

GFSI: GETTING STARTED

You've just been notified by your largest customer that in order to continue doing business with them you need to have a plan in place within three months to commit to a Global Food Safety Initiative (GFSI) scheme and become certified to that scheme within nine months. **What do you do? How do you get started? What will it take to complete this task? And how close are you right now?**

In general, food producers in the United States are very good at training their employees on the job, maintaining their facility in a hygienic manner, handling issues as they arise, and getting an incredible amount of high-quality product out the door in a timely manner. All of this is necessary to stay in business, and adhering to a GFSI scheme at first seems to get in the way. Food plants that are just getting started in GFSI often say, *"We can't allow this to slow us down, we are in business to produce food, not paper!"* and *"Why can't I hire someone just to track our food safety records for conformance to the standard?"*

Customers in today's industry expect and demand an elevated commitment to food safety and it does not appear these requirements are going away. GFSI has quickly entered our world of food production, transportation, and distribution. There is no easy button to press to make certification happen. In fact, most facilities describe their path toward certification as a lifestyle change. They also quickly realize that GFSI is a commitment of continual improvement that does not end.

SELECTING A SCHEME

The first order of business is selecting the right GFSI scheme for your facility. Even though your company may have several sites, GFSI certification is site specific, and management at each site will have to effectively implement policies, programs, and procedures to conform to the requirements of the chosen scheme, which is proven by properly maintained records.

Are my main customers suggesting one scheme over another?

GFSI's slogan "Once certified, accepted everywhere" reflects the truth that all approved schemes are benchmarked to the same requirements. While your customers can require that your food safety plan is certified to an approved global standard in order

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them, they can be an excellent source of information.

Many suppliers are also requiring the use of transportation and distribution companies that are certified to a global standard; otherwise it becomes your responsibility to ensure they have food safety systems in place.

Which standard is most applicable to my process?

Read the requirements of each standard to determine if any of them make more sense for your facility.

BRC – includes food safety, legality and product quality requirements. The standard has been described as prescriptive, meaning there are very particular requirements that don't always fit into all food processing categories. One advantage of this scheme is that it asks you to make decisions based on required risk assessments.

SQF Level III – includes food safety, legality, and product quality requirements. It has also been described as prescriptive. The challenge is that there is more overlap in the requirements, but an advantage is that it gives easier step-by-step instructions that facilities can use to build policies and procedures.

SQF Level II – includes prerequisite programs, HACCP, and legality, but not product quality. The food safety clauses are the same as Level III. An advantage of this certification is that it allows the facility a food safety certificate up front and allows it to use its food safety expertise to address product quality and advance to Level III at a future date.

FSSC 22000 – Includes food safety and legality, but not product quality. This scheme comprises ISO 22000 Standards for Food Processing. To be certified, a facility must also adhere to the requirements of the PAS 220 or 223 (Packaging), which are addendums to ISO 22000 that address prerequisite programs. The advantage of this scheme is that facilities must have food safety systems based on ISO Standards allowing some flexibility as to how they build their programs. It also requires that records provide proof that they are doing what they say they will.

to continue business with them, they cannot disqualify you based on the scheme chosen. Keep in mind however, that they might not accept SQF Level II and require you to be certified to SQF Level III or BRC, since Level II only addresses food safety (prerequisite programs, HACCP, and legal requirements), not product quality. If your customer also deals with several other suppliers, they might encourage one scheme over another so they do not have to deal with several schemes.

What schemes are my main suppliers using?

It is becoming more and more common for producers to mandate their suppliers get certified in order to remain on the approved supplier list. It might be a good idea to look at the standard to which your competitors or suppliers are certifying. If you have a partnership with

DETERMINE YOUR NEEDS

What level is my current food safety plan?

Infant – I really don't have a food safety team that is experienced in identifying hazards and ensuring there are proper prerequisite programs in place to control each hazard.

Teenager – I have a food safety team that seems to understand HACCP, but it does not have the experience to really use HACCP as a tool to improve food safety.

Adult – Our food safety team really understands what HACCP is and knows how to use it to identify and control food safety issues.

The purpose for assessing your food safety level is to determine if you need a GAP Assessment or if you are ready for a pre-assessment audit. GFSI schemes are based on ISO methodology of Quality Management and a competent HACCP Plan.

WHAT IS A GAP ASSESSMENT VS. A PRE-ASSESSMENT?

A GAP Assessment is a consulting exercise for senior management, the food safety leader, and the food safety team (FST) as they build their programs. The GAP identifies areas of the current food safety plan that do not conform to the requirements of the selected scheme, and gives practical advice for conformance. Another big part of the GAP is explaining the intent of the requirements so they make sense to the FST. The consultant who performs the GAP cannot be the same person who performs the certification audit for the facility.

A pre-assessment audit is normally performed just as a real audit would be. All of the company information and the scope of the audit should be identified at the start of the audit, and the assessment should score any nonconformities as major or minor; SQF also scores Opportunities for Improvement (OIP). This allows the facility to determine if it is prepared for certification. The auditor does not give advice to the facility on best practices for becoming conformant, as this is normally the same person who will come back at a later time to perform the full audit. If the auditor did provide conformance guidance and later returned to perform the

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certification audit, a conflict of interest would arise. He would be auditing his own work, which is inappropriate.

GAP ASSESSMENT PREPARATION

Food facilities usually spend a significant amount of time and money on the implementation of a GFSI scheme. A large portion of time is involved in assembling and training the food safety team to meet the expectations. The better the FST is prepared before the GAP assessment, the more effective it will be.

Make sure the scheme you choose is one to which you can commit. All the schemes are written by teams of extremely smart people that know what it takes to implement a food safety system. Even though every facility has its own system, by committing to a GFSI scheme you are committing to each and every requirement written in that standard. This means you cannot choose to not conform to specific clauses you do not like.

Commit the right people to go through the GAP Assessment with the team. Know and understand that a GFSI scheme is not just a QA function. When you read and understand what is being required, you quickly realize these schemes demand equal input and output from operational management and QA management.

Assign job responsibilities for a food safety leader(s) and a food safety team. Although it is most common to select the leaders from the QA department, it is not required. It takes a strong leader to lead an effective team. This person could be from production, sanitation, warehousing, maintenance, purchasing, or human resources. Keep all employees in mind as you make this decision. The same attributes that make a good FST leader usually make good team members. Make sure to commit time for the team to be part of the GAP Assessment. The training they will receive will measurably impact the effectiveness of the food safety plan.

Write a policy statement that is in conformance with the standard. All the schemes require commitment from senior management that is spelled out in a company policy and effectively communicated to all employees. Make sure



IF YOU ARE UNDER PRESSURE TO GET CERTIFIED TO A GFSI AUDIT KEEP IN MIND THAT THE PROCESS NORMALLY TAKES 6 TO 12 MONTHS.

your policy statement includes each of the commitments required.

Identify food safety objectives (FSO) and product quality objectives (PQO). You don't have to have them finalized beforehand, but you should at least know what an objective is, and have an idea of what you can use. Each FSO and PQO should be measurable and the information should be easily placed on a chart or graph to identify if the objective is in the acceptable range. An FSO or PQO should be in an acceptable range when things are going very well in the facility.

Conduct HACCP refresher training for the food safety team. All GFSI schemes emphasize an effective HACCP plan. Any refresher training that can be provided to the HACCP team will better prepare them for food safety implementation. HACCP needs to be understood as a tool to identify possible hazards that might affect the products the facility produces, and provide appropriate controls that are effective at reducing the hazards to an acceptable level of risk. In other words, an effective HACCP plan is a method of decision-making based on pre-described criteria, otherwise known as a decision tree.

All the schemes that require quality objectives use HACCP methodology to identify the specific conditions which cause product to be out of specification. As these conditions are identified, controls have to be put in place to prevent these conditions from occurring.

PRE-ASSESSMENT PREPARATION

A pre-assessment should be viewed as an actual audit, and the FST leader should prepare for it as he or she would an actual audit. New for 2012, BRC has announced an enrollment audit, which

is a formal pre-assessment audit. This audit opens and closes with official senior management meetings and is a scored audit. If the facility passes this audit with an A, B, or C grade, it gets certification upon completion of any corrective actions within the allowable timeline. If it does not pass, it is not under the normal 30-day window of completing all corrective actions.

All written procedures and documents should be available for the audit, as well as the records that support these procedures. The auditor will go through the audit checklist and give responses to any non-conformity (minor-major-critical) that he or she finds. The auditor cannot give suggestions for the plant to fix any issues, but all issues that are effectively corrected before the audit will not score against the facility when it has its certification audit.

SUMMARY

If you are under pressure to get certified to a GFSI audit, keep in mind that the process normally takes six to 12 months to accomplish. Determine the audit scheme to which you will commit, and get copies of the standard. Nominate a food safety team and assign a team leader. Provide refresher HACCP training for the team.

Visit the scheme website and select your certification body, which is the company that will perform your audit. Have your food safety team go through the entire standard at least once to gauge where you are at in preparation for the audit. Start assigning tasks for each team member to complete and make sure you document all the changes that you make to your quality management system. **AIB**

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