive Director shall then transfer all appropriate paperwork to the GFSI Benchmark Committee Leader.

The GFSI Executive Director shall confirm the acceptance of the application for an extension to scope of recognition to the scheme owner and issue a new Agreement or Memorandum of Understanding. Upon signature, the GFSI Executive Director shall ensure that confirmation of this acceptance is published on the GFSI website.

A scheme shall only be permitted to lodge an application for scope extension if there is existing recognition by GFSI for a specified scope of recognition.

An applicant scheme owner shall be permitted to lodge one application for a specific scope of recognition with GFSI per year (the Initial Application) with an opportunity for one re-submission for that scope of recognition within a twelve month period from the date of the initial application, if the initial application is unsuccessful.

1.2.1.3 Methodology – Benchmarking Application (Re-benchmarking)

The requirements specified within this section of the GFSI Guidance Document shall apply to schemes, which have previously undergone benchmarking by GFSI and have been successful in their application, but:

- ▶ have had significant change to the scheme governance or ownership, the management system or key elements, or...
- ▶ a scheme will anyway be benchmarked on the 4 year anniversary of its original recognition, or...
- ▶ there has been a change in the Guidance Document within the four year revision cycle, or...
- ▶ there has been a suspension of recognition by GFSI

The GFSI Executive Director shall check the information provided in the application dossier (available from the GFSI secretariat upon request) to establish if the requirements specified in the GFSI Guidance Document are complete. The GFSI Executive Director shall appoint the Benchmark Leader and then transfer all appropriate paperwork to the GFSI Benchmark Committee Leader.

The GFSI Executive Director shall confirm the acceptance of the application for an extension to scope of recognition to the scheme owner and issue a new Agreement or Memorandum of Understanding. Upon signature, the GFSI Executive Director shall ensure that confirmation of this acceptance is published on the GFSI website.

1.2.2 Desk Review

The objective of the desk review is to assess the submissions made by the scheme owner in relation to the requirements specified within *GFSI Guidance Document Part II Requirements for the Management of Schemes* and the appropriate sections of *GFSI Guidance Document Part III Scheme Scope and Key Elements*.

The GFSI Executive Director will appoint a GFSI Benchmark Committee Leader to manage this process in accordance with the procedures specified in Annex 2 of this document.

The GFSI Executive Director will also nominate, with the agreement of the GFSI Board of Directors, a Board member who will be assigned to the scheme application. This Board member shall be kept informed of all activities by the GFSI Benchmark Committee Leader.

The GFSI Benchmark Committee Leader shall be provided with all the scheme application documentation and any supporting documentation, allowing a detailed desk review to be undertaken.

During the Desk Review, the GFSI Benchmark Committee Leader will be looking for demonstrable evidence of compliance with the GFSI requirements from the information submitted by the scheme owner. The GFSI Benchmark Committee Leader shall use his / her expertise, experience and knowledge to ascertain compliance or non-compliance.

If there is any doubt about compliance, or if insufficient or inappropriate information is provided, the GFSI Benchmark Committee Leader will liaise with the scheme owner to establish if further evidence of compliance can be submitted. Throughout this process full documentation shall be in place to record all communication and any documentation submitted to the GFSI Benchmark Committee Leader.

1.2.2.1 Methodology – Desk Review

The appointed GFSI Benchmark Committee Leader will review the information provided by the scheme owner to establish if the requirements specified in *GFSI Guidance Document Parts II and III* are in place. The GFSI Benchmark Committee Leader will look for demonstrable evidence of compliance with the GFSI requirements from the information submitted by the scheme owner. The GFSI Benchmark Committee Leader shall use his / her expertise, experience and knowledge to ascertain compliance or non-compliance with each requirement.

During the desk review the GFSI Benchmark Committee Leader will document all information in an Assessment Matrix and will record and retain all supporting documentation.

During this review the GFSI Benchmark Committee Leader may request any further information that may be required to carry out effective benchmarking of the scheme. The scheme owner shall cooperate fully with the GFSI Benchmark Committee Leader and make documentation or other evidence requested available in a timely manner.

The GFSI Benchmark Committee Leader shall decide upon the completeness of the Assessment Matrix and any supporting documentation before issuing this documentation to the Benchmark Committee.

The GFSI Benchmark Committee Leader shall provide the scheme owner and all members of the Benchmark Committee with the completed Assessment Matrix and all supporting documentation or other evidence for detailed review.

If, for any reason, the Assessment Matrix cannot be completed to the satisfaction of the GFSI Benchmark Committee Leader within agreed programme timescales, the GFSI Benchmark Committee Leader shall make the GFSI Executive Director aware of the situation and the GFSI Executive Director shall decide upon any necessary action.

1.2.3 Benchmark Committee Review

The Benchmark Committee review will objectively compare the applicant scheme requirements against the defined requirements laid down in the GFSI Guidance Document and prepare recommendations for recognition or non-recognition.

The membership of the Benchmark Committee, including the GFSI Benchmark Committee Leader, shall be drawn from a cohort of technically competent personnel or external experts. This cohort shall have undergone selection and appointment by GFSI in accordance with the procedures specified in Section 2 and Annex 2 of this document.

In the event that a suitable Benchmark Committee cannot be formed, the GFSI Executive Director shall inform the GFSI Board who shall, in turn, decide on any further action.

The benchmarking process will be carried out in accordance with the Terms of Reference of the *GFSI Benchmark Committee (Annex 2 - GFSI Benchmark Committee Terms of Reference)*.

1.2.3.1 Methodology – Benchmark Committee Assessment

The GFSI Benchmark Committee Leader shall co-ordinate the activities of the Benchmark Committee.

The members of the GFSI Benchmark Committee shall review the completed Assessment Matrix and supporting documentation provided by the GFSI Benchmark Committee Leader and will use their expertise to individually critically assess this information and make a judgement on compliance or non-compliance against each requirement. The members shall, wherever it is felt necessary, challenge or question the judgement of the GFSI Benchmark Committee Leader and may request more evidence of compliance. All comments and observations of Benchmark Committee members shall be made to the GFSI Benchmark Committee Leader, who will, in turn, record these comments and inform other Benchmark Committee members and the scheme owner.

During this process the GFSI Benchmark Committee Leader shall take any actions necessary to facilitate close cooperation and understanding between the Benchmark Committee members and the scheme owner.

The GFSI Benchmark Committee Leader shall convene a meeting of the Benchmark Committee and the scheme owner representatives whenever direct discussion is deemed necessary to clarify comments and information. Observations from the members of the Benchmark Committee and the scheme owner's representatives shall be collated and made available for meetings between the Benchmark Committee and the scheme owner.

Following the direct or electronic exchange of information and comments, a report shall be drafted by the GFSI Benchmark Committee Leader to be used for stakeholder consultation. The decision to proceed to stakeholder consultation is taken by the GFSI Benchmark Committee Leader. However, before releasing the report to the GFSI Executive Director, the scheme owner shall be provided with a copy of the report and consulted to ensure that they are in agreement that the report is accurate and a true reflection of the process undertaken. The report shall not be provided to the GFSI Executive Director until agreement to release has been confirmed by the scheme owner.

If, for any reason, the report cannot be completed to the satisfaction of the GFSI Benchmark Committee Leader within agreed programme timescales, the GFSI Benchmark Committee Leader shall make the GFSI Executive Director aware of the situation and the GFSI Executive Director shall decide upon any necessary action.

The GFSI Executive Director shall publish the report for stakeholder consultation on the GFSI website for the agreed period. The timescales for the benchmarking process can be found within Tables 1 and 2 of Part 1 of this document.

The GFSI Benchmark Committee Leader shall fully brief the nominated Board member of the content of the report and provide the Board member with all relevant documentation.

Any comments, observations or objections made by stakeholders about the report will be collated by the GFSI Benchmark Committee Leader and put forward for consideration to the Benchmark Committee

members, either electronically or directly in a meeting. The GFSI Benchmark Committee Leader shall ensure that those stakeholders who submit comments during the stakeholder consultation receive feedback from the Benchmark Committee.

Following stakeholder consultation the Benchmark Committee shall review comments received and the GFSI Benchmark Committee Leader shall draft a final report, which will include a recommendation of recognition or non-recognition.

The decision of the GFSI Benchmark Committee to recommend the recognition or non-recognition of a scheme shall be based on consensus. If consensus cannot be reached, then a vote shall be held to determine the recommendation for the recognition or non-recognition of the applicant scheme. In the event that a vote is necessary a two thirds majority shall be required in support of a recommendation for recognition.

The GFSI Benchmark Committee Leader shall ensure that all members of the Benchmark Committee receive a copy of the report prior to sending the report to the GFSI Executive Director.

In the event that any member of the Benchmark Committee deems it necessary to recommend non-recognition and cannot agree with the majority vote, the reasons for the Benchmark Committee member's rejection shall be included in the final report to the GFSI Board.

The GFSI Benchmark Committee Leader shall fully brief the nominated Board member about the content of the final report and provide the Board member with all relevant documentation prior to the Board meeting.

1.2.4 GFSI Board Review

The objective of the GFSI Board review is to decide upon the recognition or non-recognition of applicant schemes, based on the recommendations of the Benchmark Committee.

The decision of the GFSI Board to recognise a scheme shall be based on consensus. If a vote is necessary, the votes of the majority of a quorum of the GFSI Board shall determine the decision.

1.2.4.1 Methodology – GFSI Board Review

The final report and recommendation for recognition or non-recognition of the scheme shall be presented to the GFSI Board by the GFSI Executive Director.

The GFSI Board shall make the decision concerning the recognition or non-recognition of a scheme at a meeting convened for that purpose, or at a GFSI Board meeting. The GFSI Benchmark Committee Leader shall be available at this meeting, at the request of the GFSI Board.

The meeting, in this case, may take the form of a conference call and if voting is required to make a decision during the conference call, this shall be carried out via e-mail, immediately after the closure of the meeting.

The GFSI Board shall consider the recommendation made by the Benchmark Committee and raise any issues that they may have. It is expected that the GFSI Board shall make a decision at the meeting. However, if further information is required, the GFSI Benchmark Committee Leader shall be instructed to ensure that clarifications are provided.

The decision of the GFSI Board to recognise or not recognise a scheme shall be based on consensus. If consensus cannot be reached, then a vote may be held to determine the decision for recognition or non-recognition of the applicant scheme. In the event that a vote is required to reach a decision, a two thirds majority of a quorum of the GFSI Board shall be required in support of recognition. The vote shall be carried out in accordance with the GFSI Foundation Articles of Association.

The GFSI Board decision shall be communicated in writing to the scheme owner by the GFSI Executive Director, as soon as practicable after the GFSI Board decision.

In the event of recognition by the GFSI Board, the GFSI Executive Director shall prepare press notices confirming this decision with the co-operation of the scheme owner. The scheme owner shall also be expected to issue a comparable press release and the time of issue of these press releases shall be agreed by the GFSI Executive Director and the scheme owner.

The GFSI Executive Director shall publish confirmation of the recognition of the scheme on the GFSI website (Conformance Statement). The GFSI website will include a current schedule of all recognised schemes, clearly defining their scope of recognition and expected date for re-benchmarking.

In the event that the decision of the GFSI Board is non-recognition, the reasons for the Board decision shall be clearly documented and the GFSI Executive Director shall make the scheme owner aware of the reasons for the decision. The scheme owner shall have the right of appeal against the GFSI Board decision and the appeal shall be undertaken in accordance with the procedures specified in section 1.2.11 of this document.

Upon the decision of the GFSI Board, the Benchmark Committee for the applicant scheme shall be disbanded.

1.2.5 Annual Assessment

The objective of the GFSI annual assessment of GFSI recognised schemes is to assess the continued compliance of the schemes with the GFSI Guidance Document and to maintain the confidence and integrity of GFSI and the GFSI recognised schemes.

1.2.5.1 Methodology – Annual Assessment

A GFSI Assessor shall be appointed by the GFSI Executive Director. The GFSI Assessor has the responsibility for carrying out an assessment of the GFSI recognised scheme's compliance with the GFSI Guidance Document. The appointment shall be made with due consideration to the competence of the assessor, any potential conflict of interest and the activities of the scheme in question.

The review shall be undertaken to assess compliance against the requirements of *GFSI Guidance Document Part II Requirements for the Management of Schemes* and the appropriate sections of *GFSI Guidance Document Part III Scheme Scope and Key Elements* and the GFSI Agreement or Memorandum of Understanding (available from the secretariat upon request). The review shall be conducted on an annual basis on the anniversary of the date of initial GFSI recognition.

The review shall take the form of:

- ▶ an annual self-assessment against defined criteria, or...
- ▶ an office assessment of a scheme's management system and operation to be carried out once within a four year period based on the anniversary of the date of initial GFSI recognition. The date of this review will be at the discretion of the GFSI Board, but the scheme owner will be notified of the date of the review.

With respect to the annual self-assessment, the GFSI Assessor will review the self-assessment documentation and notify the GFSI Executive Director of any issues identified by the review.

With respect to the office assessment the GFSI Assessor shall visit the registered office of the scheme owner and assess objective evidence of compliance of the scheme's management system with the GFSI Guidance Document and the GFSI Agreement or Memorandum of Understanding. The GFSI Assessor shall formally report the findings of the review to the GFSI Executive Director.

In the event that the annual assessment establishes that there are significant concerns with the compliance of the scheme with the GFSI Guidance Document or the GFSI Agreement or Memorandum of Understanding, the nominated GFSI Assessor will make the GFSI Executive Director aware of his / her concerns, so that the agreement of the GFSI Board may be sought as to any appropriate actions.

Action may involve further verification of compliance, assurances of compliance and reassessment and the withdrawal or suspension of recognition. The scheme owner shall have the right of appeal against the GFSI Board decision and the appeal shall be undertaken in accordance with the procedures specified in Annex 3 of this document. In addition to the annual assessment, the scheme owner shall provide an annual report of their activities at the request of GFSI (circulated on an annual basis to all GFSI recognised scheme owners).

1.2.6 Continued Recognition

The objective of monitoring a scheme is to assess the continued compliance by the scheme with the GFSI Guidance Document.

1.2.6.1 Methodology – Continued Recognition

Unlike an annual assessment, GFSI may, at its discretion, undertake an assessment of the activities of a recognised scheme at any time. This assessment will normally be requested in the event that there is evidence of, or substantive suspicion of, non-compliance of the scheme with the requirements of the GFSI Guidance Document or the GFSI Agreement or Memorandum of Understanding.

If it is deemed necessary by the GFSI Executive Director that an assessment of the scheme's activities should be conducted, the scheme owner shall be informed of the intention to carry out additional assessments and a programme of review shall be agreed upon. The GFSI Executive Director shall make the scheme owner aware of the reasons for the assessment. The assessment may take the form of the requirement to provide GFSI with evidence of compliance or that of an office assessment carried out by an appointed GFSI Assessor.

The GFSI Assessor shall be appointed by the GFSI Executive Director. The appointment shall be made with due consideration to the competence of the assessor, any potential conflict of interest and the activity of the scheme in question.

In the event that the assessment establishes that there are significant concerns about the compliance of the scheme with the GFSI Guidance Document or the GFSI Agreement or Memorandum of Understanding, the nominated GFSI Assessor will make the GFSI Executive Director aware of his / her concerns. The GFSI Executive Director and Board of Directors shall take appropriate action, which may involve further verification of compliance, assurances of continued compliance and the withdrawal or suspension of recognition. The scheme owner shall have the right of appeal against the GFSI Board decision and the appeal shall be undertaken in accordance with the procedures specified in Annex 3 of this document.

1.2.7 Documentation

The GFSI Benchmark Committee Leader shall systematically record all information appertaining to the assessment of a scheme during the benchmarking process or annual assessment and this information shall be retained by the GFSI Executive Director for a period of ten years.

1.2.8 Dismissal of GFSI Benchmark Committee Leaders and Benchmark Committee Members

The GFSI Executive Director shall have the discretion to remove and replace any member, including the GFSI Benchmark Committee Leader of a Benchmark Committee, at any time if it is deemed necessary to do so. It is also at the discretion of the GFSI Executive Director to remove an individual from the Register of Benchmark Committee Members.

1.2.9 The Benchmarking Programmes

The key activities, responsibility for these activities and timescales for completion are specified in the following tables in relation to new applicant schemes and schemes, which require re-benchmarking or an extension to scope of recognition.

Table 1: Process Steps and Timescales for New Scheme Applications

Process Step	Description	Responsibility	Typical Timescale for Activity	Total Timescale
Preliminary Screening & Benchmarking Application	Completion and submission of an application dossier and scheme review documentation	Scheme Owner		5 weeks
Preliminary Screening & Benchmarking Application	Appointment of GFSI Benchmark Committee Leader	GFSI Executive Director	1 week	
Preliminary Screening & Benchmarking Application	Review of application dossier and confirmation of decision to accept the application	GFSI Executive Director	2 weeks	
Preliminary Screening & Benchmarking Application	Issue of GFSI Agreement or Memorandum of Understanding	GFSI Executive Director	Upon confirmation of acceptance of application dossier	
Preliminary Screening & Benchmarking Application	Completion of Agreement or Memorandum of Understanding agreement	GFSI Executive Director and Scheme Owner	2 weeks	
Preliminary Screening & Benchmarking Application	Publication of confirmation of benchmarking of scheme on GFSI website	GFSI Executive Director	Once Agreement or Memorandum of Understanding signed.	
Desk Review	Appointment of nominated Board member	GFSI Executive Director and GFSI Board	1 week	5 weeks
Desk Review	Completion of Desk Review and Assessment Matrix	GFSI Benchmark Committee Leader and Scheme Owner	4 weeks	
Desk Review	Appointment of Benchmark Committee members	GFSI Benchmark Committee Leader and GFSI Executive Director	Within the 4 week period of desk review	
Desk Review	Provision of Assessment Matrix and supporting documentation to Benchmark Committee members and scheme owner	GFSI Benchmark Committee Leader	At the end of the preliminary desk review period	

Process Step	Description	Responsibility	Typical Timescale for Activity	Total Timescale
Benchmark Committee Review	Assessment by the Benchmark Committee	GFSI Benchmark Committee Leader	4 weeks	12 weeks
Benchmark Committee Review	Meeting between the Benchmark Committee and the Scheme Owner to review assessment findings	GFSI Benchmark Committee Leader and Scheme Owner	2 days	
Benchmark Committee Review	Drafting and issuing of report	GFSI Benchmark Committee Leader	1 week	
Benchmark Committee Review	Stakeholder consultation Schedule Board conference call if necessary (a conference call will be scheduled if no Board Meeting will take place before application close date).	GFSI Executive Director	4 weeks	
Benchmark Committee Review	Review of consultation feedback	GFSI Benchmark Committee Leader	1 week	
Benchmark Committee Review	Drafting and issuing of final report to include actions resulting from Stakeholder Consultation. Final report and recommendation sent to GFSI Board	GFSI Benchmark Committee Leader	2 weeks	
GFSI Board Review	GFSI Board meeting and decision	GFSI Board and GFSI Executive Director	1 day	1 week
GFSI Board Review	Communication of the GFSI Board decision	GFSI Executive Director	1 day	

Table 2: Process Steps and Timescales for a Scheme Seeking Re-benchmarking or Extensions to Scope of Recognition

Process Step	Description	Responsibility	Typical Timescale for Activity	Total Timescale
Preliminary Screening & Benchmarking Application	Completion and submission of scheme review documentation	Scheme Owner		5 weeks
Preliminary Screening & Benchmarking Application	Appointment of GFSI Benchmark Committee Leader	GFSI Executive Director	1 week	
Preliminary Screening & Benchmarking Application	Review of application dossier and confirmation of decision to accept the application.	GFSI Executive Director	2 weeks	
Preliminary Screening & Benchmarking Application	Issue of GFSI Agreement or Memorandum of Understanding	GFSI Executive Director	Upon confirmation of acceptance of application	
Preliminary Screening & Benchmarking Application	Completion of Agreement or Memorandum of Understanding agreement	GFSI Executive Director and Scheme Owner	2 weeks	
Preliminary Screening & Benchmarking Application	Publication of confirmation of status on GFSI website	GFSI Executive Director	Once Agreement or Memorandum of Understanding signed	
Desk Review	Completion of Desk Review and Assessment Matrix	GFSI Benchmark Committee Leader and Scheme Owner	2 weeks	2 weeks
Desk Review	Appointment of Benchmark Committee members	GFSI Benchmark Committee Leader and GFSI Executive Director	Within the preliminary desk review period	
Desk Review	Provision of Assessment Matrix and supporting documentation to Benchmark Committee members	GFSI Benchmark Committee Leader	At the end of the preliminary desk review period	

Process Step	Description	Responsibility	Typical Timescale for Activity	Total Timescale
Benchmark Committee Review	Assessment by the Benchmark Committee	GFSI Benchmark Committee Leader	3 weeks	10 weeks
Benchmark Committee Review	Meeting between the Benchmark Committee and the Scheme Owner to review assessment findings	GFSI Benchmark Committee Leader and Scheme Owner	2 days	
Benchmark Committee Review	Drafting and issuing of report	GFSI Benchmark Committee Leader	1 week	
Benchmark Committee Review	Stakeholder consultation	GFSI Executive Director	4 weeks	
Benchmark Committee Review	Review of consultation feedback	GFSI Benchmark Committee Leader	1 week	
Benchmark Committee Review	Drafting and issuing of final report to include actions resulting from Stakeholder Consultation Final report and recommendation sent to GFSI Board	GFSI Benchmark Committee Leader	1 week	
GFSI Board Review	GFSI Board meeting and decision	GFSI Board and GFSI Executive Director	1 day	1 week
GFSI Board Review	Communication of the GFSI Board decision	GFSI Executive Director	1 day	

1.2.10 Conformity with the GFSI Guidance Document

The GFSI Executive Director is responsible for the investigation of any complaints or suspected non conformity in relation to the compliance of a GFSI recognised scheme with the requirements specified within the GFSI Guidance Document.

In the event that a complaint or report is received by the GFSI Executive Director regarding the non conformity of a scheme with the GFSI Guidance Document, the Executive Director will promptly acknowledge, in writing, the receipt of the complaint or report to the party concerned.

When a complaint is received, the GFSI Executive Director shall initiate investigative procedures to verify the accuracy and correctness of the complaint (section 1.2.6).

The Executive Director shall ensure that the details of the complaint are clearly understood and documented and that any claims or comments made by the complainant are properly authenticated and appropriately documented. This authentication shall be verified as being accurate and correct by independent sources, in addition to the complaint. It is the responsibility of the complainant to provide information that can be appropriately authenticated. It is at the discretion of the GFSI Executive Director to appoint an independent GFSI Assessor at any stage during the investigation process, but the GFSI Executive Director must ensure impartiality and preserve confidentiality.

If a GFSI Assessor is appointed, he / she shall carry out a thorough investigation of the complaint and, where possible, provide a resolution for the issues, fully document the complaint process and provide a detailed report to the GFSI Executive Director.

In the event that evidence of non conformity against the requirements specified in the GFSI Guidance Document is found by a GFSI Assessor during the annual assessment, the GFSI Executive Director shall promptly contact the scheme owner concerned for comment (*sections 1.2.5 or 1.2.6*).

The GFSI Executive Director shall fully document the process of investigation and decision making.

The GFSI Executive Director shall make a decision after review of the submitted evidence and will either:

- 1. take no action against the scheme owner, or...**
- 2. convene a meeting of GFSI Board members to gain agreement on one of three possible outcomes - continued recognition, suspension of recognition, or the withdrawal of recognition.**

Irrespective of the decision taken by the GFSI Executive Director, all parties involved shall be informed in writing of the decision and the justification for the actions taken.

1.2.10.1 The GFSI Suspension of Recognition Procedure

If, following review of the evidence gathered and submitted by the GFSI Executive Director and consultation with the scheme owner, the GFSI Board considers that a period of suspension of recognition shall be imposed, the scheme owner shall be informed of this decision and any conditions imposed by the GFSI Board to regain recognition status. The period of suspension of recognition and expected outcomes shall be made known to the scheme owner.

The scheme owner shall confirm to the GFSI Board that these conditions can be achieved within the timescales set out by the GFSI Board, when evidence of corrective action can be expected and continued conformity to the requirements of the GFSI Guidance Document can be established.

If the GFSI Board is not satisfied with the commitment of the scheme under suspension to take the appropriate corrective action, they shall withdraw recognition (section 1.2.10.2).

In the event that a period of suspension is imposed, the GFSI website shall clearly specify the details and conditions of the suspension.

1.2.10.2 The GFSI Withdrawal of Recognition Procedure

If, following review of the evidence gathered and submitted by the GFSI Executive Director and consultation with the scheme owner, the GFSI Board considers that a withdrawal of recognition is required, the scheme owner shall be informed of this decision.

In the event that GFSI recognition is withdrawn, GFSI shall issue a press release and the GFSI website shall clearly specify the details and conditions of the withdrawal.

1.2.11 The GFSI Appeals Procedure – GFSI Recognition

The scheme owner has a right of appeal against any decision made by the GFSI Board, the GFSI Executive Director or any person contracted to the GFSI in relation to the benchmarking process and associated systems and procedures. The appeal shall be conducted in accordance with the GFSI Appeals Procedure (*Annex 3 – The GFSI Appeals Procedure*). Only the scheme owner to which the decision relates has the right of appeal to the GFSI Board.

The scheme 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 the justification for the appeal, together with substantive evidence for the investigation of the appeal.

When the appeal procedure is initiated, the status of the scheme shall be amended on the GFSI website to reflect that the scheme is subject to appeal.

Any appeal shall be heard by a Committee (the Appeals Committee), which is a body specifically assembled by the GFSI Board for the purposes of hearing an individual appeal. The GFSI Board shall ensure that such an Appeals Committee should not include any person or GFSI member of staff involved with the decision, which is being appealed. The Appeals Committee shall be assembled from members of the Advisory Council and shall consist of a minimum of three members of the Council. The GFSI shall ensure that the investigation is conducted in an impartial and professional manner and without any actual or perceived conflict of interest.

The final 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.

The decision submitted to the GFSI Board by the Appeals Committee shall be conveyed to the scheme owner raising the appeal. The decision of the Appeals Committee shall be final and the appeal closed.

2. The Benchmark Committee

2.1 Introduction

A Benchmark Committee is a committee, which is formed to carry out a benchmarking process for a scheme that has applied to the GFSI for formal recognition. A Benchmark Committee will be formed for each accepted application following the decision by the GFSI Executive Director to proceed with the application. The Committee membership will be determined by the GFSI Executive Director having taken advice from an appointed GFSI Benchmark Committee Leader.

The Benchmark Committee shall be made up of suitably qualified persons or organisations that are independent, impartial and technically competent from organisations such as retailers and manufacturers and other appropriate experts.

The Benchmark Committee shall undertake its duties in accordance with the Terms of Reference (*Annex 2 - GFSI Benchmark Committee Terms of Reference*).

2.2 Membership

Upon agreement by GFSI to benchmark an applicant scheme, the GFSI Executive Director shall appoint a GFSI Benchmark Committee Leader from a cohort of independent technical experts, who have undergone a selection process and who meet the criteria specified in *Annex 2 - GFSI Benchmark Committee Terms of Reference*.

The GFSI Executive Director shall appoint a GFSI Benchmark Committee Leader for each scheme application.

The GFSI Executive Director shall appoint a GFSI Benchmark Committee Leader for the management of the desk review and the benchmark committee review process. The name of the GFSI Benchmark Committee Leader shall be made known to the scheme owner upon confirmation of the appointment.

2.2.1 Benchmark Committee Membership- New Applicant Schemes

The GFSI Executive Director shall invite technical experts to become members of the Benchmark Committee. The selection of the Committee members shall ensure that the following structure is achieved prior to any work being undertaken on the Assessment Matrix and any supporting documentation:

- ▶ GFSI Benchmark Committee Leader,
- ▶ GFSI representative – Executive Director,
- ▶ 5 representatives of retailers, suppliers or food service companies, who have knowledge and expertise in the application of GFSI recognised schemes (there shall be at least one retailer and one supplier within this group),
- ▶ 1 Accreditation Body representative (an Accreditation Body that is a member of the IAF and accredits Certification Bodies with a scope for a GFSI recognised scheme-optional),
- ▶ 1 GFSI Board member,
- ▶ 1 GFSI Advisory Council member (observer).

The retailer, supplier and food service company representatives shall not be committed users of the scheme being considered for recognition.

2.2.2 Benchmark Committee Membership – Schemes Seeking Re-benchmarking or Extensions to Scope of Recognition

The GFSI Executive Director and the appointed GFSI Benchmark Committee Leader shall invite technical experts to become members of the Benchmark Committee. The selection of Committee members shall ensure that the following structure is achieved prior to any work being undertaken on the Assessment Matrix and any supporting documentation:

- ▶ GFSI Benchmark Committee Leader,
- ▶ GFSI representative – Executive Director,
- ▶ 1 retailer/food service company representative with knowledge and expertise in the application of GFSI recognised schemes,
- ▶ 1 supplier representative, who has knowledge and expertise in the application of GFSI recognised schemes.

The retailer, supplier and food service company representatives shall not be committed users of the scheme being considered for recognition.

2.3 Member Selection

The selection of a Benchmark Committee shall be in accordance with the procedures specified in *Annex 2 - GFSI Benchmark Committee Terms of Reference*.

GFSI shall hold a Register of Benchmark Committee Members, who may be invited to become a member of a GFSI Benchmark Committee. The Register of Benchmark Committee Members shall be publicly available on the GFSI website.

Each member of the Committee shall meet the credentials defined by the GFSI and act in a professional manner at all times (*Annex 2 - GFSI Benchmark Committee Terms of Reference*).

The GFSI Executive Director shall have the discretion to remove and replace a member of a Benchmark Committee at any time if deemed necessary. It is also at the discretion of the GFSI Executive Director to remove an individual from the Register of Benchmark Committee Members.

The GFSI Executive Director has the responsibility to investigate any malpractice or alleged malpractice, which may arise during the benchmarking process and take appropriate action.

ANNEX 1

Scheme Application Guidelines

Scheme Application Guidelines

A scheme owner shall make an application to GFSI using the documentation downloaded from the GFSI website (www.mygfsi.com).

The application documentation will differ in relation to the status of the scheme; i.e. a scheme seeking recognition for the first time or a scheme seeking re-benchmarking or an extension to scope of recognition. The application documentation format will also differ to reflect the sector specific requirements within the *GFSI Guidance Document Part III Scheme Scope and Key Elements*.

In the case of a new applicant scheme the application documentation will include a dossier, which, upon completion, will provide demonstrable evidence of the requirements specified in the GFSI Guidance Document.

In all cases the scheme shall, irrespective of its status, complete the application, which will include:

(a) A summary of the scheme, its objective, details of its development and the operating procedures required for certification,

(b) 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,

(c) The requirements of the scheme's management system must be cross-referenced with *GFSI Guidance Document Part II Requirements for Management of Schemes*.

All documents shall be completed in full, in English and, where references are made, these shall be submitted as text with numerical cross references.

The application documentation shall be submitted to the GFSI Executive Director, who shall at that stage provide the scheme owner with an Agreement or Memorandum of Understanding (available from the secretariat upon request).

The application shall be supported by evidence of compliance with the GFSI Guidance Document requirements and the GFSI Benchmark Committee may request further information or data at any stage during the benchmarking process.

ANNEX 2

GFSI Benchmark Committee Terms of Reference

GFSI Benchmark Committee Terms of Reference

Introduction

The Global Food Safety Initiative (GFSI) is a non-profit making foundation, created under Belgian law. The daily management is undertaken by The Consumer Goods Forum, the only independent global network for consumer goods retailers and manufacturers worldwide. GFSI is a collaboration between some of the world's leading food safety experts, working to promote the convergence of food safety management schemes through a benchmarking process, thereby improving cost efficiency throughout the food supply chain via the common acceptance of GFSI recognised standards by global retailers.

The GFSI Mission is to provide continuous improvement in food safety management systems to ensure confidence in the delivery of safe food to consumers worldwide.

The GFSI Objectives are to:

- ▶ Reduce food safety risks by delivering equivalence and convergence between effective food safety management systems, as outlined in this Guidance Document,
- ▶ Manage cost in the global food system by eliminating redundancy and improving operational efficiency,
- ▶ Develop competencies and capacity building in food safety to create consistent and effective global food systems,
- ▶ Provide a unique international stakeholder platform for collaboration, knowledge exchange and networking.

GFSI Governance

The GFSI Board is a body that provides the strategic direction and oversees the daily management of GFSI. It is made up of experienced representatives from major retailer, manufacturer and food service members. Membership of the Board is by invitation only.

The GFSI Board also provides governance to the GFSI Technical Working Groups. The membership of the Technical Working Groups is by invitation of the GFSI Board. The Technical Working Groups work on specific selected projects as designated. The Terms of Reference are approved by the GFSI Board in order to fulfil the GFSI Mission.

The Advisory Council was established for the purposes of providing guidance and further expertise to the GFSI Board in their decision making.

The Governance of the GFSI Technical Working Groups

The GFSI Technical Working Groups are in place to execute the mandates specified by the GFSI Board within the timeframes provided.

The GFSI Board shall assign two Board members to act as a liaison to each of the Technical Working Groups to ensure that there is effective communication between the Board, the Advisory Council and stakeholders.

Benchmark Committees are individual ad-hoc Working Groups, which are formed upon the acceptance of an application of a scheme by the GFSI Executive Director and are disbanded at the request of the GFSI Board after the benchmarking process has been completed. There may be a number of Benchmark Committees in place at any one time.

Purpose

The purpose of a GFSI Benchmark Committee is to:

- ▶ ensure an applicant scheme's food safety system, standards and supporting procedures are objectively compared to the requirements laid down in the GFSI Guidance Document in accordance with the procedure defined in the GFSI Guidance Document,
- ▶ ensure the benchmarking process is carried out within an agreed timeframe,
- ▶ ensure the findings of the benchmarking process are clearly and concisely documented,
- ▶ submit recommendations to the GFSI Board for recognition or non-recognition of a scheme by GFSI in a report format.

The role of a GFSI Benchmark Committee Leader and a Benchmark Committee is to provide assessment and not to provide consultative advice to scheme owners.

Composition of a Benchmark Committee

There are two types of GFSI Benchmark Committee and the roles and responsibilities are dependent upon the status of the applicant scheme (*Section 1.2*)

Mandates and Duties of a Benchmark Committee

The duty of a Benchmark Committee is to carry out benchmarking procedures in accordance with those defined in the GFSI Guidance Document. These duties will be carried out on a voluntary and non-remunerated basis.

The Appointment of a GFSI Benchmark Committee Leader

The GFSI Benchmark Committee Leader will be selected by the GFSI Executive Director, with approval from the GFSI Board. The Executive Director shall confirm the qualifications and competence of an individual and their suitability to carry out the duties and responsibilities of a GFSI Benchmark Committee Leader through a process of interviews, the review of objective evidence of relevant information and references.

The GFSI Executive Director shall appoint a GFSI Benchmark Committee Leader for each scheme application.

The Appointment of a Benchmark Committee Member

The GFSI Executive Director and the appointed GFSI Benchmark Committee Leader shall invite technical experts from the Register of Benchmark Committee Members to become members of a Benchmark Committee. The selection of the members of a Benchmark Committee shall be dependent upon the role of that particular Committee; i.e. the assessment of a new scheme or the re-benchmarking or extension of scopes of recognition and with particular reference to their technical knowledge of product sectors.

The selection process for an expert to be considered for the Register of Benchmark Committee Members shall be carried out by interviews, the review of objective evidence of relevant information and references.

The GFSI shall hold and maintain a Register of individuals (Benchmark Committee Members), who may be invited to become a member of a GFSI Benchmark Committee. This information shall be publicly available on the GFSI website.

In the event that a suitable Benchmark Committee cannot be formed, the GFSI Executive Director shall inform the GFSI Board which shall, in turn, decide on any action to be taken.

De-registration of a GFSI Benchmark Committee Leader or a Benchmark Committee Member

The GFSI Executive Director shall have the discretion to remove and replace a member of a Benchmark Committee at any time, if it is deemed necessary to do so. It is also at the discretion of the GFSI Executive Director to remove an individual from the Register of Benchmark Committee Members.

The GFSI Executive Director has the responsibility to investigate any malpractice or alleged malpractice, which may have arisen during the benchmarking process and take appropriate action.

The GFSI Board has the authority to dismiss or withdraw registration of any GFSI Benchmark Committee Leader or Benchmark Committee Member at any time.

Benchmark Committee Structure – New Scheme Application

- ▶ GFSI Benchmark Committee Leader (voting member),
- ▶ GFSI representative – Executive Director (non-voting member),
- ▶ 5 representatives of retailers, suppliers or food service companies, who have knowledge and expertise in the application of GFSI recognised schemes. There should be at least one retailer and one supplier within this group (voting members),
- ▶ 1 Accreditation Body representative (an Accreditation Body that is a member of the IAF and accredits Certification Bodies with a scope for a GFSI recognised scheme-optional – non-voting member),
- ▶ 1 GFSI Board member (voting member),
- ▶ 1 GFSI Advisory Council member (observer).

Benchmark Committee Structure – Extension to Scope of Recognition and benchmarking Application

- ▶ GFSI Benchmark Committee Leader (voting member),
- ▶ GFSI representative – secretariat (non-voting member),
- ▶ 1 retailer or food service company representative (voting member),
- ▶ 1 supplier representatives (voting member).

Responsibilities of Benchmark Committee Members

The appointed GFSI Benchmark Committee Leader shall have the following responsibilities:

- ▶ to manage the benchmarking process for a scheme application,
- ▶ to fully document all proceedings of the benchmarking process,
- ▶ to use their experience, expertise and knowledge to provide input into the assessment of a scheme application,
- ▶ to manage communication between the scheme owner, benchmark committee members, the GFSI Executive Director, the appointed GFSI Board member for the scheme application and the GFSI Board,
- ▶ to ensure that the benchmarking programme timescales are achieved,
- ▶ to suspend the benchmarking process in the event that it is deemed that issue resolution will not result in recognition or timescales to achieve recognition are compromised,
- ▶ to manage the annual assessment process,
- ▶ to undertake, at the instruction of the GFSI Board or GFSI Executive Director, any ad hoc review of a recognised scheme's management system,

- ▶ to act in a professional, ethical and impartial manner at all times.

In the event that the Benchmark Committee Leader decides to suspend the benchmarking process for any reason, he / she shall immediately notify the GFSI Executive Director of this decision, who, in turn, will notify the GFSI Board.

The registered Benchmark Committee Members shall have the following responsibilities:

- ▶ to use their experience, expertise and knowledge to provide input into the assessment of a scheme application,
- ▶ to effectively communicate with the GFSI Benchmark Committee Leader or any other party, if requested to do so by the GFSI Benchmark Committee Leader,
- ▶ to ensure assigned activities are undertaken within the agreed timescales,
- ▶ to act in a professional, ethical and impartial manner at all times.

The GFSI Executive Director shall have the following responsibilities with regards to the benchmarking process:

- ▶ to provide administrative support to the GFSI Benchmark Committee Leader,
- ▶ to ensure all events and activities are fully and accurately documented and records retained,
- ▶ to investigate and act upon any issue arising from the performance or possible conflict of interests of Benchmark Committee Members.

Rules of Procedure for a Benchmark Committee

The GFSI Benchmark Committee Leader and Benchmark Committee members shall carry out their duties in accordance with procedures specified in this document.

The GFSI Benchmark Committee Leader shall publish a programme of activities on the date of the establishment of a Benchmark Committee and this programme will be made known to all members of the Benchmark Committee and the scheme owner. In the event that there are changes to this programme the members of the Benchmark Committee and the scheme owner will be informed of these changes.

The GFSI Benchmark Committee Leader shall ensure correct procedures are undertaken during the benchmarking process and work with the GFSI Executive Director to record and document proceedings and decisions.

The GFSI Benchmark Committee Leader shall ensure, through the GFSI Executive Director, that all information regarding the benchmarking process is clearly and concisely documented and provided to all parties involved in a timely manner. The GFSI Benchmark Committee Leader, with the assistance of the GFSI Executive Director, shall be responsible for the recording, maintenance and retention of this information.

Members of a Benchmark Committee shall commit to participate in or attend meetings convened by the GFSI Benchmark Committee Leader in their entirety and shall also be committed in terms of time and effort to achieve objectives set by the GFSI Board. In the event that a meeting is convened and there is non-attendance of members, the meeting shall only take place if there is a quorum of members present.

Note: for the purposes of a GFSI Benchmark Committee meeting benchmarking a new scheme, a quorum is regarded as being 3 members of the Committee. This shall be the GFSI Benchmark Committee Leader and two industry representatives (retailer, manufacturer or food service provider).

Note: for the purposes of a GFSI Benchmark Committee meeting re- benchmarking or reviewing for an extension to scope of recognition, a quorum is regarded as being 3 members. This shall be the GFSI Benchmark Committee Leader and two industry representatives (retailer, manufacturer or food service provider).

Members of a Benchmark Committee shall act in a professional, ethical and impartial manner at all times and shall not use any information obtained to commercially promote their own or their organisation's interests. The selection of members of a Benchmark Committee shall ensure that there is no conflict of interest in relation to an individual, organisation or association. However, in the event that there could be a change in the status of this non conflict of interest, the Benchmark Committee member must make the GFSI Executive Director aware of the circumstances and the GFSI Executive Director will take any action necessary to resolve issues that may arise.

If a vote is necessary to decide upon the recommendation to the GFSI Board, only voting members of the Committee will be allowed to vote. The GFSI Benchmark Committee Leader will ensure all members vote on the recommendation to the GFSI Board. For the purposes of re-benchmarking or extension to scope, the GFSI Benchmark Committee Leader shall have the casting vote if an equal number of recognition and non-recognition votes are given by Committee members.

All information provided by a scheme owner shall be regarded as being confidential and the GFSI Benchmark Committee Leader and members of a Benchmark Committee will honour this agreement. At the time of their registration and acceptance of an invitation to become a member of a Benchmark Committee any GFSI Benchmark Committee Leader or Reviewer shall sign a declaration of confidentiality and impartiality.

All information in relation to the benchmarking process shall be regarded as confidential and shall be securely retained by the GFSI Executive Director.

In the event that members are asked to leave a Benchmark Committee during the benchmarking programme, the GFSI Executive Director and GFSI Benchmark Committee Leader shall invite a new member onto the Committee and the GFSI Benchmark Committee Leader shall ensure that the new member is made fully aware of information appertaining to the benchmarking process.

If the GFSI Benchmark Committee Leader leaves or is asked to leave a Benchmark Committee during the benchmarking programme, the GFSI Executive Director will take immediate steps to appoint a new GFSI Benchmark Committee Leader.

The GFSI Executive Director shall have the discretion to remove and replace a member of a Benchmark Committee at any time, if it is deemed necessary to do so. It is also at the discretion of the GFSI Executive Director to remove an individual from the Register of Benchmark Committee Members.

The GFSI Executive Director has the responsibility to investigate any malpractice or alleged malpractice, which may have arisen during the benchmarking process and take appropriate action.

The GFSI Board has the authority to dismiss or withdraw registration of any GFSI Benchmark Committee Leader or Reviewer at any time.

Benchmark Committee Leader Qualifications, Experience, Knowledge, Skills and Personal Attributes

Qualifications

A GFSI Benchmark Committee Leader shall have attained, as a minimum, a degree in a food related or bioscience discipline.

A GFSI Benchmark Committee Leader shall have successfully completed a qualification in relation to Lead Auditor status for Quality Management Systems.

Experience

A GFSI Benchmark Committee Leader shall have a minimum of 10 years full time experience in the food industry in areas such as quality assurance or in a food safety function in food production or manufacturing, retailing, inspection, auditing or enforcement.

A GFSI Benchmark Committee Leader shall have significant food safety auditing experience.

Knowledge

A GFSI Benchmark Committee Leader shall have:

- ▶ a detailed knowledge of the GFSI Guidance Document,
- ▶ a detailed knowledge of the mission and objectives of GFSI,
- ▶ a detailed knowledge of the GFSI benchmarking process,
- ▶ a detailed knowledge of food safety management systems, applicable procedures or other management systems and documents used as audit criteria,
- ▶ a detailed knowledge of audit principles, procedures and techniques in relation to food safety auditing,
- ▶ a detailed knowledge of general business processes and understand the workings of organisations in relation to size, structure, function and relationships with specific reference to quality management and food safety management,
- ▶ a detailed knowledge of accreditation and certification processes and procedures,
- ▶ a detailed technical knowledge of specific food product sectors,
- ▶ a knowledge of key food legislative requirements.

Skills

A GFSI Benchmark Committee Leader shall have:

- ▶ good organisational and time management skills,
- ▶ the ability to make correct decisions based on objective and verifiable evidence,
- ▶ the ability to understand and interpret written material with particular reference to system development and operational, food safety and legislative requirements,
- ▶ good, appropriate written communication skills so that communications can be understood by the intended audience,
- ▶ the ability to produce clear and accurate reports of assessment findings and clearly articulate these in relation to GFSI Guidance Document requirements,
- ▶ the ability to understand and interpret verbal material,
- ▶ good, appropriate oral communication skills so that communications can be understood by the intended audience,
- ▶ the ability to effectively control and manage meetings during the assessment process,

- ▶ the ability to effectively and systematically assess situations and information to make informed decisions on objective and verifiable evidence,
- ▶ skills to ensure effective communication between themselves and other people,
- ▶ good people management skills,
- ▶ the ability to provide direction and guidance to the Benchmark Committee members,
- ▶ the ability to prevent and resolve conflicts,
- ▶ the ability to lead the Benchmark Committee members to reach conclusions.

Personal Attributes

A GFSI Benchmark Committee Leader shall be:

- ▶ fair, truthful, unbiased, sincere, discreet, trustworthy and honest,
- ▶ able to demonstrate a high level of personal integrity,
- ▶ open-minded, reasonable and willing to consider alternative ideas or points of view,
- ▶ tactful in dealings with people, as appropriate to achieve the benchmarking objectives,
- ▶ instinctively aware of and able to understand situations,
- ▶ able to adjust readily to different situations and to effectively resolve conflict and arrive at consensus agreement where possible,
- ▶ persistent and focussed in their approach to achieve objectives,
- ▶ able to reach timely conclusions based on logical reasoning and analysis and, in the case of possible conflict, be confident to manage and control discussions. The individual will assume the leadership role during problematical discussions and situations in order to resolve issues,
- ▶ able to act effectively and function independently,
- ▶ able to be professional and ethical and make decisions even though these actions and decisions may result in disagreement, confrontation or appeal proceedings,
- ▶ courteous, conscientious, discreet and business like in their approach,
- ▶ empathetic, respectful to others and able to engender trust,
- ▶ able to keep relevant information confidential in accordance with non-disclosure or confidentiality agreements,
- ▶ able to communicate confidently and with authority to secure agreement with scheme owner management,
- ▶ able to maintain strict independence from self-interest or personal bias,
- ▶ able to effectively plan, prioritise and adjust the activities of the benchmarking process, as far as possible without adversely affecting the outcome of assessment.

Prior to entry into the Register of Benchmark Committee Members, a GFSI Benchmark Committee Leader shall sign a statement of confidentiality, impartiality and non conflict of interest and provide this to the GFSI Executive Director. In the event that personal circumstances mean that this statement is compromised, the GFSI Benchmark Committee Leader will inform the GFSI Executive Director, who will, in turn, take appropriate steps to ensure that the integrity of GFSI is not compromised.

The Register of GFSI Benchmark Committee Leaders shall be published on the GFSI website within the Register of Benchmark Committee Members.

Benchmark Committee Member Qualifications, Experience, Knowledge, Skills and Personal Attributes

Qualifications

A GFSI Benchmark Committee Member shall have attained, as a minimum, a degree in a food related or bioscience discipline.

Experience

A GFSI Benchmark Committee Member shall have a minimum of 5 years full time experience in the food industry in the sector relevant to the scope of the scheme application, including areas such as quality assurance or in a food safety function in food production or manufacturing, retailing, inspection, auditing or enforcement or the equivalent.

A GFSI Benchmark Committee Member shall have significant food safety auditing experience.

Knowledge

The GFSI Benchmark Committee member shall have:

- ▶ a detailed knowledge of the GFSI Guidance Document,
- ▶ a detailed knowledge of the mission and objectives of GFSI,
- ▶ a knowledge of the GFSI benchmarking process,
- ▶ a detailed knowledge of food safety management systems, applicable procedures or other management systems and documents used as audit criteria,
- ▶ a detailed knowledge of audit principles, procedures and techniques in relation to food safety auditing,
- ▶ a detailed knowledge of general business processes and an understanding of the workings of organisations in relation to size, structure, function and relationships with specific reference to quality management and food safety management,
- ▶ a knowledge of accreditation and certification processes and procedures,
- ▶ a detailed technical knowledge of specific product sectors,
- ▶ a knowledge of key food legislative requirements.

An applicant for the Register of Benchmark Committee Members shall be trained by GFSI on the GFSI Benchmarking processes and procedures. This training shall be undertaken upon selection and prior to entry into the Register of Benchmark Committee Members.

Skills

The GFSI Benchmark Committee Member shall have:

- ▶ good organisational and time management skills,
- ▶ the ability to make correct decisions based on objective and verifiable evidence,
- ▶ the ability to understand and interpret written material with particular reference to system development and operational, food safety and legislative requirements,
- ▶ good, appropriate written communication skills so that communications can be understood by the intended audience,
- ▶ the ability to understand and interpret verbal material,
- ▶ good, appropriate oral communication skills so that communications can be understood by the intended audience,

- ▶ the ability to effectively and systematically assess situations and information to make informed decisions using objective and verifiable evidence,
- ▶ skills to ensure effective communication between themselves and other people.

Personal Attributes

A GFSI Benchmark Committee Member shall be:

- ▶ fair, truthful, unbiased, sincere, discreet, trustworthy and honest,
- ▶ able to demonstrate a high level of personal integrity,
- ▶ open-minded, reasonable and willing to consider alternative ideas or points of view,
- ▶ tactful in dealings with people, as appropriate, to achieve the benchmarking objectives,
- ▶ instinctively aware of and be able to understand situations,
- ▶ able to adjust readily to different situations and to effectively resolve conflict and arrive at consensus agreement, where possible,
- ▶ persistent and focussed in their approach to achieve objectives,
- ▶ able to reach timely conclusions based on logical reasoning and analysis and, in the case of possible conflict, be confident to manage and control discussions,
- ▶ able to act effectively and function independently,
- ▶ professional and ethical and make decisions even though these actions and decisions may result in disagreement, confrontation or appeal proceedings,
- ▶ courteous, conscientious, discreet and business like in their approach,
- ▶ empathetic, respectful to others and able to engender trust,
- ▶ able to keep relevant information confidential in accordance with non-disclosure or confidentiality agreements,
- ▶ able to maintain strict independence from self-interest or personal bias.

Prior to entry into the Register of Benchmark Committee Members, a GFSI Benchmark Committee Member shall sign a statement of confidentiality, impartiality and non-conflict of interest and provide this to the GFSI Executive Director. In the event that personal circumstances mean that this statement is compromised, the GFSI Benchmark Committee Member will inform the GFSI Executive Director, who will, in turn, take appropriate steps to ensure that the integrity of GFSI is not compromised.

ANNEX 3

The GFSI Appeals Procedure - GFSI Benchmarking

The GFSI Appeals Procedure - GFSI Benchmarking

Introduction

The following procedure defines the process steps to be taken in the event that a scheme owner wishes to appeal against a decision taken by the GFSI Board, the GFSI Executive Director or any person contracted to the GFSI in relation to the benchmarking process and the associated systems and procedures. Only the scheme owner to whom the decision relates has the right of appeal to the GFSI Board regarding the status of GFSI recognition and the Appeal Notice shall be submitted by an authoritative person from the scheme management or governing board.

Procedure

The scheme owner shall submit an Appeal Notice to the GFSI Executive Director within 30 days of the matter in dispute occurring. The Appeal Notice shall be submitted in writing to the GFSI Executive Director and shall clearly describe the reason and the justification for the appeal, together with substantive evidence to assist with the investigation of the appeal.

The Appeal Notice shall clearly state the reason and rationale for the objection, contain documented objective evidence to support the appeal and details of the person responsible within the objecting scheme owner's organisation. The Appeal Notice shall be signed by an authoritative person from the objecting scheme owner and shall include the name, position, signature and date of signature.

The GFSI Executive Director shall formally acknowledge receipt of the Appeal Notice to the objecting scheme owner. This acknowledgement shall take place within 24 hours of receipt of the Appeal Notice. The GFSI Executive Director shall also notify the GFSI Board members within 24 hours of receipt of the Appeal Notice.

The GFSI Executive Director shall review the Appeals Notice with the Chairman of the GFSI Board. If it is deemed that the information provided in the Appeal Notice is insufficient or subjective in nature, he / she shall contact the signatory of the Appeal Notice and make his / her observations known. The scheme owner has the right to resubmit the Appeals Notice with additional information, but should they choose not to do so, the Chairman of the GFSI Board has the authority to reject the appeal at that stage.

In the event that an appeal is deemed not justified, then the scheme owner and the GFSI Board will be informed. The decision concerning the validity of the appeal shall be made within 2 days of the receipt of the Appeal Notice.

The GFSI Executive Director will make the decision known to the scheme owner and GFSI Board members whether or not to take forward or reject the appeal within 2 days of the receipt of the Appeal Notice. In the event that the appeal is not taken forward the reason for the decision will be made known to the scheme owner and GFSI Board members.

When the appeal procedure is initiated, the status of the scheme shall be amended on the GFSI website to reflect that the scheme is subject to appeal.

The appeal shall be considered by an Appeals Committee, which is a committee specifically assembled by the GFSI Board. The GFSI Executive Director shall ask the Chairman of the GFSI Board to invite three members of the Advisory Council to sit on the Committee. The GFSI Executive Director shall ensure that none of the invited members of the Advisory Council has any possible conflict of interest in relation to the scheme owner appealing against the decision of the GFSI. The Appeals Committee shall be appointed within two weeks of confirmation of acceptance by the GFSI Executive Director of taking forward the appeal.

The Chairman of the GFSI Board shall appoint an Appeals Committee Chairman, who will have responsibility to co-ordinate the activities of the Committee, document all actions, comments and decisions appertaining to the appeal and report back to the GFSI Board on their decision to uphold or reject the appeal. The Chairman of the Appeals Committee shall ensure throughout all stages of the appeals process that all proceedings shall

be conducted in an impartial and professional manner.

The GFSI Executive Director shall ensure all members of the Appeals Committee have a complete copy of the Appeal Notice, signed by the scheme owner and any other information related to the appeal. This may include recognition application data, investigative documentation from complaint reviews or documentation relating to continuous assessment.

The Chairman of the Appeals Committee shall decide upon the duration of the review of information submitted by the GFSI Executive Director and make this known to other members of the Committee, the Chairman of the GFSI Board and the GFSI Executive Director. The duration of the investigative phase of the appeal will, however, be no longer than four weeks from receipt of the confirmation of the GFSI Executive Director to take the appeal forward.

During this investigative phase the chairman of the Appeals Committee will liaise with other committee members and the scheme owner to establish the validity of the objection and to collate information and opinions allowing a decision to be made. The liaison with the scheme owner will always be with the signatory of the Appeal Notice.

The Chairman of the Appeals Committee shall ensure a meeting takes place between the Appeals Committee and the scheme owner (signatory of the Appeal Notice and any other parties nominated by the signatory) within six weeks of the acceptance of the appeal by the GFSI Executive Director. The meeting will be fully minuted.

Following the meeting with the objecting scheme owner's representative(s), the Chairman of the Appeals Committee shall convene a meeting of all Appeals Committee members and review the appeal information and any other evidence to decide upon the acceptance or rejection of the appeal. This meeting will take place with two days of the meeting with the objecting scheme owner's representative(s). The meeting will be minuted and these minutes provided to the GFSI Board.

The decision to accept or reject the appeal by the members of the Appeals Committee will be made by consensus and, if a vote is required, the majority vote will decide the outcome of the appeal. Members of the Appeals Committee cannot abstain.

The Chairman of the Appeals Committee will inform the Chairman of the GFSI Board and the GFSI Executive Director of the Committee's decision within one day of the closure of the Appeals Committee meeting. The Chairman of the Appeals Committee shall also provide the GFSI Board with the minutes of the Appeals Committee meeting and any other evidence felt necessary to clarify or support their decision.

The decision made by the Appeals Committee is final and cannot be overturned by the GFSI Board.

If the Appeals Committee feels that an issue is identified that may require further investigation, they shall appoint an ad hoc committee, with clear terms of reference to carry out further work, to provide advice and guidance.

The Chairman of the GFSI Board shall ensure all other Board members are made aware of the decision of the Appeals Committee and he / she will write to the scheme owner making them aware of the status of recognition.

The GFSI Executive Director shall ensure that the status of the scheme is made known on the GFSI website as soon as the scheme owner is informed of the decision of the Appeals Committee by the Chairman of the GFSI Board.