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Committee on Sanitary and Phytosanitary Measures

THE GLOBAL FOOD SAFETY INITIATIVE (GFSI)

Note by the Secretariat

The WTO Secretariat has received a communication from the Global Food Safety Initiative (GFSI), which is coordinated by the Consumer Good Form. In the context of the SPS Committee's discussions on private standards, the text of their communication is reproduced in this document for the information of Members and Observers.

GLOBAL FOOD SAFETY INITIATIVE

EXECUTIVE SUMMARY

Introduction

1. Global food trade is expanding, providing consumers with access to a wider year-round variety of foods at lower prices. Expanding trade has brought into sharper focus the divergence among countries' food safety regulations and standards. These variations may reflect differences among their populations' tastes and preferences, ability to produce safe food, and willingness to pay for risk-reducing technology. Building common ground for food safety regulation through public and private initiatives is helping to achieve the simultaneous goal of improving food safety and enhancing trade.

2. Food regulations are based on domestic law and practice. However, they also operate within an international framework of rules and agreements. This institutional framework used to be weakly developed and enforced in the past. In the last 20 years, however, the multilateral rules have become much more stringent on the development and use of standards.

3. Differences in food safety regulations and standards among importing and exporting countries can cause friction and even disputes that impede international food trade. Countries are, however, tackling food safety and trade issues by learning from each other's successes in managing food safety to narrow regulatory differences, collaborating to adopt common or international standards set by a third party, or reaching compromises on conflicting standards. Private food safety initiatives are also contributing to the resolution of differences across borders.

Overview of the Global Food Safety Initiative

4. The Global Food Safety Initiative (GFSI) is collaboration between some of the world's leading food safety experts from retailer, manufacturer and food service companies, as well as service providers associated with the food supply chain. It is coordinated by The Consumer Goods Forum, the only independent global network for consumer goods retailers and manufacturers worldwide.

5. In May 2000, following a number of food safety incidents, a group of international retailer CEOs identified the need to enhance food safety, ensure consumer protection and to strengthen consumer confidence. The GFSI is a non-profit making foundation, created under Belgian law.

6. These same CEOs launched the GFSI which sets requirements for food safety schemes through a benchmarking process in order to

- (a) improve cost efficiency throughout the food supply chain,
- (b) to develop mechanisms to exchange information in the supply chain,
- (c) to raise consumer awareness,
- (d) to review existing good food safety practices.

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

Governance and Structure

7. The GFSI governance process is vital in ensuring the fulfilment of the GFSI mission. The structure exists with the aim to facilitate the exchange of information and identification of best practice issues at an international and multi-stakeholder level along the entire supply chain. The GFSI Board members are drawn from major retailers, manufacturers and food service operators. The GFSI Foundation Board provides strategic direction and oversight of daily management of GFSI. The GFSI Foundation Statutes were revised in October 2008 to ensure that the key partners in the supply chain are equally represented in the decision making process of the Board, which will remain business-driven.

8. An Advisory Council composed of scientists, academics, non-government organization members and government members will provide further expertise to the GFSI Board in their decision making process on matters related to the mission, objectives and goals of GFSI. This body of experts was constituted in early 2010.

9. The GFSI Technical Working Groups, *Guidance Document Review*, *Global Markets and Regulatory Affairs and Communications* are individual working groups composed of retailers, manufacturers, food service operators, standard owners, certification bodies, accreditation bodies, industry associations and other technical experts.

10. The GFSI Stakeholder Group is an open, annual international forum, which creates an open dialogue on current and emerging food safety issues to identify top priority food safety issues as work items for consideration by the GFSI Board. The intention is to ensure that GFSI is run and managed by its members and is as inclusive and transparent as possible.

11. Each 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. The GFSI Board in turn provides the mandate of work items to the GFSI Technical Working Groups, 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 the recommendations on technical issues.

Mission and Objectives

12. Those involved in the GFSI share a simple aim: "Safe Food for Consumers Everywhere". The GFSI mission is simple but impactful for all stakeholders interested 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.'

13. The GFSI objectives are:

- promoting convergence between food safety standards through maintaining a benchmarking process for food safety management schemes,
- improving cost efficiency throughout the food supply chain through the common acceptance of GFSI-recognized standards by retailers around the world,
- and, providing a unique international stakeholder platform for networking, knowledge exchange and sharing of best food safety practices and information.

History of the Harmonized Approach

14. As mentioned, prior to the creation of GFSI in 2000, there was a proliferation of audit demands primarily from major buyers within the food supply chain. Typically 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.

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

16. GFSI proposed a method by which there could be a harmonized approach to the recognition of food safety standards and their supporting systems, firstly by drawing up a set of defined criteria to be incorporated within food safety standards, and secondly by establishing common procedures for the accreditation and certification bodies responsible for application of these standards (the GFSI Guidance Document). This approach, once in place, will have the significant advantage to allow a supplier in any country to commission a single audit regardless of the number and nationality of retailers it supplies and the results of the audit will be accepted by their customers.

Benchmarking

17. Within GFSI, benchmarking provides this mechanism for the recognition of food safety schemes and their supporting standards and is a "procedure by which a food safety-related scheme is compared to the GFSI Guidance Document to determine equivalence of the scheme to GFSI requirements". The process is carried out in an independent, unbiased, technically proficient and transparent manner. Benchmarking a scheme successfully means that all recognized schemes have a common foundation of requirements which should provide consistent results, in regard to the common requirements applied during the audit, but the benchmarked schemes cannot be considered as being fully equivalent to each other, as schemes differ in relation to their level of prescription and specific needs.

GFSI-Recognized Schemes and Relationship to Codex

18. All the schemes recognized by GFSI have been derived, over many years, from standards developed by individual organizations, e.g. retailers, industry sectors or certification organizations. The GFSI-recognized standards have their origins based on standards dating back to the early 1980s, with the major influence being the requirements specified by retailers on their own brand suppliers.

19. The GFSI-recognized standards, by their very nature, are written in differing style, but all 'amplify' or describe in more detail the requirements laid down in the Codex General Principles of Food Hygiene Code of Practice. These standards are revised and implemented more regularly than the Codex General Principles of Food Hygiene Code of Practice and therefore have attempted to address issues that are currently faced by the food industry; good examples of this are incident management, food defense and allergen management.

20. There are within all GFSI-recognized schemes standards, requirements above and beyond those laid down in the Codex General Principles of Food Hygiene Code of Practice, which are seen by the food industry as being important to food safety or highly desirable to ensure continuing compliance with requirements; good examples of these are requirements related to product

specifications, product analysis, purchasing procedures, internal audit and full product/ingredient traceability. These supplementary requirements, by their very nature, will add robustness and rigor to the base requirements of food safety principles and will provide additional confidence and verification of process.

21. Although it is very difficult to trace the origin of these standards, they all reflect the need for compliance to meet legal requirements and are based on HACCP principles, food safety management systems and prerequisite programs, such as Good Manufacturing Practices (GMPs). It must be appreciated however, that these standards were all based on best practices and therefore by inference can be traced back to the base requirements of Codex standards. As these standards were developed, there are a relatively small number of specific requirements that cannot be referenced back to Codex standards.

22. In 2009, GFSI commissioned a report to compare the GFSI Guidance Document Version 5, current GFSI-recognized schemes, and the Codex General Principles of Food Hygiene Code of Practice. The key elements defined in the Codex Code of Practice to control risk factors throughout the production of food are found in the GFSI Guidance Document and recognized schemes. This comparison document can be found at <http://www.mygfsi.com>. This comparison demonstrates a convergence between the schemes with a strong foundation in internationally recognized standards, based on science, developed by both industry and governmental bodies.



Figure 1: demonstrates what elements GFSI-recognized schemes are built upon, including the foundation of legal, regulatory requirements and Codex principles.

Benefits of Third Party Certification

23. There are benefits all along the supply chain in seeking certification as a means to demonstrate compliance with legal and industry food safety requirements, thus promoting customer confidence and openness to market.

24. There is strong evidence to show certified companies realize higher margins through efficiency savings resulting from the application of disciplines defined by of the scheme's standards.

Certified companies are also able to show equivalence of process across countries and continents therefore facilitating cross border trade.

25. Finally, requirements defined in GFSI-recognized schemes are accessible and shared by many, therefore for the buying community; GFSI-recognized schemes provide effective shared risk management tools for brand protection, improving consumer confidence, and product integrity. Recent developments have also indicated that certification can provide benefits for governmental bodies through the demonstration of compliance with legislation and companies' commitment to control and manage food safety risk.

Conclusion

26. The increasingly diverse tastes of consumers and the realities of the food supply chain have created a global food economy, where local ideas and food products are gaining international currency. Securing a global food chain requires a more thoughtful approach to how food businesses and governments look at ensuring food safety. Supply-chain collaboration and coordination in the development and implementation of third-party certification has taken on a new urgency and new focus. Third party certification can provide consistency, cost efficiency, less duplication, buying confidence and safe food for the consumer.
