

Stakeholder Consultation - Implementing the GFSI conceptual framework for ‘The Race to the Top’

GFSI - April 2020
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1. Introduction

- 1.1. GFSI is inviting all interested stakeholders to comment specifically on four features of a plan ratified by the GFSI Board in February 2020 in Seattle, which will require fundamental changes to the way that GFSI works with its major stakeholders.
- 1.2. The conceptual framework forms part of an ambitious programme of modernisation of GFSI named '*The Race to the Top*' (RTTT). The RTTT is intended to address the specific challenges GFSI has been facing in relation to trust and confidence in GFSI certification outcomes.
- 1.3. The four specific features of this consultation were shaped with the support of our stakeholders, most specifically the IAF Taskforce [a group comprising representatives from accreditation bodies (ABs) and Certification Bodies (CB)s and Certification Programme Owners (CPOs)] who provided significant inputs between the GFSI Board meeting in Chengdu in October 2019 and our GFSI Board meeting in Seattle in February 2020.
- 1.4. The purpose of this consultation is to set out in detail the current conceptual framework as approved by the GFSI Board. We are seeking to gain feedback and insights on the framework itself from those stakeholders most impacted.
- 1.5. We welcome any views on how best to implement the proposed framework. We are also hearing stakeholder views as to the interoperability of each of the four features.
- 1.6. The specific questions GFSI would like your feedback on can be found in Appendix 1 of this document and we would ask you to respond to them by completing our survey in Appendix 1 and returning it to gsfibt@theconsumergoodsforum.com by noon CET on **18th May 2020**.
- 1.7. Please ensure that you read this document in its entirety before proceeding to provide your responses.
- 1.8. Please feel free to circulate this document to others within your organisation who you feel should also be consulted or who we may not have reached. A full list of respondent groups can be found below.

Who is this consultation for?

- 1.9. Certification Programme Owners (CPOs) who have certification programmes recognised by GFSI.

- 1.10. Certification Bodies (CBs) who deliver audits against one of the [GFSI-recognised Certification Programmes](#).
- 1.11. Accreditation Bodies (ABs) signatories of the IAF MLA (International Accreditation Forum Multilateral Recognition Agreement).
- 1.12. Regulators responsible for the implementation of national food control systems.
- 1.13. Organisations responsible for the design and delivery of robust education and Continuing Professional Development programmes (CPD).
- 1.14. NGOs and IGOs who have an interest in food safety, GFSI activities or any of the activities described in this consultation e.g. training organisations, professional bodies or capability building organisations.
- 1.15. Food Business Operators (FBOs) certified to/are on the pathway to certification with a [GFSI-recognised Certification Programme](#).
- 1.16. Trade Associations/ Bodies representing the food industry.
- 1.17. CGF Member organisations who are not currently represented on the GFSI Board.
- 1.18. Consumer groups.

Issue Date and Enquiries

- 1.19. April 2020. For all enquiries, please contact gfsibm@theconsumergoodsforum.com. Closing date for responses to the consultation: **Noon 18th May CEST**.
- 1.20. Please note any responses received after this time may not be considered.
- 1.21. Please note **we are not consulting** on the four elements of the conceptual framework itself (as they have already been ratified by the GFSI Board) we are consulting on insights and feedback from our stakeholders as to how the framework can best be implemented and what critical factors we will need to consider.

2. About this consultation

2.0. Over several decades, the world has seen numerous food safety crises in the headlines, eroding consumers' trust in the safety of the food they buy, the brands they love and even the food industry at large.

2.1 [The Global Food Safety Initiative](#) (GFSI) was created in 2000 to help address this global issue and is the ground-breaking initiative of The Consumer Goods Forum (CGF), a global industry network, working to support Better Lives Through Better Business. GFSI aims to build consumers' trust in the food they buy – no matter where their food has come from, nor where in the world they live – by improving food safety management practices.

2.2 GFSI has grown into a vast, global multi-stakeholder community. We enable the extensive collaboration that is so critical to ensuring a safe global food system, involving both the private and public sectors.

2.3. The GFSI community works on a volunteer basis and is composed of the world's leading food safety experts from retail, manufacturing and food service companies, including supply chain actors in all product categories, international organisations, governments, academia and service providers to the global food industry. Our vision is for safe food for consumers everywhere.

2.4. Over the past 20 years, GFSI has presided over a community which delivers food safety assurance through benchmarking and the harmonisation of food safety programmes which are recognised as meeting the GFSI Benchmarking Requirements. The GFSI eco-system relies on multiple actors playing multiple parts in delivering food safety audits and certification upon which the global food industry relies.

2.5 The original genesis of GFSI focussed on setting requirements for food safety globally in a non-competitive way. The [GFSI Benchmarking Requirements](#) provides a high-level framework against which individual food safety certification programmes can be assessed. In short, GFSI is responsible for the food safety '*what*' not the food safety '*how*.'

2.6 Over the past few years, trust and confidence in 3rd party certification to deliver food safety assurance has been challenged. The quality of the outputs of some audits leading to certification to a GFSI-recognised Certification Programme has been questioned. There has been

an understandable concern about the efficacy of audits and more specifically the competence of some food safety auditors themselves.

2.7 Linked to point 2.6 above it is important to underscore the incredible importance of the role that food safety auditors play in supporting GFSI, delivering trust and confidence in food safety standards globally and ensuring that we move closer to achieving our mission of safe food for consumers everywhere. Each and every element of the RTTT will be designed to supporting the development and sustenance of excellent food safety auditor professionals.

2.8 Consulting with strategic stakeholders, GFSI has recognised that the issues lie not just with the auditors but with the entire mechanism leading to certifications to a GFSI-recognised Certification Programme, and overseen by the CPOs, the CBs and the ABs.

2.9. In Chengdu, China in October 2019, the GFSI Board convened to discuss the on-going challenges which they felt were inherent in the quality of GFSI certificates. They shared industry data which highlighted stark contrasts between the quality of GFSI third-party audits and their own second-party food safety audits.

2.10 The GFSI Board concluded that despite best efforts to improve aspects of the GFSI ecosystem, trust and confidence in GFSI certificates was at an all-time low and something radical had to be done and at pace, to address the inherent audit outputs.

2.11. The GFSI team committed to developing and delivering a bold new vision designed to shape what was termed 'The Race to The Top' (RTTT) and at the following GFSI Board meeting in Seattle in February 2020 the GFSI Board unanimously voted in favour of an initial suite of measures specifically designed to improve the sphere of influence that GFSI had over its entire food safety certification and assurance system.

2.12. The RTTT is the sum total of multiple work streams and projects designed to ensure that there is a fundamental shift in culture from 'compliance being enough', to a new era and demands for 'continuous improvement' at all touch points within the GFSI sphere of influence – CPOs, CBs, auditors and the FBOs themselves.

2.13. The conceptual framework of GFSI’s modernisation combines to deliver a bold vision and to enable the RTTT. In broad terms, GFSI is moving to assume **explicit oversight for what good looks like in all aspects of the GFSI ecosystem.**

The conceptual framework includes the following elements;

1. Developing harmonisation and benchmarking requirements for providers of food safety auditor training and on-going Continuing Professional Development (CPD).
2. Moving to deliver a process of on-going assessment and continuous alignment to the GFSI requirements for CPOs.
3. Developing a collaborative approach to the management of Certification Bodies between CPOs, Accreditation Bodies and GFSI.
4. Developing a certificate platform - enabling access to certificate data of all FBOs certified to a GFSI-recognised Programme.

2.14 The vision depends upon breaking down the current silos where performance information is held. It requires an information infrastructure where information is input once, then made available to relevant stakeholders on a “need to know” basis. Centralisation of the information facilitates effective governance and protection of the information, whilst enabling GFSI to oversee and exercise control over all the factors which impact on the integrity of the GFSI benchmarking process.

2.15 It is important to note that the projects linked to the RTTT are not only confined to the four features set out in this consultation however those contained herein are those which require multi stakeholder participation and engagement.

2.16 In summary, the RTTT will require multi-stakeholder contributions and commitment to a new era of GFSI that is revolutionary in how it deals with the challenges we collectively face. This consultation marks the start of that process of change and we warmly invite you to participate and support us in its delivery. We are committing to not just delivering seismic improvements but ensuring that measurement improvements are at the heart of everything we and our stakeholder community are delivering.

Thank you for taking the time to participate. We look forward to receiving your contributions.

RTTT – Feature 1.

Developing harmonisation and benchmarking requirements for providers of food safety auditor training and on-going Continuing Professional Development (CPD)

3.0. By moving to deliver GFSI Benchmarking Requirements for auditor training and on-going CPD as set out in the plan to deliver the RTTT, GFSI plays to its technical and professional strengths and via the establishment of GFSI-recognised providers of food safety auditor training and on-going continuing professional development (CPD), further supports the professionalisation of food safety auditing as a career.

3.1. There is a need to facilitate the development of a distinct profession of food safety auditing to create parity of esteem with other auditing professions such as financial auditing. Currently, whilst the role of a food safety auditor is critical to the safety of the population, there is no recognised profession, leading to the twin issues of a lack of accountability and standards, and the lack of a visible and practical career path in food safety auditing for school leavers and university graduates, leading to shortages of suitably qualified and competent auditors.

3.2. This feature of RTTT will create the foundation documents of a professional framework, a competency framework, a code of practice, and a document defining what is expected of a food safety professional across all aspects of their activity including professional development.

3.3. Using these foundation documents, a road map will be created to boost entry into the profession at a variety of entry points and allowing prior learning and expertise to be certificated. All GFSI-recognised providers of food safety auditor training and on-going Continuing Professional Development (CPD), will be required to show how their provision onto the road map to maintain their recognition.

3.4. This recognition programme will be followed by a requirement that only auditors trained by such organisations and members of GFSI-recognised CPD programmes be employed by CBs to deliver audits against GFSI-recognised certification programmes. This will have the impact of fostering mutual recognition to reduce the training burden on auditors whilst increasing confidence in competence.

3.5. The establishment of a profession and clearly defined career routes within it based upon the road map will enable all stakeholders to promote food safety auditing as an attractive career. This will create a wider talent pool from which businesses can recruit auditors and this will further drive up the standards of auditing.

3.6. **Timeline:** GFSI will publish the requirements in February 2021, thus changing the CPO requirements in 2022 when GFSI-recognised organisations are available.

RTTT – Feature 2.

Delivering a process of on-going assessment and continuous alignment to the GFSI requirements for CPOs

4.0 Currently the level of GFSI oversight of CPO performance is undertaken in 2 ways; bi-annual desk top review and annual benchmarking visit by the benchmark leader and the GFSI technical team member.

4.1 The proposal is that GFSI has mechanisms to deliver continual oversight of CPO performance. This oversight will measure CPO performance against GFSI requirements for standard operating procedures (SOPs), KPIs to monitor performance against the SOPs, and mechanisms to address non-compliance issues and poor performance.

4.2 The CPOs will self-report their capability via a secure IT platform that will provide oversight facilities for GFSI.

4.3 The self-reporting by CPOs will include a requirement for CPOs to demonstrate root cause analysis of deviation and continuous improvement on performance.

4.4 The bi-annual desktop review and annual benchmarking visit by the benchmark leader and the GFSI technical team member will be replaced by a random sample of audits conducted by a GFSI technical team member, together with an annual review for all CPOs, which will combine on-line scrutiny with a more focused annual benchmarking visit.

4.5 **Timeline:** Self reporting requirements January 2021

RTTT – Feature 3.

Developing a collaborative approach to the management of Certification Bodies between CPOs, Accreditation Bodies and GFSI

5.0 GFSI is aware that the current monitoring activities of the CBs is undertaken by multiple actors – CPOs (GFSI via oversight of CPOs) and ABs.

5.1 Oversight of the CBs is currently undertaken in silos, with no one organisation sharing CB performance data with another making a cumulative and correlated assessment of CB performance impossible.

5.2 GFSI is moving to create a facilitated data exchange of CB performance information between all key performance oversight actors i.e. CPOs, ABs and GFSI to improve efficiency and efficacy of monitoring.

5.3 This collaborative monitoring activity allows CBs to showcase to all interested parties their combined excellence and also allows overseers to move to collectively identify poor performers.

5.4 This approach is designed to be collaborative based on agreed, common performance indicators – GFSI Benchmarking Requirements and accreditation criteria.

5.5 GFSI proposes a multi-stakeholder taskforce to deliver rigorous CB performance oversight which could include CB organisation representatives as well as GFSI-recognised CPOs and ABs via the IAF.

5.6 **Timeline:** The multi-stakeholder taskforce will be targeted to identify the proposed performance indicators by December 2020. GFSI will work to establish a collaborative platform by July 2021.

RTTT – Feature 4.

Developing a certificate platform - enabling access to certificate data of all FBOs certified to a GFSI-recognised Programme.

6.0. GFSI certificate data is currently held by CPOs and CBs i.e. GFSI has no access to information which would allow us to know which FBOs were certified to a GFSI recognised programme, how many there are at any given time, and where in the world they are.

6.1 There is an acceptance that building trust and confidence in GFSI certification is directly linked to greater transparency of certificate data.

6.1. GFSI is proposing the development of a central repository offering different levels of access to different stakeholder groups – GFSI team, Regulators, GFSI Board Member companies and potentially more broadly to Food Business Operators. These levels of access will need to be determined as part of this project in compliance with applicable regulation.

6.2. This repository represents a concerted effort to improve transparency and ease of access of certificate status data throughout the GFSI ecosystem. Transparency is a critical feature of building trust which stakeholders tell us is missing.

6.3. This repository will improve the ability of GFSI certified businesses to make themselves visible to the stakeholders they are seeking to engage with. Equally manufacturers and retailers looking to procure from GFSI certified suppliers will be able to do so with ease.

6.4. An intended outcome of this project is to support the ongoing development of Public Private Partnerships by enabling national regulators with responsibility for national food control systems a level of access to certification data to be determined.

6.5. The implementation of the repository would negate the current requirement for CPOs to provide GFSI with the quarterly manual declaration on certificate numbers, which, they have reported to GFSI, is resource intensive.

6.6. CPOs would still have the opportunity to validate any information used by GFSI for invoicing purposes.

6.7. **Timeline:** January 2021

Appendix 1.

Consultation on the GFSI conceptual framework – The Race To The Top

Name:

Role within organisation:

Name of your organisation:

Your organisation is:

- Certification Programme Owners who have certification programmes recognised by GFSI.
- Certification Bodies who deliver audits against one of the GFSI-recognised Certification Programmes.
- Accreditation Bodies signatories of the IAF MLA
- Regulators responsible for the implementation of national food control systems
- Organisations responsible for the design and delivery of robust education and Continuing Professional Development programmes (CPD)
- NGOs and IGOs who have an interest in food safety, GFSI activities or any of the activities described in this consultation e.g. training organisations, professional bodies or capability building organisations.
- Food Business Operators (FBOs) certified to a GFSI-recognised Certification Programme.
- Trade Associations/ Bodies representing the food industry
- CGF Member organisations who are not currently represented on the GFSI Board

Further Information:

- Please provide your comments in relation to each of the features of the GFSI conceptual framework below.
- Please note and as previously mentioned we are not seeking your views on whether the individual or collective features of this framework should be developed and implemented as that decision has been taken by the GFSI Board.
- GFSI is interested to receive your input/suggestions as to how each feature should be developed and implemented and which stakeholders should be involved.
- GFSI is particularly interested to hear from stakeholders as to the role they feel they can play in developing and implementing the conceptual framework.
- It is not necessary to provide feedback on all features of the framework if you do not think relevant to you or your organisation.
- Please complete and return to GFSI via gfsibm@theconsumergoodsforum.com by **Noon CET 18th May 2020**.

RTTT – Feature 1.

Developing harmonisation and benchmarking requirements for providers of food safety auditor training and on-going continuing professional development (CPD)

Word Count 200 words

RTTT – Feature 2.

Delivering a process of on-going assessment and continuous alignment to the GFSI requirements for CPOs

Word Count 200 words

RTTT – Feature 3.

Developing a collaborative approach to the management of Certification Bodies between CPOs, Accreditation Bodies and GFSI

Word Count 200 words

RTTT – Feature 4.

Developing a certificate platform - enabling access to certificate data of all FBOs certified to a GFSI-recognised Programme

Word Count 200 words