



Enhancing Food Safety Through Third Party Certification



GLOBAL FOOD SAFETY INITIATIVE Enhancing Food Safety Through Third Party Certification

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Overview of GFSI and Accredited Certification

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Introduction

Global food trade is expanding and providing consumers with access to a wider variety of foods all year round. Expanding trade has brought the diversity of food safety regulations and standards in different countries into sharper focus. This regulatory diversity is compounded by varying consumer tastes and preferences, the ability to produce safe food and the willingness to pay for risk reduction technologies. Building common ground for food safety regulation through both public and private initiatives is helping to achieve the simultaneous goals of improving food safety and facilitating trade.

Food regulations are based on domestic law and practice. However, they also operate within an international framework of rules and agreements. In the past this institutional framework has often been under developed and poorly enforced. However, in the last twenty years these multilateral rules have become much more stringent concerning the development and use of standards.

Differences in food safety regulations and standards between importing and exporting countries can cause friction and even disputes that impede the international trade in food. Countries are nevertheless tackling the issues of food safety and trade through learning from each other's successes in managing food safety. In order to narrow regulatory differences, governments are working together to reach consensus on accepted standards. Private food safety initiatives, such as voluntary food safety and quality assurance standards, are also contributing to the resolution of cross border differences.

Overview of the Global Food Safety Initiative

The Global Food Safety Initiative (GFSI) is the result of collaboration between some of the world's leading food safety experts from retailers, manufacturers and food service companies, as well as service providers active in the food supply chain.

In May 2000, following a number of food safety incidents, the CEO's of a group of international retailers identified the need to enhance food safety, ensure consumer protection and to strengthen consumer confidence. The result was GFSI, a non-profit foundation, created under Belgian law, which sets the requirements for food safety schemes.

“Scheme” in the food safety certification industry, is a term used to define a commercial food safety programme that includes an auditable and certifiable food safety standard and a governance and management system.

As food safety is of paramount importance, the principal goal of GFSI is to ensure that the global supply chain is safe for consumers.

Governance and Structure

The GFSI governance process is vital in ensuring the fulfilment of the GFSI mission. The aim of the structure is to facilitate the exchange of information and the identification of best practice at an

international and multi-stakeholder level along the entire supply chain. In addition, the governance structure facilitates the ultimate aim of fulfilling the GFSI mission, which is safe food for consumers everywhere.

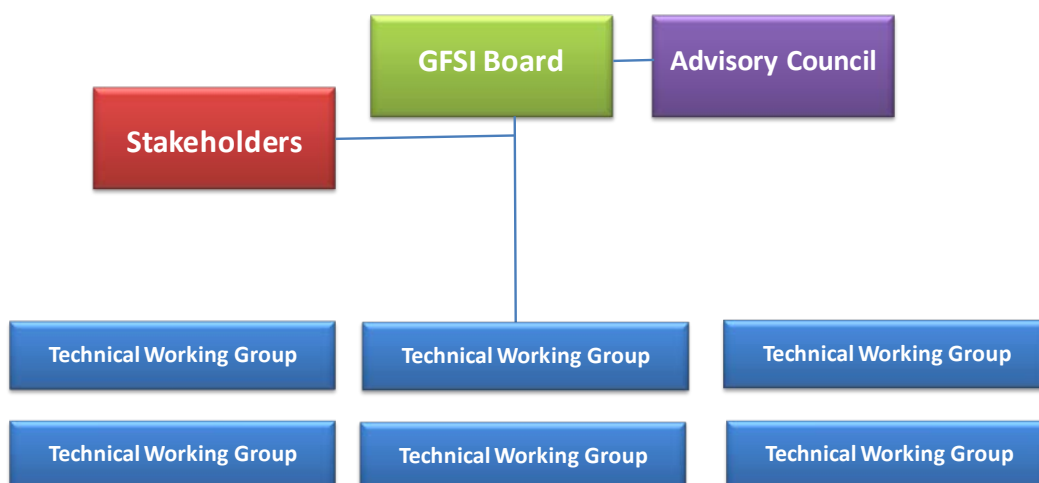
GFSI Board members are drawn from major retailers, manufacturers and food service operators. The Board provides strategic direction and oversight. A new governance structure was implemented in October 2008 by the GFSI in order to ensure that key partners in the supply chain are equally represented in the decision making process of the Board.

An Advisory Council, whose membership consists of academics, non-government organisations and government representatives, provides further expertise to the GFSI Board in its decision making concerning matters related to the mission, objectives and goals of GFSI. This body of experts has been in place since early 2010.

The GFSI Technical Working Groups are individual working groups composed of retailers, manufacturers, food service operators, standard owners, certification bodies, accreditation bodies, industry associations and other technical experts. Each Working Group meets independently throughout the year, according to a mandate set by the GFSI Board.

The GFSI Stakeholder Group is an international forum, open to all, which attracts retailers, manufacturers, certification bodies, accreditation bodies, standard owners, food safety experts and consultants. This annual meeting consists of an open dialogue on current and emerging food safety issues with the aim of identifying the priority areas for consideration by the GFSI Board as topics to be addressed over the following year. The purpose is to ensure that GFSI is run and managed by its members and is as inclusive and transparent as possible.

All of these groups are linked together to drive the strategic direction of GFSI. Any issues raised during the Stakeholder Forum are considered by the GFSI Board and, in turn, the GFSI Board provides the mandate to the GFSI Technical Working Groups to address the issues based on the recommendations made by GFSI Stakeholders. The GFSI Technical Working Groups are charged with delivering the objectives set by the GFSI Board and providing recommendations on technical issues.



Mission and Objectives

Those involved in the GFSI share a simple aim: “Safe Food for Consumers Everywhere”. The GFSI mission is simple, but highly meaningful, for all stakeholders with an interest in ensuring the production of safe food. The mission is ‘continuous improvement in food safety management systems to ensure confidence in the delivery of safe food to consumers.’

GFSI Objectives:

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

History of the Harmonised Approach

Prior to the creation of GFSI in 2000 there was a proliferation of demands for audits primarily from major buyers within the food supply chain. Different retailers often applied specific food safety requirements for particular products and suppliers were obliged to provide evidence, through a number of audits of their premises and systems, of their compliance with these varying specifications.

The emergence of national or regionalised harmonised schemes, developed by industry, such as the British Retail Consortium’s (BRC) Technical Standards and the International Food Safety Standard (IFS) in Europe, marked a step forward by allowing suppliers to carry out a single food safety audit to satisfy a number of retail customers. However, these schemes only provided a limited solution to the problem of the duplication of supplier audits, with many users of the schemes still being reluctant to move to only one, or to a series, of recognised schemes.

GFSI proposed a method by which it would be possible to take a harmonised approach to the recognition of food safety standards and their supporting systems, firstly by drawing up a set of food safety criteria to be incorporated into food safety standards and secondly by establishing common procedures for the accreditation and certification bodies responsible for verifying the implementation of these standards (the GFSI Guidance Document). This approach should allow a supplier in any country to commission a single audit regardless of the number and nationality of customers it supplies which will be accepted everywhere.

Benchmarking and Equivalency

Within GFSI, benchmarking provides the framework for the recognition of food safety schemes and is a “process by which a food safety scheme and food safety related schemes are compared to the GFSI Guidance Document to determine equivalence.” The process is carried out in an independent, unbiased, technically proficient and transparent manner. Schemes that are successfully benchmarked and recognised have a common foundation of requirements, which should provide consistent results when applied. However, benchmarked schemes cannot be considered identical because they differ in terms of

their level of prescription and specific needs.

GFSI Recognised Schemes and the Relationship to Codex

All the schemes recognised by GFSI have been developed over many years from standards created by individual organisations, such as retailers, sectors of industry or certification bodies. The GFSI recognised schemes have their origins in standards dating back to the early 1980's, with the major influence being the requirements specified by retailers for their suppliers of private label products.

The GFSI recognised schemes, by their very nature, are written in differing styles, but they all 'amplify' or describe in more detail the requirements laid down in the Codex General Principles of Food Hygiene Code of Practice. These schemes are reviewed and revised more regularly than the Codex General Principles of Food Hygiene Code of Practice and, therefore, attempt to address issues that are currently faced by the food industry; good examples of this are incident management, food defence and allergen management.

All GFSI recognised schemes and standards contain requirements that go beyond those laid down in the Codex General Principles of Food Hygiene Code of Practice. These additional requirements are seen by the food industry as being important to food safety or at least highly desirable in order to ensure continuing compliance; good examples are product specifications, product analysis, purchasing procedures, internal audit and full product/ingredient traceability. These supplementary requirements, by their very nature, add robustness and rigour to the base requirements of food safety principles and provide added confidence and further verification of processes.

Although it is very difficult to trace the precise origin of these schemes, they all reflect the need for compliance with legal requirements and are based on HACCP principles, food safety management systems and prerequisite programmes, such as Good Manufacturing Practices (GMP). It must be appreciated, however, that these schemes are all based on best practices and can, therefore, be traced back to the basic requirements of Codex standards. In fact, there are only a relatively small number of specific requirements, which cannot be referenced back to the Codex standards.

In 2009 GFSI commissioned a report to compare the GFSI Guidance Document, GFSI recognised schemes and the Codex General Principles of Food Hygiene Code of Practice. The key elements defined by the Codex Code of Practice to control risk factors throughout the production of food are found in the GFSI Guidance Document and the GFSI recognised schemes. The comparison document can be found at www.mygfsi.com. The comparison demonstrates convergence between the schemes with a strong foundation in food safety controls that are internationally recognised by both the industry and governments.



Figure 1: the elements that GFSI recognised schemes are built on, including the foundation of legal, regulatory requirements and Codex principles.

Benefits of Third Party Certification

There are benefits for all those involved in the supply chain in seeking certification as a means to demonstrate compliance with legal and industry food safety requirements, thus promoting customer confidence and market access. There is strong evidence to show that certified companies enjoy higher margins through efficiency savings resulting from the application of disciplines defined by one of the schemes. Certified companies are also able to show consistency in their respective processes across countries and continents, which, in turn, facilitate cross border trade.

One of the key benefits of using the GFSI recognised schemes is the independence between the scheme owner and the certification bodies who audit against the GFSI recognised schemes. By ensuring the separate management of both entities, the food industry can have the confidence that there is no conflict of interest and that full impartiality is applied during an audit.

Finally, the requirements defined in GFSI recognised schemes are accessible and shared by many. For the buying community, therefore, GFSI recognised schemes provide effective and shared risk management tools for protecting brands, improving consumer confidence and ensuring product integrity. Recent developments have also indicated that certification can provide benefits for governmental bodies by demonstrating compliance with legislation and the commitment of companies to controlling and managing food safety risks.

Conclusion

The increasingly diverse tastes of consumers and the realities of the food supply chain have created a global food economy in which local ideas and food products are gaining international recognition. Ensuring the security of a global food chain requires a more thoughtful approach about how food businesses and governments attempt to ensure food safety. Cooperation and coordination in the development and implementation of third party certification throughout the supply chain has taken on a new urgency and a new focus. Third party certification can provide consistency and cost efficiency, reduce duplication, increase confidence and help provide safe food for the consumer.



What is the GFSI Guidance Document Sixth Edition?

What is the GFSI Guidance Document Sixth Edition?

Introduction

In January 2011, the Global Food Safety Initiative (GFSI) published version 6 of the GFSI Guidance Document, continuing an iterative process that started in 2001 with the first Version.

GFSI is a non-profit foundation, managed by the Consumer Goods Forum, charged with providing 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 the 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.

The GFSI Guidance Document has been developed primarily to meet the first of these objectives. It defines the process by which food safety schemes may gain recognition by GFSI and gives guidance to schemes seeking compliance. In so doing, it also assists in meeting the remaining GFSI objectives:

- In encouraging convergence between food safety management systems, GFSI seeks to drive down costs by focusing industry on robust recognised systems with key food safety elements in common;
- GFSI requires competence and capacity not only within certified food businesses, but also the Scheme Owners, Certification Bodies, auditors, and Accreditation Bodies that assess the GFSI benchmarked schemes;
- GFSI's network of Technical Working Groups, stakeholders and industry experts provides extensive input to the development and ongoing improvement of the Guidance Document

What is the GFSI Guidance Document?

“Scheme” in the food safety certification industry is a term used to define a commercial food safety programme that includes an auditable and certifiable food safety standard and a governance and management system.

The GFSI Guidance Document defines the process by which food safety schemes may gain recognition by GFSI and gives guidance to schemes seeking compliance. It also specifies the requirements that a food safety scheme must implement to be considered for GFSI recognition, and defines the key elements for the production of safe food and/or feed that must be included in the standard. These elements were developed by members of the GFSI Technical Working Groups (TWGs) and other experts who advised on sector specific requirements. They are firmly based on the food safety principles laid down by the Codex

Alimentarius Commission (Codex), the National Advisory Committee on Microbiological Criteria for Foods (NACMCF), relevant ISO standards, and International Codes of Practice where appropriate.

What the Guidance Document is Not

It is important to recognise that the GFSI Guidance Document is not in itself a food safety standard. Food businesses cannot be audited or certified to the GFSI Guidance Document and GFSI is not involved in any certification or accreditation activities. The GFSI Guidance Document does not dictate policy for food retailers, manufacturers or scheme owners, or prescribe requirements for food quality, animal welfare, environmental standards, or any other area outside the scope of food safety.

Instead the GFSI Guidance Document provides a template against which food safety management schemes can be benchmarked and recognised as science-based, contemporary, and rigorous. It is a tool which fulfils one of the main objectives of GFSI, that of determining equivalency between food safety management systems.

GFSI is responsible for the publication and maintenance of the Document, which is available free of charge on the GFSI website (www.mygfsi.com).

The Revision Programme

Publication of version 6 concluded a revision programme that commenced in January 2010 with the formation of a Steering Committee to oversee the process. Through a series of working group meetings and two rounds of stakeholder consultation over twelve months, the GFSI Foundation Board approved Version 6 as better able to fulfil the GFSI objectives.

After publication, the GFSI Guidance Document remains subject to review and revision by the GFSI TWGs and there are sections of the document which shall be further reviewed and developed by specific TWGs over coming years. Stakeholders are invited to submit comments and proposals for changes, which will in turn be presented to the TWGs for consideration. A full review of the GFSI Guidance Document will be undertaken at least every four years, although addenda may be added at any time with the approval of the GFSI Board.

Through this process of continuous improvement, GFSI provides and manages the process, through which food safety management schemes achieve international recognition and acceptance by global retailers, manufacturers and food service operators. The decision as to which GFSI recognised scheme(s) to apply is dependent on company policy, food industry scope, customer requirements, general regulatory requirements, due diligence obligations and product liability.

What Has Changed Since Version 5?

Version 6 of the GFSI Guidance Document has a very different format to previous versions. It is more prescriptive than earlier versions; particularly in the areas of scheme management and food safety requirements, and intentionally so. As GFSI benchmarked schemes expand internationally into new and emerging markets, the integrity and governance applied to scheme ownership is central to achieving and maintaining the GFSI Vision and Mission.

Version 6 has a new modular format divided into four distinct parts:

- **Part I: The Benchmarking Process** outlines the key procedural steps and timelines that apply to new food safety schemes that have not previously been benchmarked, schemes applying for an extension of scope, and the re-benchmarking process for existing schemes, which is required every four years.

When schemes are completely aligned with the GFSI Guidance Document Version requirements, this results in an increase in confidence in the benchmarked schemes, which can then provide comparable audit results for users of third party certification.

In Version 6, the benchmarking process is more clearly defined, more open, and transparent. Scheme application guidelines are now formalised, as are the benchmarking criteria and the timeframes for the benchmarking processes. The terms of reference for Benchmarking Committees and Chairs are described in detail.

- **Part II: Requirements for the Management of Schemes** prescribes the governance and management requirements that must be implemented for a food safety scheme to be considered for benchmarking. These include, but are not limited to:
 - Evidence of the legal entity that owns and manages the scheme;
 - The documented process by which the scheme was developed and will be maintained;
 - The technical competence of key stakeholders who developed and maintain the scheme;
 - Procedures to prevent or manage conflicts of interest;
 - A food safety management standard based on the principles of ISO/IEC Guide 65 or ISO/IEC 17021 with a clearly defined scope of activity;
 - Procedures for managing Certification Bodies that operate within the scope of the scheme;
 - Evidence of procedures to register and manage food safety auditors;
 - Documented arrangements with Accreditation Bodies to oversee the licensed Certification Bodies;
 - Defined requirements for audit management, including audit frequency, audit duration, audit reporting, management of certification, and data management
 - Evidence of how scheme owners communicate with GFSI
- **Part III: Scheme Scope and Key Elements.** Arguably the major change in Version 6 is the expansion of the document to cover primary production and processing in a more robust way, taking a scope specific approach to cover eventually all parts of the food supply chain. It has also been recognised that food safety requirements differ between the various parts of the food supply chain, and an exhaustive exercise was undertaken with sector-specific experts to define the food safety management system, Good Practice (GAP, GMP) and HACCP requirement in a number of industry scopes.

Figure 1 outlines the food industry scopes identified by GFSI. The first issue of Version 6 details the specific elements required for the following industry scopes:

- Farming of animals, fish, plants, grains and pulses;
- Pre-processing of plant products
- Processing of animal, plant, and ambient stable products

- Production of biochemical.

Scheme owners are now required to apply for recognition against one or more of the GFSI defined scopes and meet the detailed requirements for each scope included in their application.

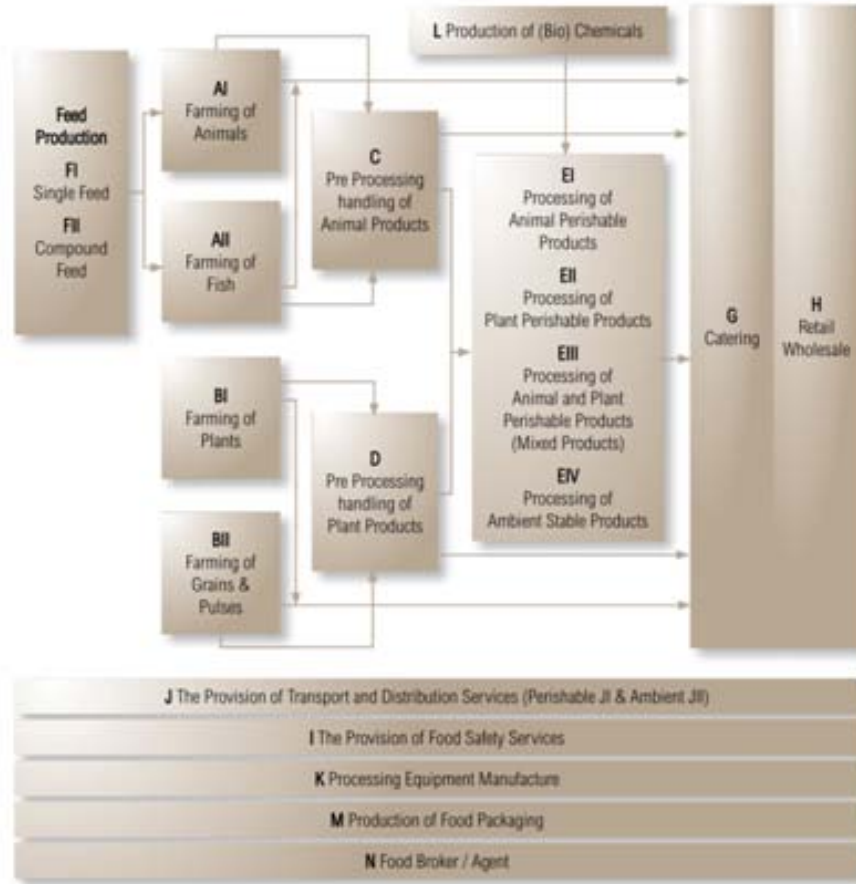


Figure 1

Over the next four years, working groups will be convened to specify the scope requirements for the recognition of food safety schemes for each of the remaining scopes not yet included in Version 6.

- Part IV: Glossary, lists the terms and definitions used in the GFSI Guidance Document

Transitional Arrangements

Applications for benchmarking to Version 6 commenced on 1st January 2011 and new schemes are encouraged to apply providing they meet all the new requirements. Applications to Version 5 are no longer accepted.

Existing schemes (a current list of GFSI benchmarked schemes is available on the GFSI web site www.mygfsi.com) are required to apply for re-benchmarking to Version 6 by 31st December 2011 or they will lose their GFSI recognition.

What are the Benefits of GFSI Recognition?

The Consumer Goods Forum is an independent parity-based consumer goods network of over 650 members. The Board of the Consumer Goods Forum comprises CEOs from 25 major international retailers and 25 major international manufacturers. The Global Food Safety Initiative is one of the key strategic pillars of the Consumer Goods Forum.

In 2000, when GFSI was formed, food safety was top of mind with retailers, manufacturers and consumers due to several high-profile recalls, quarantines, and the associated negative publicity. The CEOs of the major retailers and manufacturers agreed that consumer trust needed to be strengthened and maintained, while making the supply chain safer, through the harmonisation of food safety standards and driving cost efficiency.

Over the years, lead by a Foundation Board of senior industry personnel with a practical, commercial understanding of the application of food safety, and supported by scientific, academic and technical expertise, GFSI has built a considerable body of work on the requirements for food safety across the food supply chain.

The GFSI Guidance Document and benchmarking process is a key platform in achieving the GFSI goals, and Version 6 is an example of the collaborative approach used to improve the integrity and rigour of food safety management schemes.

GFSI recognition offers the industry the knowledge that benchmarked schemes are based on a foundation of contemporary food safety principles. It offers healthy competition between benchmarked schemes, and drives continuous improvement in the delivery of food safety standards.

GFSI provides a global network of recognised food safety standards that provide retailers, manufacturers and food service operators with confidence in sourcing, comparable audit approaches, and above all, safer food for the consumer.

Conclusion

The GFSI Guidance Document, Version 6 is a multi-stakeholder document that specifies the process by which food safety schemes may gain recognition and gives guidance to schemes seeking compliance.

More prescriptive, detailed, and transparent than earlier versions, Version 6 now differentiates between the key elements required for the production of safe food in different industry sectors. Definition of the benchmarking process has been improved and scheme governance and management requirements enhanced.

All food safety schemes currently recognised by GFSI are required to re-apply for benchmarking during 2011, and any new applicants will only be assessed against Version 6. The scheme's standard, auditor competence requirements, certificate audit programme and management system will be assessed against the requirements of Version 6 by the GFSI Benchmark Committee to verify compliance and, if successful, the scheme will achieve formal recognition by GFSI. Existing and new schemes that fail to meet the new criteria will not receive GFSI recognition.

Through this process, GFSI continues to provide a rigorous, scientifically based method that recognises competent food safety schemes and allows food businesses to select a food safety management system that not only fits their needs, but is recognised by retailers and manufacturers internationally, and has itself been exposed to a demanding peer assessment.



Certification and Accreditation Framework

Certification and Accreditation Framework

“Accreditation reduces risk for business and its customers by assuring them that accredited bodies are competent to carry out the work they undertake.”

~International Accreditation Forum website: www.iaf.nu

Introduction

Accreditation and certification are terms that are often used incorrectly within industry in general, and the food sector is no exception. In an industry that abounds with auditable schemes, standards, regulations, and requirements, it is little wonder that even the most seasoned professionals become confused by the jargon that surrounds the audit processes they undertake.

Throw in terms like ‘accredited certification body’ sometimes known as ‘accredited registrar’, and ‘conformity assessment’ and the confusion increases. Other terms such as ‘third-party audit or certification’ and ‘auditor competence’ are closer to home and more widely accepted, but the difference in rigour and outcome of a third party audit from a non-accredited audit agency as compared to an accredited certification body is not always understood. Similarly ‘management system certification’ and ‘product certification’ are also misunderstood.

In recent years third party food safety audits have come under critical scrutiny from the mainstream media, particularly in the US. Food plants with reportedly excellent ratings by these independent auditors have been linked to outbreaks associated with serious illness and death, and have subsequently been closed down by regulators. In most reported cases to date, these instances were one-to-one arrangements between suppliers and independent non-accredited audit agencies, without any oversight or recognition.

Accredited certification does not deliver a guarantee of food safety nor prevent food safety incidents. It provides a proven framework of checks and balances that significantly improves the rigour of the audit process and reduces the risk of food safety failures. Food businesses should not rely solely on third party audits to provide evidence of their food safety compliance. However, accredited third-party certification audits, if used correctly, are worthwhile tools for any food business seeking to implement and maintain behaviours and practices within their facilities.

So what does accredited certification mean, where does it fit within the GFSI benchmarking process and, more importantly, what significance does it have on the integrity and value of the food safety audit process?

The History

Accredited certification is not new and is not unique to the food industry. The International Organisation for Standardisation (ISO) is an international collaboration of national standards setting organisations. Since 1947, ISO has developed and published commercial standards, many of which have become law

and/or national standards in contributing countries. When GFSI introduced benchmarking of food safety management systems in 2001, there were numerous private standards, audit management schemes, and ISO standards that covered the food supply chain with multiple audits and varying degrees of diligence. GFSI recognised the credibility, rigour and consistency offered by the accredited certification system, and from the start applied the same principles to the GFSI benchmarking process. Schemes applying for benchmarking had to agree to operate according to the principles of ISO/IEC Guide 65, and include a standard that could only be audited by Certification Bodies accredited to ISO/IEC Guide 65. This has since been widened to include ISO/IEC 17021, supplemented by ISO/TS 22003 to ensure the approach is equivalent to that of ISO/IEC Guide 65.

Cutting Through the Jargon

Figure 1 (next page) provides a simple outline of the accredited certification framework as it applies to GFSI recognised schemes.

Starting from the bottom, a food business applies to a GFSI recognised scheme for certification and then selects a Certification Body (CB) to audit and certify the selected standard. CBs are sometimes referred to as 'Conformity Assessment Bodies' (CABs) or 'Accredited Certification Bodies', because they must, under the GFSI Guidance and scheme rules, be accredited to either ISO/IEC Guide 65, or ISO/IEC 17021 (with ISO/TS 22003) for the delivery of the particular GFSI recognised scheme being applied for.

Certification, according to ISO/IEC 17000:2004, is "third party attestation related to products, processes, systems or persons." What that means in food industry parlance, is the process by which CBs, based on conformity assessments (or audits), provide written assurance that an audited food business has identified all potential food safety hazards, implemented effective controls, continues to validate and verify these controls, and has a management system in place that conforms to the requirements of the scheme's standard.

The CB must also have systems in place to ensure the capability of all management, technical, and administrative personnel, and in particular the competence of auditors involved in the certification process. Auditors must be competent in food safety management as applied to the industry sector(s) they are auditing, and the requirements of the specific scheme.

For the GFSI recognised schemes, Accreditation Bodies, in turn, assess the Certification Bodies against one of two ISO standards : ISO/IEC Guide 65 or ISO/IEC 17021, supplemented by ISO/TS 22003.

The GFSI Guidance Document (version 6) gives the following definition of Accreditation:

"A process by which an authoritative body gives formal recognition of the competence of a certification body to provide certification services against an international standard."

Accreditation activities are conducted by Accreditation Bodies (ABs), which are not-for-profit organisations, either government owned or under agreement with government, charged with ensuring that participating Certification Bodies in the country are subject to oversight by an authoritative body. ABs may not be high profile in each country, but play a key role in the accredited certification process and

ensuring international consistency in conformity assessment. They include for example UKAS in UK, ANAB and ANSI in USA, RvA in the Netherlands, and JAS-ANZ in Australia and New Zealand.

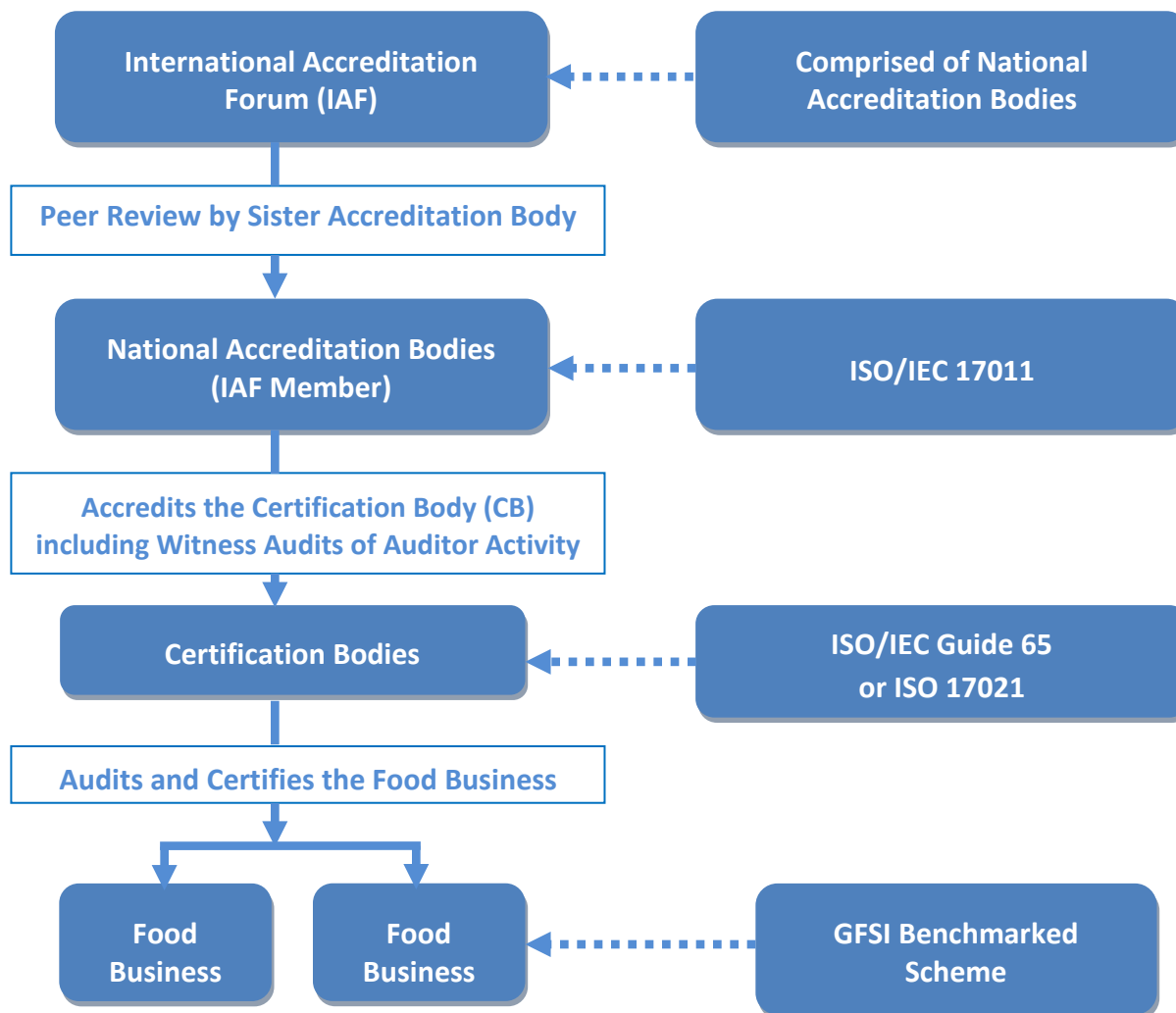


Figure 1

The International Accreditation Forum

Even ABs are not immune from further scrutiny. Sitting over the top of the accredited certification framework is the International Accreditation Forum (IAF). The IAF is the world association of conformity assessment Accreditation Bodies. Its primary function is to develop a single worldwide program of conformity assessment which reduces risk for business and its customers by assuring them that accredited certificates may be relied upon. The mechanism by which IAF implements its objective is the IAF Multilateral Recognition Arrangement (MLA).

To put it simply, the IAF helps to ensure that all ABs are following the rules of accreditation and applying the standards to affirm consistent delivery of the certification schemes. This is achieved by peer

evaluation to ISO/IEC 17011: 2004 – General Requirements for Accreditation Bodies Accrediting Conformity Assessment Bodies.

To assist in this process and ensure it applies to the food industry, GFSI has developed a set of specific requirements in relation to assessors carrying out assessment on ABs working with food safety schemes. Issued in 2009, this document is available on the GFSI site and has been integrated into the Guidance Document Version 6.

Why Two Accreditation Standards?

GFSI recognises two ISO standards for accreditation purposes. One is ISO/IEC Guide 65, and the other ISO/IEC 17021, supplemented by ISO/TS 22003. Both of these standards contain similar requirements for how a certification body must operate. They both address issues of preventing conflict of interest, managing customer information, properly qualifying personnel, auditor calibration, and many other aspects involved with the certification process.

Both ISO/IEC Guide 65 and ISO/IEC 17021/ISO22003, require the accreditation body to observe auditors in the field as well as conduct a detailed office review of policies, procedures, and document control. It is only after the successful assessment of auditors and the certification body operations that accreditation can be granted.

But there is a distinct difference between the two. ISO/IEC 17021 covers conformity assessment of ‘management systems’, and is applied in combination with ISO/TS 22003, which covers audit and certification of food safety management systems. However ISO 17021/ISO 22003 “does not attest to the safety or fitness of the products of an organization within the food chain” (ISO/TS 22003:2007). It is not product specific. ISO/IEC Guide 65, on the other hand, is concerned with verifying that particular products or services meet specified requirements.

The type and scope of GFSI benchmarked scheme selected, determines the accreditation standard which applies. The majority of GFSI recognised schemes fall under ISO/IEC Guide 65 accreditation requirements, whereas only two currently recognised schemes are management system schemes accredited to ISO 17021/ISO22003.

The Food Certification Process

So how does this impact on the certified food business? The food business generally does not need to have any contact with IAF or the Accreditation Bodies, but does need to know that there is a robust accredited certification framework behind the scheme, recognised by GFSI, that helps to protect the interests of the food business and the scheme owner.

For the most part, the only points of contact for the food business are the scheme owner and the Certification Body (CB). The points to consider are:

1. **Select the Right Scheme:** All GFSI recognised food safety schemes include a standard – which is the auditable set of requirements that is applied to the food business. The first step in the certification process is selecting the scheme with a standard that best fits with the products and processes of the business, and helps meet customer requirements.. This may be requested by a

retailer, food service business, or manufacturing customer, or may be to confirm the business's internal food safety protocols and controls. A list of GFSI recognised schemes can be found on the 'my GFSI' site at <http://www.mygfsi.com/about-gfsi/gfsi-recognised-schemes.html>. It should be noted that all existing schemes are required to re-apply to GFSI for re-benchmarking to the recently released edition 6 in 2011, before 31st December 2011.

2. **Select a Certification Body:** Each of the scheme owners maintains a list of accredited CBs that are licensed to certify to their standard. The Accreditation Bodies also maintain a list of accredited CBs. When selecting a certification body, it is important for food businesses to consider a number of aspects including availability of qualified auditors, regional presence, seasonality, scheduling, audit duration, and overall costs.
3. **Apply for Certification:** The certification process is essentially the same, irrespective of the scheme or CB selected. The process officially starts with completion of CBs application documents which allow the certification body to fully understand the scope of a facility's operations and the products to be covered by certification. It also becomes the basis of the contract between the CB and supplier, and is critical for calculating audit duration and proper assignment of an auditor with expertise in the appropriate food sector category(s).
4. **Scheduling:** The CB contacts the facility to schedule a mutually acceptable date for the certification audit. Most GFSI benchmarked schemes specify time limits within which certification and re-certification audits must occur to maintain certification. However, within these limits, the audit must be scheduled on a date that suits both the facility and the auditor, and within a peak production period.
5. **Certification Audits:** All food safety standards require an on-site third-party certification audit. Some schemes also require a document review prior to the certification audit. The role of the audit is to determine how well a facility identifies and implements food safety controls and complies with the requirements of the applicable standard.

Certification audits are always non-consultative, which means that the auditor is not permitted to instruct or advise the facility on how to meet requirements of the schemes. The auditor reviews HACCP plans, procedures, policies, physical conditions, and records and observes the implementation of food safety plans within the facility. Any non-conformances observed during the audit are documented in the audit report. At the conclusion of the audit, the facility is informed of all observed non-conformances.

6. **Closure of Non-Conformances:** To achieve certification the food business is required to take actions necessary to sufficiently correct any non-conformances noted during the audit, and to prevent their recurrence. Each certification schemes has unique time-line requirements for non-conformance closure. The CB reviews the evidence submitted and accepts the corrective actions if they are sufficient to resolve the noted non-conformance. If the submitted corrective actions do not sufficiently resolve the non-conformance, the CB rejects them, and the food business is required to re-submit within a specific timeframe. In some cases or as prescribed by the scheme, the CB can undertake a further site visit to verify closure of non-conformances. A certificate can only be issued when non-conformances have been appropriately addressed.

7. **Certification Decision and Issuance:** The auditor does not make the decision on certification. An individual within the CB, independent of the original site audit, makes the final determination on certifications based on a review of the audit report and evidence of close-out of non-conformances. Only after a successful certification decision can a certificate be issued. The entire process from the completion of the audit to the issuance of the certificate is typically about 45 days.
8. **Annual Recertification:** Each year a certified food business is required to undertake a recertification audit to maintain certification. The rules around the timing of this may vary based on a scheme's rules and procedures, but typically the recertification audit will take place very close to the anniversary date of their initial certification audit. Just as in initial certification audits, the facility must address non-conformances prior to being issued a certificate.
9. **Appeals:** A third party audit is a process of obtaining objective evidence of conformance or non-conformance to a specified standard. The auditor obtains objective evidence by observation, interview, and review of documented procedures and records. However there are occasions where food businesses do not accept the outcomes of the audit, feel the auditor was not objective, was superficial, or did not adequately understand the process or technology.

All CBs auditing GFSI benchmarked schemes are required to have a complaints and appeals process in place to deal with such occasions. Where a food business justifiably feels that the CB or its representative (i.e. the auditor) have not fulfilled their side of the agreement, the food business must first report it to the CB and work through their complaints and appeals process.

If it cannot be satisfactorily resolved at that level, it is then escalated to the scheme owner's complaints and appeals process. There are "checks and balances" procedures defined in the accreditation and certification framework supported by GFSI and the recognised schemes that addresses situations where there is misconduct on behalf of an auditor or CB,

Conclusion

The Accredited Certification framework is a tried and tested process that applies credibility and robustness to third party food certification audits. Put simply, it is a process by which Accreditation Bodies, who are themselves subject to peer review, test the competence of Certification Bodies involved in food safety certification. Certification Bodies in turn are licensed by GFSI benchmarked schemes to certify food businesses.

This process is continually under review and revision by GFSI to ensure fitness and appropriateness to food safety certification and the GFSI objectives.



Addressing Perceived Barriers to the Acceptance of Third Party Certification

Addressing Perceived Barriers to Acceptance of Third Party Certification

This paper will address the perceived barriers in relation to the acceptance of third party certification to GFSI recognised schemes. These include economic barriers and perceived barriers to trade for suppliers in emerging markets, as well as the cost of audits and the continued presence in the market place of multiple schemes. Other objections fall more into the area of 'overkill', such as certifying the effective implementation of HACCP principles and the occurrence of occasional product recalls, notwithstanding third party certification. Perceived barriers also exist around the whole area of private standards, impartiality, perceived conflicts of interest and whether government should be involved.

Economic Barriers

Implementation of the requirements of the GFSI recognised schemes is perceived as potentially time consuming and expensive. Companies have sometimes had to hire and train additional personnel to develop or modify existing food safety management systems as well as to oversee the implementation of existing and new systems. Audits to GFSI recognised schemes may last several days and involve personnel from multiple disciplines, potentially interfering with production. However, the goal is to enhance the food safety system and case studies have demonstrated overall cost reductions, through increased compliance. The consequences of failure to improve or enhance the food safety system are much more costly than the costs of achieving compliance with, and certification to, any of the GFSI recognised schemes. Certification to one of these schemes can open up new, global markets and also satisfy the specific requirements of customers. As recognition of certification to one of the GFSI recognised schemes increases, audit costs are reduced by avoiding multiple audits.

Implementing and executing a comprehensive and effective food safety system, as defined by any of the GFSI recognised schemes, may require additional personnel, depending on the company's current food safety culture and the management approach to food safety in general. However, having a comprehensive food safety system has been proven to deliver other operational benefits within a facility. These benefits include improved product quality, reduced recall costs and other costs of non-compliance.

Effective Implementation of HACCP Principles

Many companies applying for certification to a GFSI recognised scheme have been operating to the principles of HACCP for many years and do not necessarily believe they need third party certification. However, HACCP is not mandated or required neither in all food categories nor in all countries. Third party certification to a GFSI recognised scheme is a means of objectively assessing that effective HACCP principles have been adopted and verification that these principles are effectively implemented. Certification further validates that the plants comprehensive food safety system is controlling hazards pertinent to that facility, processes, and products.

Audits to GFSI recognised schemes provide assurance that any identified gaps in the food safety system are resolved by means of a corrective action plan before certification is granted by the accredited certification body.

Barriers to Trade in Emerging Markets

GFSI is the result of collaboration between some of the world's leading food safety experts from retailers, manufacturers and food service companies, as well as service providers associated with the food supply chain. Although the initiative was created in Europe, globally, companies have recognised the benefits of a harmonised approach to food safety certification. The leadership of GFSI represents food retailers, producers, manufacturers and food service companies from around the globe. However, the requirements of the GFSI recognised schemes are often perceived to be unreasonably demanding for the food industry in emerging markets, allegedly reducing trade opportunities for under-resourced companies and developing markets. Such schemes have been accused of going unnecessarily beyond Codex Standards, which provide a baseline for ensuring food safety. However, Codex Standards were designed to provide guidelines for developing countries to ensure equivalent food safety standards worldwide and careful consideration is given in Codex committees to ensure that such standards are achievable by all. GFSI recognises that some companies may experience difficulties in immediately obtaining certification due to a lack of resources, both financial and human. For this reason, the Global Markets Toolkit has been developed to address the issue through the development of a set of core competencies, thereby creating a path to accredited certification for suppliers based in emerging markets over a two to three year period. At the same time, the Food Safety Knowledge Network (FSKN) has been created to support the training and development of personnel working for these small and medium sized suppliers. Through this process, GFSI is building capacity in these markets not only to develop expertise within food companies, but also helping to create a pool of competent auditors and consultants to manage assessments. GFSI and participating food businesses are also piloting introductory food safety education and assessment programmes in developing markets. These innovative pilot programmes have proven very successful in many regions and certain governments have provided financial support for these programmes.

Finally, it should be noted that the key food safety elements of the GFSI Guidance Document are derived from Codex Principles. However, Codex was never intended to define food safety management systems that are needed to ensure continuous improvement.

The Cost of Multiple Audits

The implementation of GFSI recognised schemes does not necessarily eliminate multiple audits. Some suppliers may have customers who require additional amendments or may have their own standards and audit systems. The scope of GFSI recognition for schemes is specifically limited to food safety. By creating convergence between schemes through the benchmarking process outlined in the Guidance Document, the intent is to reduce the need for multiple food safety audits. There may still be a need for non-food safety assessments, such as food quality and ethical sourcing. As the GFSI approach becomes increasingly adopted by the food industry, an increasing number of companies will become aware of the benefits afforded by using third party food safety certification audits.

Private Schemes, Impartiality and Conflict of Interest

The schemes that GFSI recognises through the benchmarking process have been developed by the food industry, for the food industry, and this often leads to a perceived conflict of interest. However, great care is taken to ensure that all the processes facilitated by GFSI involve stakeholders from all along the food supply chain and there is also increasing involvement from regulatory and non-governmental bodies. In this way, and by seeking input from industry, academia and government, GFSI makes every effort to maintain transparency and diversity, and ensure that the interests of all are adequately represented as

the shared goal of delivering safe food around the world. All schemes currently recognised by GFSI have been developed using careful and deliberate steps to seek technical input and public consultation during their development and revision and it should be noted that all of these schemes are aligned with Codex principles. The accredited certification framework is also designed to address potential conflicts of interest through alignment with globally recognised standards, such as ISO Guide 65 and ISO 17021/ISO 22003. In addition, each GFSI recognised scheme contains programmes to ensure audit and auditor integrity through requirements for accreditation, training and witness auditing.

A company seeking certification pays for the audit, but the independent accreditation and certification framework endorsed by GFSI ensures that certification bodies remain objective. Failure to assess and audit in accordance with GFSI and the individual scheme requirements jeopardises the certification body's recognition by the scheme owner. In addition, some situations can result in a certification body losing its accreditation with the consequences of the loss of recognition by the scheme owner and / or of accreditation, potentially resulting in significant financial losses. Moreover, some national regulatory agencies have the authority to revoke recognition of an accredited certifying body, thus preventing their utility with the regulatory agency.

Government Endorsement

In recognition of the importance of public endorsement by regulatory bodies, certain schemes, such as CanadaGAP and Dutch HACCP, were developed with government support and regulatory oversight. GFSI recognised schemes are all based on the foundation of Codex principles in order to ensure a global and harmonised approach to the management of food safety risks. The Codex process involves the vast majority of governments around the world. Furthermore, third party certification is not intended to replace enforcement by the regulatory authorities of individual countries, but only to complement such enforcement and each approach (inspection and third party certification) has a role to play in a robust and effective food safety system, one enhancing the other.

In addition, the GFSI recognised schemes are based on the foundation of regulatory requirements and Codex principles. They are evaluated to ensure that their compliance programme verifies that companies are adhering to the food safety requirements of the regulatory authority with jurisdiction (country of origin and country of destination). GFSI recognised schemes are also flexible enough to address the rapidly evolving demands for food safety requirements globally.

There is no intention to replace regulatory inspections. However, effective third party certification can provide benefits to the official regulatory inspection process by increasing regulatory compliance, thus allowing reallocation of regulatory resources to programmes that further enhance food safety.

Auditor Competence and Capacity

Key to the success of GFSI is the audit performed by third party certification bodies. The integrity of the whole initiative is thus to a certain extent dependent on the competence of the auditors. There is a perceived shortfall in the number of experienced auditors, capable of performing audits in all categories of the food industry in many parts of the world. GFSI, therefore acknowledges that auditor capacity could be a perceived barrier to obtaining certification. However, as the demand for certification increases, the incentive to recruit and train additional and competent auditors will increase until it eventually matches demand. In addition, GFSI has created a Technical Working Group (TWG) to determine the necessary auditor competencies that are required to administer the GFSI recognised schemes, including sector knowledge, years of experience and personal attributes. The competencies will be defined and

incorporated into the GFSI Guidance Document by the end of 2011, thus improving the consistency and comparability in certification audit results from scheme to scheme with each scheme maintaining lists of recognised and licensed certification bodies capable of auditing to their scheme.

Will Zero Risk Ever Exist?

Third party certification does not provide an absolute guarantee of food safety and companies that have third party certification may indeed experience product recalls. Zero risk does not exist. Third party certification does not eliminate the risk of product defects or product recalls and there is currently no approach to food safety, including regulatory, which entirely eliminates the need for product recalls. Third party certification is just one tool among many designed to help manage food safety risks. All GFSI recognised schemes require preventive controls to be in place in order to manage food safety. Having effective preventive controls provides enhanced management of food safety risks.

Multiple Schemes

Many newcomers to the world of GFSI are confused by the multiplicity of the recognised and benchmarked schemes and often ask why a single, global scheme has not been developed in the interest of simplicity. The objective of GFSI is the delivery of safe food through continuous improvement of the schemes and reduction of cost throughout the supply chain. The reasons for continuing to recognise multiple schemes include maintaining options that allow for a focus on specific sectors and having a choice of schemes that best fit any given company's management approach. The recognition of multiple schemes also encourages healthy competition among the schemes themselves and between certification bodies, thereby creating an environment for the delivery of better services and ultimately competitive pricing.

The acceptance of one, global and harmonised food safety scheme would be difficult, due to the complexity of the global food supply chain, geographical variations, sector requirements and different food safety management strategies. Regardless of how many schemes are benchmarked to the GFSI Guidance Document, they are all equally recognised and accepted by GFSI. Each of these schemes provides an equivalent level of food safety assurance to the user.

Conclusion

Accredited third party certification is today the best available means of ensuring the supply of safe food to the consumer in our globally sourced, food system. Used in addition to regulatory measures, certification can be a powerful tool in overcoming trade barriers and ensuring market access for even the smallest of suppliers. GFSI programmes, including the benchmarking and recognition of schemes, are ongoing, as are other initiatives such as the Global Markets Toolkit, with the aim of ensuring that the perceived gap between developed and developing markets is bridged. Consultation with public and other authorities also remains vital in the pursuit of a safer food supply for everyone. The food industry and key stakeholders are increasingly recognising that accredited certification is a benefit.



Benefits of Third Party Certification

Benefits of Third Party Certification

Introduction

Accreditation and certification are proven concepts in many industries, including food, and they provide a framework for assessing the pertinence and compliance of food safety management systems. They are widely practiced and accepted in many parts of the world due to the benefits of the checks and balances applied at each stage in the process. They have strong verification and results based procedures. Moreover, they are steeped in an atmosphere of continuous improvement. In addition, many entities in many countries, particularly those in Europe, have made use of accredited, third party certification for the prioritisation of risks.

Governments and Regulators

Governments and regulators benefit from third party certification in as much as oversight is achieved without the use of additional publicly-funded financial and human resources, because it is funded by private industry. Certification results may thus be used by regulatory agencies as a tool to optimise the use of budgeted resources and to determine not only the frequency of their own audits, but also the areas to concentrate on during these audits. GFSI allows for consultation and access for representatives from the academic, institutional and governmental world, all actively participating and providing input into GFSI activities in their role as advisors to the GFSI Board. For each one of the GFSI recognised schemes there are, upon request, provisions for access by regulatory bodies to audit information and the certification results. Access by regulatory bodies may also provide additional private-sector benefits as described in selected government guidelines for improved access or speed of “May Proceed” rates for imported food shipments, particularly in the US.

Third party certification provides compliance with the requirements for a certification process including in the areas of facility application, certification, the recertification process and the withdrawal of certification. It also allows for compliance with generic government requirements for the attributes of a certification process.

Third party certification also has the benefit of transparency and, as driven by GFSI, aims at continuous improvement and flexibility in response to rapidly evolving market demands with the added advantage of audits being carried out on an annual basis and with the ability to modify contracts as a function of changes to the scope of production in a given facility. All GFSI recognised schemes also require corrective action plans as a follow up on non-compliances, and require a systems-based approach built on the HACCP principles, thus relying on prevention rather than reaction. Accreditation under ISO 17065 or ISO 17021/ISO22003 exists as a further safeguard for regulatory bodies.

Manufacturers

One major benefit to industry of third party certification under GFSI recognised schemes is the avoidance of duplication driven by the GFSI goal of ‘Once certified, accepted everywhere’. Certification to GFSI benchmarked standards provides substantial economic benefits through the avoidance of duplicate audit requirements by multiple domestic and international buyers with some manufacturers indicating that they had more than 15 to 20 audits per annum for multiple buyers under the former system of multiple audits and audit checklists. This was a waste of time and resources and caused a huge burden on suppliers.

Companies that have been certified to one of the GFSI recognised schemes have been independently assessed against a set of scientifically based food safety principles. The scope of the assessment covers food safety management systems, addressing product non-conformities, incident management, traceability, sanitation, hygiene, water quality, pest control, control of hazards and control of allergens among others. Verification that HACCP, GMP and GAP (if applicable) based food safety management systems are in use reduces the level of risk for both suppliers and importers.

Improved traceability and properly tested recall programmes increase a company's ability and capacity to manage these activities when necessary. Compliance with certification requirements can also lead to greater efficiency in the allocation of resources by private industry and financial savings due to reduced numbers of product recalls.

Reducing the audit burden and improving food safety management systems implemented in food production operations allows for greater cost efficiencies throughout the supply chain. Manufacturers are able to devote more resources and time to implementing benchmarked food safety and food quality principles and controls rather than spending it on preparations for repetitive and duplicative audits.

Companies that obtain third party certification have greater opportunities with the buying community thus providing greater market access for their products. In addition, GFSI managed pilot schemes for the education of individuals working at smaller suppliers in order to create a pathway to full certification for those supplier companies that currently lack adequate resources to attain full compliance with GFSI recognised schemes. This is an initiative being driven by the Global Markets Technical Working Group (TWG) for companies, and therein, also resides the Food Safety Knowledge Network (FSKN) aimed at the development and education of individuals working for those smaller suppliers. In turn, these programmes will help to provide enhanced market access at all levels.

Retailers, Food Service Operators and Consumers

The benefits of global convergence between GFSI recognised schemes and mutual recognition of food safety certification to retailers and food service operators conducting business and purchasing on an international scale are many with the growing harmonisation of certification for food safety based on food categories and processes. This is also leading to the efficient assurance of regulatory compliance for certification schemes in markets as diverse as the European Union, the Americas, Asia Pacific and the Middle East and Africa.

The optimisation of resource and time allocation for regulatory inspections and the verification of controls and management systems through a risk based approach means that all certified facilities have a risk based food safety system with its foundation in Codex principles or equivalent, science based principles, such as those of HACCP and the various ISO standards. These facilities are certified by accredited, third party certification bodies with further room for complementary recognition by governments of third party certification.

Unaccredited assessments or audits typically last between 1 and 4 days and focus on programmes, procedures and records. Their requirements are normally GMP and / or HACCP based and they are not globally benchmarked. However, they do provide a starting point for small enterprises. In comparison, third party certification audits against GFSI recognised schemes represent the advantage of being subject to benchmarking every two years as a result of revisions to the GFSI Guidance Document. They last on average between 2 and 5 days, including onsite assessment and report writing. They focus on policies,

programmes, procedures, records, implementation, continuous improvement, verification and validation. Corrective action plans for non-conformities are agreed with the certification body for the resolution of issues prior to the issuing of the certificate, which is the confirmation that all food safety related issues have been resolved. Verification is also present in the form of pictures and follow up audits and closure of outstanding issues is required within stipulated deadlines for certification or recertification to be granted.

The correlation between third party certification and recalls and withdrawals can be measured and other metrics, such as improvements to the food safety environment in local communities, worker protection and changes of attitude, behaviours or culture within a company that is certified, are also possible. Improvements to the food safety culture results in a top down and bottom up commitment to food safety and to continuous improvement. This can be communicated to external stakeholders and the pride associated with certification then often leads to a virtuous circle of reinforced training. This has also been demonstrated following the successful pilots of the Food Safety Knowledge Network (the programme referred to above and designed to assist in the training and development of individuals working for smaller suppliers in emerging markets).

Accreditation

Additional credibility for third party certification to GFSI recognised schemes is provided by accreditation bodies and the fact that GFSI is a signatory to an MLA with the IAF [these abbreviations should be spelled out], thereby allowing for peer assessment and cross frontier certification. Accreditation is also the validation that a certification body has the infrastructure, competencies and controls necessary to properly assess conformity and there is verification that a certification body does indeed comply with its own processes.

Certification

Third party certification identifies the risks within a company, validates its food safety management system and the processes in place to control these risks and has verification systems to ensure adequate controls. It focuses on policies, programmes, procedures, records, implementation, continuous improvement and verification and validation. Furthermore, certification bodies verify execution and compliance during the assessment or audit with the aim of assurance that the facility maintains its control measures in between annual audits for the purposes of recertification. Auditors working for certification bodies only audit to designated food sectors in which they have demonstrable experience and competence. Third party certification allows for corrective action to resolve non-compliances or non-conformities and provides a defined classification for these. Correction actions are planned and implemented prior to the facility receiving its certification or recertification.

Conclusion

For governments, third party certification, funded and managed by the food industry, provides a welcome framework allowing the risk-based reallocation of resources to areas perhaps requiring more focus. For manufacturers it helps to address the issue of reallocation of resources through avoidance of duplicative audits, and with the support of GFSI tools for suppliers and training, it can lead to enhanced market access even for the smallest of suppliers and, over time, to a virtuous circle of training and continuous improvement. For retailers and the ultimate consumer, there is the reassurance of a thorough verification having taken place against internationally recognised standards and the robustness is guaranteed by stringent and international accreditation procedures for the certification bodies carrying out those controls.