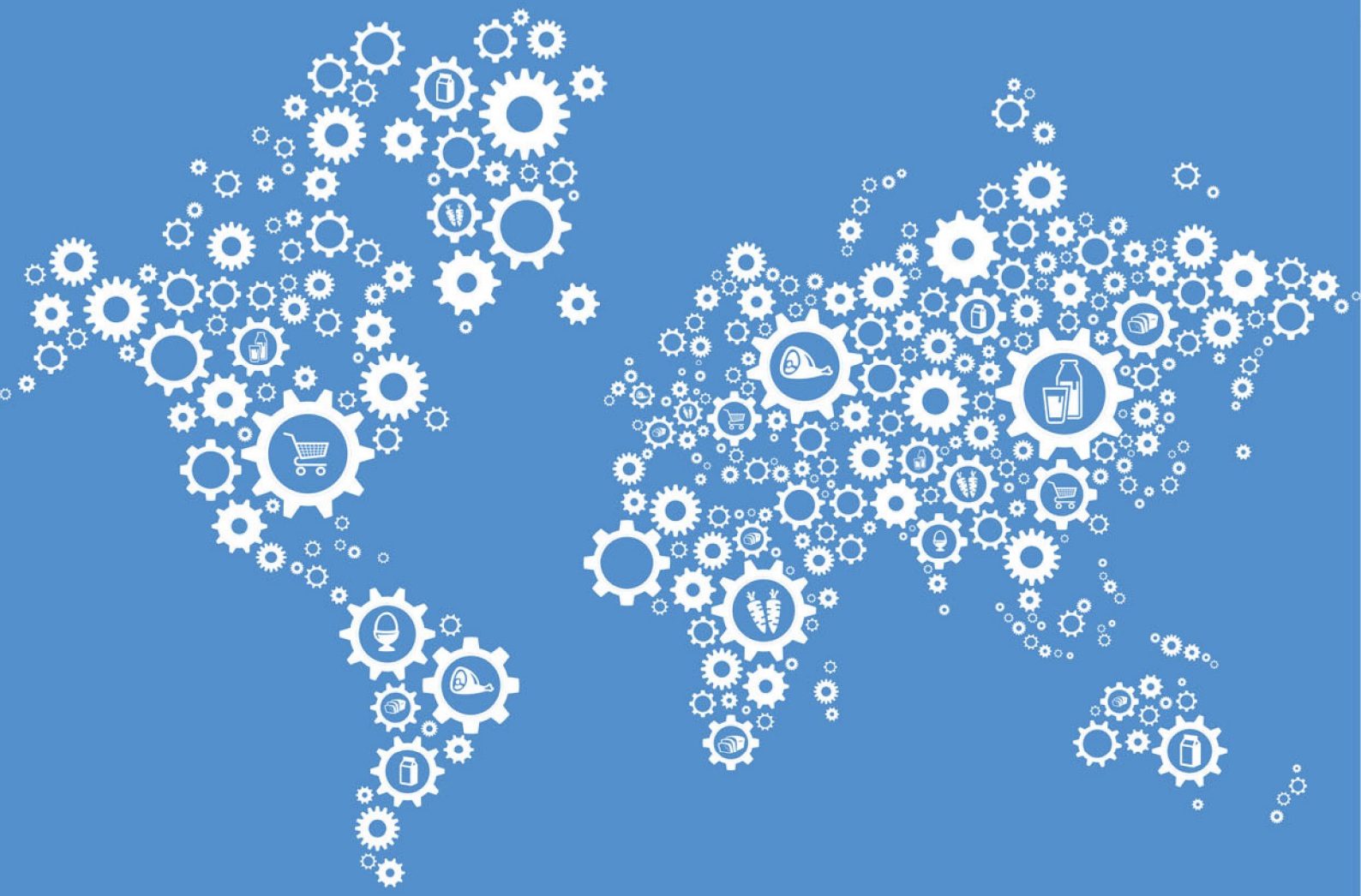
GFSI GLOBAL MARKETS PROGRAMME

PRIMARY PRODUCTION PROTOCOL - 2ND EDITION



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1. INTRODUCTION

1.1. This document

This protocol has been developed to guide companies through the steps of the Global Markets programme. It provides guidance for assessment against the Basic and Intermediate Level food safety requirements to attain the goal of reaching full certification to a GFSI recognised scheme. On a practical level, it sets out an overview of how to register for the programme, which documents are to be used at which stage of the process, and the steps which involve certification bodies or assessment service providers. The protocol should be used as an indicative user guide in relation to the following four key phases of the Global Markets Programme:

1. **Self Assessment:** A self-assessment by the Primary Producer against Basic and/or Intermediate Level Checklist to allow the Primary Producer to decide its entry level to the programme. Subject to the outcome of the self-assessment, the Primary Producer should pass to either phase 2 (Basic Level Assessment), phase 3 (Intermediate Level Assessment), or phase 4 (certification against a GFSI recognised scheme).

(2) Assessment with Assessment Provider:
Basic Level: An unaccredited assessment of a Primary Producer is carried out by an external assessor against the requirements specified in the Basic Level Checklist.

(3) Assessment with Assessment Provider:
Intermediate Level: An unaccredited assessment of a Primary Producer is carried out by an external assessor against the requirements specified in the Intermediate Level Checklist.

(4) Certification against a GFSI recognized scheme:
The official accredited certification against one of the GFSI recognised schemes.

1.2. Mission statement

A tool for Primary Producers to drive the continuous improvement process in food safety management systems, achieving food safety requirements in a phased approach and ultimately gain certification against one of the GFSI recognised schemes.

1.3. Scope

The scope of the Primary Production Programme is the Farming of Plants and the farming of Grains and Pulses. Scope extensions will, where appropriate, be made available on www.mygfsi.com.

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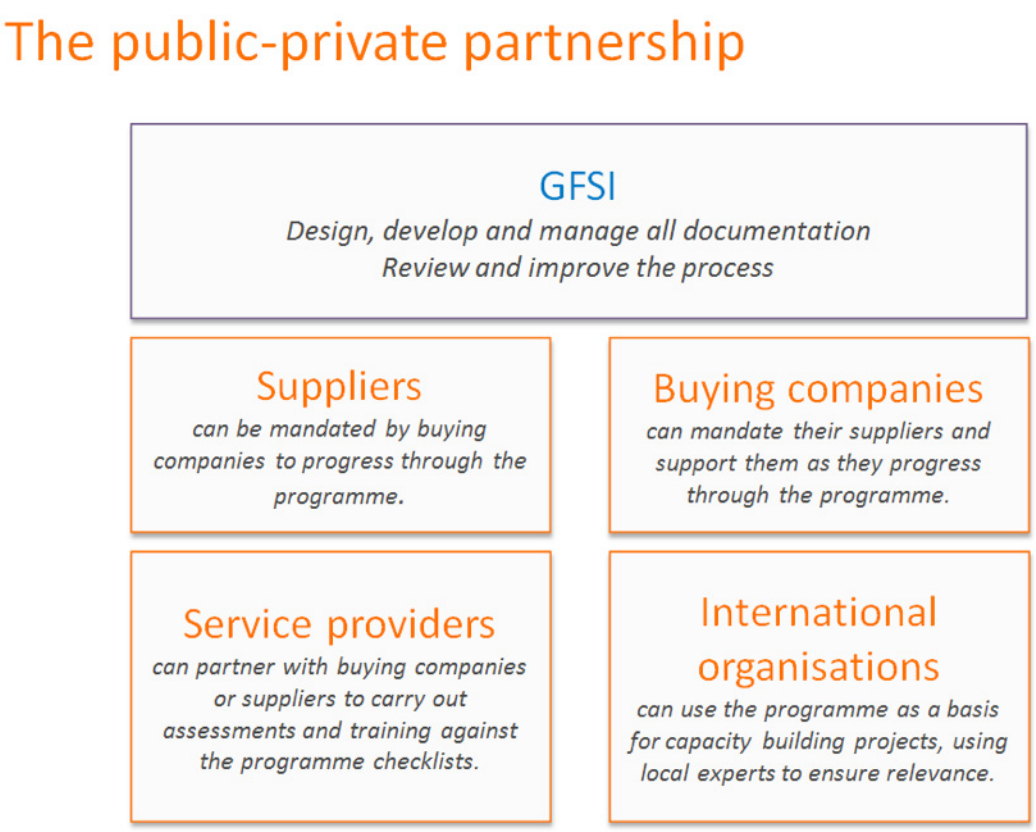
2. GFSI OVERVIEW

2.1. The role of GFSI in the Global Markets Programme



These entities may work individually or collaboratively, depending on their strategy.

- A Buying Company may work with an Assessment Provider to evaluate their Suppliers.
- An International Organisation may be mandated to work in a country, engaging with local Buying Companies to build capacity in collaboration with local Assessment Providers

2.2. GFSI Global Markets Programme: Document Plan

Global Markets Programme Primary Production: The document plan

Protocol
Programme structure with description
of progression through its phases.

Training and competency framework
Provides guidance on training to companies, training providers and learners.
Includes a framework of competencies mapped against the checklist.

Checklist: Primary production
Basic and Intermediate levels
for primary production

User guidance
Supplementary information:
- ✓ What does it mean?
- ✓ What do I need to do?
- ✓ What will the Assessor check for?

This Protocol has been developed to guide companies through the steps of the Global Markets Programme.

- It provides guidance for assessment against the Basic and Intermediate Level food safety requirements.
- It provides a description of how to register for the Programme, which documents are needed at which stage of the process and how to work with Service Providers.
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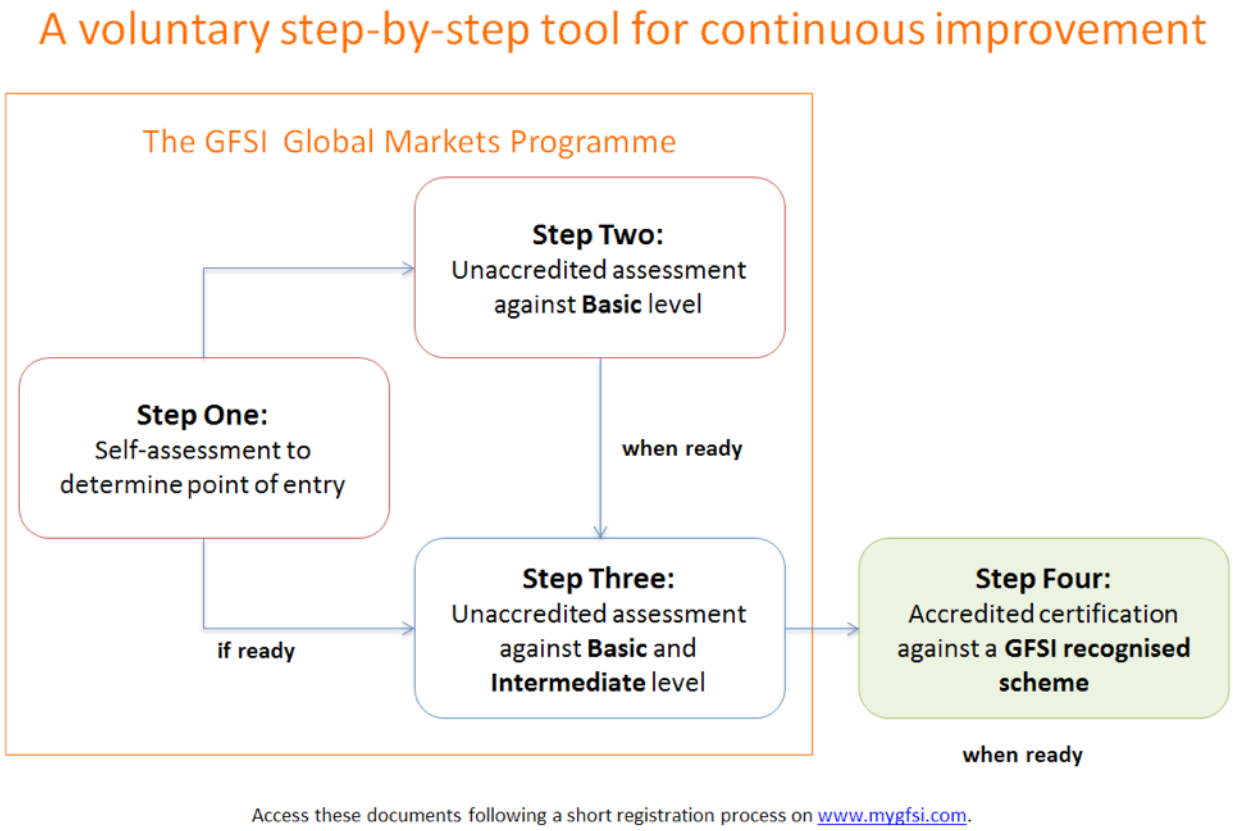
2.3. The pathway to certification



Access these documents following a short registration process on www.mygfsi.com.

Step 1 - Self-Assessment: Depending on the outcome of the self-assessment, the business should pass to Step 2 (Basic Level), Step 3 (Intermediate Level) or Step 4 (Certification against a GFSI recognised scheme).

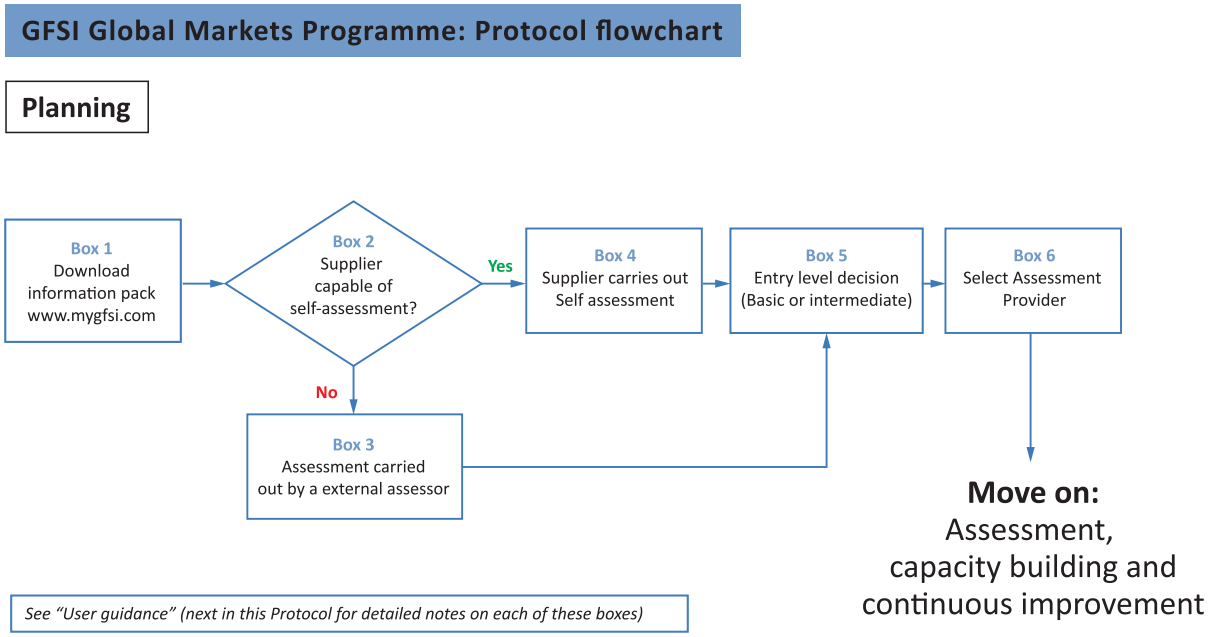
Step 2 - Assessment Basic Level: Focuses on whether the supplier can show that required practices are in place and actually performed.

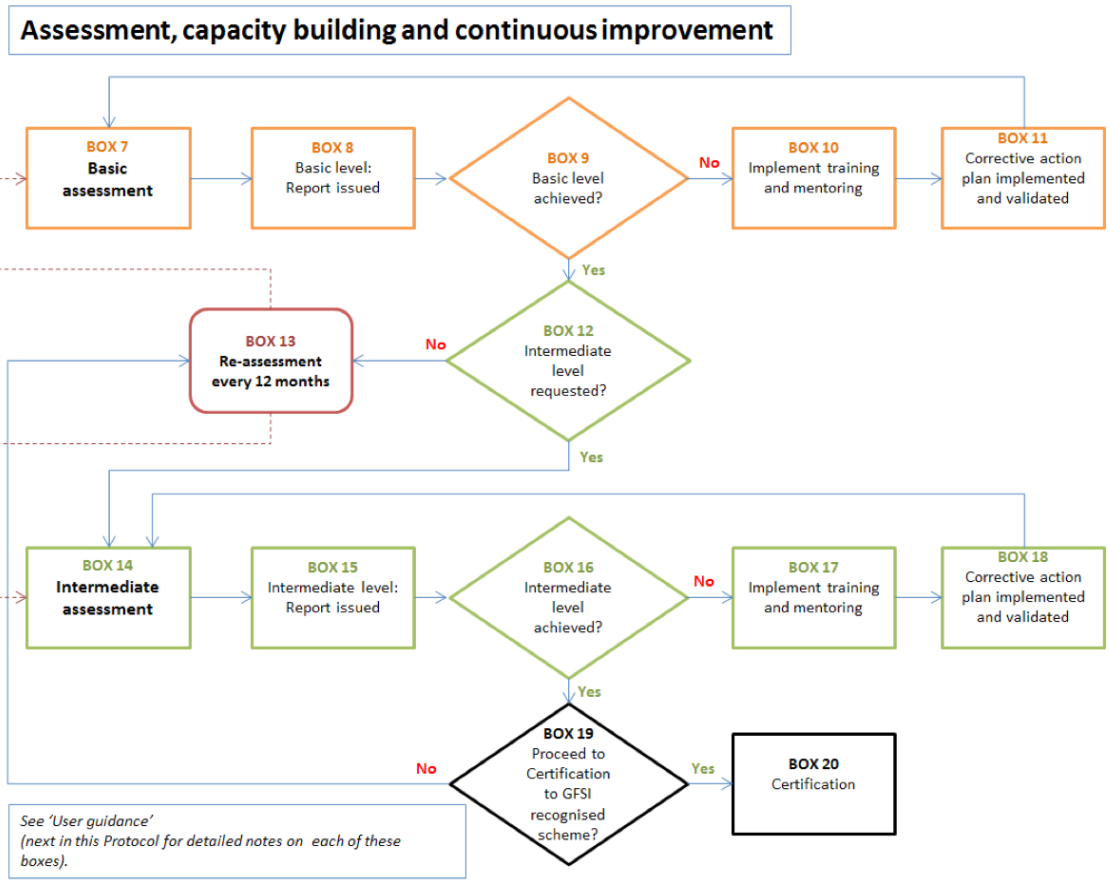
Step 3 - Assessment Intermediate Level: Focuses on whether the supplier has the procedures and record-keeping in place.

Step 4 - Certification against a GFSI recognised scheme: The official accredited certification process.

3. PROCESS

3.1. Flowchart





3.2 User guidance

Box	Description	User guidance
		Planning
1	**Download toolkit (www.mygfsi.com)**	All the necessary information on the GFSI Global Markets Programme is available and can be downloaded free of charge from www.mygfsi.com following a short registration process. *Click on 'Global Markets Programme', then click on 'Toolkits'* Based on the level of understanding of this Programme (such as the concept of certification, variations in Buying Company requirements and international regulations), additional review of these documents should be carried out to ensure understanding. **Documents in the toolkit for Primary production:** • Welcome & How to Use this Toolkit. • The Protocol: a description of progression through the Programme. • The Training and Competency Framework: guidance on training for companies. • The Checklist for Basic and Intermediate assessments: an Excel template containing the checklist, user guidance, glossary, report form and Assessor guidelines. • The checklist in printable format, to be used for easy reference and self-assessments.
2	**Supplier capable of Self-Assessment?**	Does the Supplier need external help to perform the self-assessment? Credibility is dependent on the expertise of the individual leading the self-assessment. The supplier must determine whether they have the technical capability to conduct a credible self-assessment, based upon their level of expertise. If not, they may engage an external assessor or other external qualified expert to conduct the assessment. The decision may be taken by Supplier and/or Buying Company.
3	**Assessment carried out by an external assessor.**	The external assessor will undertake the assessment against the Basic or Basic and Intermediate Level Checklist. This step provides the Supplier with a gap analysis and the basis for a remedial action plan.

Box	Description	User guidance
Assessment, capacity building and continuous improvement		
4	**Supplier carries out Self-Assessment**	A voluntary self-assessment by the Supplier against Basic and/or Intermediate Level Checklist. The scope of the self-assessment shall be the entire facility and all the manufacturing processes. This step provides the Supplier with a gap analysis and the basis for a remedial action plan.
5	**Entry Level decision (Basic or Intermediate)**	The Self-assessment allows the Supplier and/or the Buying Company to decide the relevant entry level to the programme; whether the Supplier should pass to either Basic or Intermediate level assessment.
6	**Select Assessment Provider**	Once the self-assessment has confirmed the relevant level for the Supplier, an Assessment Provider can be selected. There are two possible options for the selection of Assessment Providers: • A Certification Body that is accredited to deliver a GFSI recognised food safety management scheme. • An Assessment Provider that has been specified by the relevant Buying Company.
7	**Basic assessment**	The Assessment Provider will carry out an assessment against the Basic level checklist. • Duration: recommendation 1 working day, depending on size and complexity of operation, with any exemptions from particular requirements previously approved between the Supplier and Buying Company. • Time spent in production areas shall be no less than 65% of total assessment time, which includes interviews and observations. The Assessor is also encouraged to review documents within the production area rather than the office. • The Assessor will establish the Supplier's compliance against each clause. If nonconformances are identified, one of the following outcomes will be assigned: critical, major, minor and conform. • Critical nonconformances will result in an assessment failure. • Definitions of these outcomes are included in this protocol (see 3.3) and in the checklist. • This assessment does not consider outcomes of the self-assessment undertaken in Box 3 or 4.

8	**Basic level: Report issued**	The report format, with scoring option, is included within the Excel checklist (Box 1). It is automatically generated from the Assessor comments against each clause. This report shall identify the status of the Supplier against the requirements listed in the checklist. It shall provide a description of nonconformances needing correction with timescales. The report shall be locked by the Assessment Provider who shall also retain the original copy. The locked report shall be provided to the User.
9	**Basic level achieved?**	Basic Level can only be achieved once all major nonconformances have been verified by the Assessor as being closed. In the event of critical nonconformances being raised during the assessment, a full repeat assessment should be carried out. The requirements of Buying Companies will vary because there is a customised report which allows them to identify certain clauses which they do not require. This may mean that certain clauses may be exempted. However, assessments are to be undertaken against all clauses. All nonconformances shall be reviewed and closed at the next assessment.
10	**Implement training and mentoring**	If Basic level has not been achieved, training and mentoring may be required to be undertaken by the Supplier to ensure understanding of requirements and implementation of suitable and sustainable actions. Comprehensive guidance is provided in the "Training and Competency Framework" (see Box 1).
11	**Corrective action plan implemented and verified.**	The Supplier should implement agreed corrective actions to enable progress to achieve Basic Level. Verification shall be by the Assessment Provider. Timelines may be set by the Assessment Provider with reference to the Buying Company and the Supplier. This will vary according to whether the nonconformance is critical, major or minor.
12	**Intermediate Level requested?**	The Programme is designed to allow a Supplier to move progressively towards achieving full certification. However, for certain markets and according to Buying Company requirements, some Suppliers may stay at Basic Level.

13	**Re-assessment every 12 months**	To maintain Basic or Intermediate Level, an assessment should be repeated at least every 12 months.
14	**Intermediate assessment (same as Box 7)**	The Assessment Provider will carry out an assessment against Basic and Intermediate Level checklists. • Duration: recommendation 1 working day, depending on size and complexity of operation, with exceptions approved between both parties (Supplier and Buying Company) • Time spent in production areas shall be no less than 65% of total assessment time, which includes interviews and observations. The Assessor is also encouraged to review documents within the production area rather than the office. • The Assessor will establish the Supplier's compliance against each clause. If nonconformances are identified, one of the following outcomes will be assigned: critical, major, minor and conform. • Critical nonconformances will result in an assessment failure. • Definitions of these outcomes are included in this protocol (see 3.3) and in the checklist. • This assessment does not consider the self-assessment undertaken in Box 3 or 4.
15	**Intermediate level: Report issued (same as Box 8)**	The report format, with scoring option, is included within the Excel checklist (Box 1). It is automatically generated from the Assessor comments against each clause. This report shall identify the status of the Supplier against the requirements listed in the checklist. It shall provide a description of nonconformances needing correction with timescales. The report shall be locked by the Assessment Provider who shall also retain the original copy. The locked report shall be provided to the User.
16	**Intermediate level achieved? (same as Box 9)**	Intermediate Level can only be achieved once all major nonconformances have been verified by the Assessor as being closed. In the event of critical nonconformances being raised during the assessment, a full repeat assessment should be carried out. The requirements of Buying Companies will vary because there is a customised report which allows them to identify clauses which they do not require (exemptions). However, assessments are to be undertaken against all and exempted clauses.

17	**Implement training and mentoring (same as Box 10)**	If Intermediate level has not been achieved, additional training and mentoring may be required to be undertaken by the Supplier to ensure understanding of requirements and implementation of suitable and sustainable actions. Comprehensive guidance is provided in the "Training and Competency Framework" (Box 1).
18	**Corrective action plan implemented and validated. (same as Box 11)**	The Supplier should implement agreed corrective actions to enable progress to achieve Intermediate level. Validation shall be by the Assessment Provider. Timelines may be set by the Assessment Provider with reference to the Buying Company and the Supplier. This will vary according to whether the nonconformance is critical, major or minor.
19	**Proceed to Certification to GFSI recognised scheme?**	The Programme is designed to allow a Supplier to move progressively towards achieving full certification. However, for certain markets and according to Buying Company requirements, some Suppliers may stay at this stage.
20	**Certification**	All the necessary information on how to achieve certification to a GFSI recognised scheme is available and can be downloaded free of charge from www.mygfsi.com.

3.3 Nonconformance Definitions

Background:
The Assessor will classify nonconformance as Critical, Major and Minor. This will directly impact the site's result whether 'pass/fail' or 'score' option is chosen by the 'Buying Company' reviewing the assessment report.

Critical Nonconformance – Unacceptable.
Affects food safety or regulatory compliance directly.
A finding is rated Critical when the factors related to that requirement are not met and as a result the product will be unsafe and/or does not meet regulation. *Note: A Critical Nonconformance will result in a failed assessment.*

Major Nonconformance – May affect food safety.
A finding is rated Major when the factors related to that requirement are not met and as a result the product may be unsafe or present an increased food safety risk.

Minor Nonconformance – Is not likely to affect food safety.
A finding is rated Minor when the factors related to that requirement are not met and as a result the product is not likely to be unsafe or present an increased food safety risk.

Conform – Fully meeting a requirement.

Not Applicable (N/A)
When the Assessor decides a specific requirement is not applicable for a company, the assessor shall mark as "N/A" and provide a short explanation/justification in the comments section.

3.4 Exemptions

- This worksheet option is provided for use by the Buying Company only.
- If no exemption is selected then the Assessor must answer all questions.
- Due to variations in legislation, for certain international markets there are Checklist Items that may be exempted by the Buying Company.
- If an exemption is selected, the Item will be highlighted in grey in the Excel Checklist. The assessor will be advised that the item has been exempted and should not make any decisions in Column D.
- The scoring system shall be adjusted accordingly.

3.5 Scoring system

- All major and minor non-conformances are listed in the "Summary and Report" section of the Checklist.
- Criticals count as a 100 point deduction, Majors as 10 points and Minors as 2 points.
- There is a calculation against the number of clauses assessed to provide a numerical point score, not a percentage.
- In the event of a Critical or excessive Majors, the score can be zero.
- Unless set by the Buying Company, there will be no 'pass/fail' except in the event of a Critical nonconformance.
- The Excel assessment form has been automated using Excel formulae to deliver this system.
- The Excel Checklist document also provides a Conformance Overview worksheet which shows against which items nonconformances have been identified during the assessment.

3.5.1 Frequently Asked Questions: Scoring system

Q1	Why is there a zero score when a number of the elements have been marked as compliant?
A1	This is not a percentage system. When this system was defined by the Technical Working Group two things were agreed: The importance of a major nonconformance (10 points) must be stressed with a factor of 5 times more than a minor (2 points). Any clause in Basic or in Intermediate can be found to have nonconformance classified by the Assessor as critical, major and minor. Hence, when deductions exceed the allowance of the scoring system, it is possible to get down to a zero score during the assessment at a production site with multiple problems. It is also possible to get to zero with just one critical. The scoring system does not allow for a negative score.
Q2	When I'm being assessed for intermediate, I can see that all of Basic is also assessed. The scoring system seems to allow me to pass Intermediate and fail Basic. How can this be correct?
A2	First of all, the concept of 'pass and fail' is decided by the Buying Company. The two levels are scored separately. The only way to achieve Intermediate is to be compliant at Basic level. In the event that you 'pass' Intermediate and fail Basic, you will not have achieved Intermediate level, which requires compliance at both. However, there is a reverse situation where you pass Basic but are found not to be compliant at Intermediate. Decisions on how such situations are to be managed by the Buying Company.
Q3	Do I have to use the scoring system?
A3	We asked users what they thought of the previous approach. The key learning was that for entry-level suppliers 'failure' resulted in demotivation. Therefore, this new scoring system is an optional extra for Buying Companies. They may decide not to switch on this functionality. For those that decide not to use the scoring system, they will also have the colour coded conformity overview.

4. PRIMARY PRODUCTION REVIEW 2017

2ND EDITION – CHANGE SUMMARY

This part of the document has been prepared to inform practitioners about the changes that they will find in the documents for the Second Edition of the primary production scope for the Global Markets Programme.

4.1 Background

The GFSI Global Markets Programme seeks to build food safety capacity for small and/or less developed businesses due to one or more of the following challenges: size, lack of technical expertise, economic resources or nature of the work. The Programme is open access and is not accredited. There is no certification.

The GFSI Global Markets Technical Working Group has concluded its mandate to revise the primary production scope, comprising the protocol, checklist and the training guidance and competency framework. Stakeholder review and a number of pilots were included in the revision process. This document summarises the resulting changes between First and Second Edition

4.2 Protocol: Second Edition

- There is recognition that the Programme has become a "pathway to market access and certification" rather than a "pathway to certification." The consultation process has shown that for many businesses with local supply chains and customers, unaccredited Basic or Intermediate level will be adequate. However, major suppliers and all those involved in export should aspire to achieve certification to a GFSI recognised standard.
- The flowchart that guides users through the Programme has been simplified with new user guidance developed for assessors to drive consistency.
- In the First Edition, a number of clauses had been pre-positioned as immediate 'major' nonconformances.
  1. All pre-positioning has been removed.
  2. Every clause would be assessed by one of these: Meets requirement (Conform), Minor, Major and Critical.
  3. To move up from 'Basic' to 'Intermediate,' a Supplier must have closed any Major NCs, verified by their Assessor.
- There are new definitions of nonconformance:
  1. Critical Nonconformance - Affects food safety or regulatory compliance directly.
  2. Major Nonconformance – May affect food safety.
  3. Minor Nonconformance – Is not likely to affect food safety.
  4. Conform – Fully meeting a requirement.
- The scoring system has been developed to allow for flexibility and adaptation in different markets. Buying Companies may choose to use it or not. Unless set by the Buying Company, there will be no 'pass/fail' except in the event of a Critical nonconformance. Customisation options in the checklist allow the Buying Company to turn on the scoring system and to set a pass score if required.
- Due to variations in legislation, for certain international markets there are Checklist Items that may be exempted by the Buying Company.

4.3 Checklist: Second Edition

Note to Practitioners: The checklist is not a standard, there is no audit process or auditors involved and the listed items are to be assessed, not audited. There is no central record keeping. No certificate can be issued because there is no accreditation process for the Assessors.

- In general the language has been thoroughly reviewed to make it more comprehensible and accessible also for suppliers that have no experience with food safety assessment or certification.

- Comprehensive user guidance has been developed to explain to assessors and individuals in businesses what each requirement means, against the following questions:
  1. What does it mean?
  2. What do I need to do?
  3. What will the assessor do?

- Supplementary guidance has been developed by offering a glossary of technical terms, with references to other sources of information.

- The worksheet, which has a good level of functionality, has comprehensive advice in a worksheet titled: "How to use this document".

- Basic requirements focus on making sure the supplier know what to do and has practices in place. Intermediate adds requirements relating to systems management such as setting up procedures and keeping of records.
- From Basic to Intermediate: moving requirements up:
  1. Traceability: added Intermediate section (system related requirements).
  2. Corrective Action: added Intermediate section and moved records and documented procedure to Intermediate level. Renamed Basic section to "Corrections" to underline the practical meaning of the Basic section.
  3. Specifications: renamed to Customer Food Safety Requirements and moved to Intermediate level.
  4. Food Safety Incident Management: added Intermediate section and moved procedure to Intermediate level. Renamed Basic requirement to "Food Safety Incident Response" to underline the practical meaning of the Basic section.
  5. Animal control: took out the Intermediate section (requirement for maps and detailed records of animal control inspections).
  6. Cleaning and Disinfection: requirement split into Basic (practices) and Intermediate level (procedures, training).
  7. Propagation Material: moved requirements to Intermediate level.

- From Intermediate to Basic: moving requirements down:
  1. Plant Protection: moved to Basic the requirement regarding the person preparing the mix.

4.4 Training and Competency Framework: New document

This framework has been developed to provide guidance on good practice for delivering training for primary producers that are implementing the GFSI Global Markets Programme.

The document is in two sections:

- Guidance on the development and delivery of training. This defines the roles and responsibilities of companies, training providers and individual learners in the training and learning process, as they relate to the Global Markets Programme.

- The competencies required to achieve the GFSI Global Markets Programme Basic and Intermediate Levels.

4.5 Detailed clause overview: Edition 1 versus Edition 2

Basic: Edition 1		Intermediate: Edition 1	
A: Food Safety Related Elements			
B.A.1	Record keeping		
B.A.2	Traceability		
B.A.3	Corrective action		
B.A.4	Specifications		
B.A.5	Food Safety incident response	I.A.5	Food Safety incident management
		I.A.6	Purchasing
		I.A.7	Self-assessment
B: Food Safety of GAP			
B.B.1	Personal hygiene		
B.B.2	Site history and site management		
B.B.3	Animal control	I.B.3	Animal Control
B.B.4	Cleaning and disinfection		
B.B.5	Water usage	I.B.5	Water usage including produce handling
B.B.6	Propagation material		
B.B.7	Fertilizer use	I.B.7	Fertilizer use
B.B.8	Plant protection	I.B.8	Plant protection products
B.B.9	Harvesting		
B.B.10	Produce handling	I.B.10	Produce handling
		I.B.11	Waste and pollution management
C: Food Safety Hazards			
B.C.1	Control of food safety hazards	I.C.1	Control of food safety hazards
		I.C.2	Food defence

Basic: Edition 2		Intermediate: Edition 2	
A: Food Safety Related Elements			
B.A.1	Record keeping		
B.A.2	Traceability	I.A.2	Traceability
B.A.3	Corrections	I.A.3	Corrective action
		I.A.4	Customer food safety requirements
B.A.5	Food Safety incident response	I.A.5	Food Safety incident management
		I.A.6	Purchasing
		I.A.7	Self-assessment
B: Food Safety of GAP			
B.B.1	Personal hygiene	I.B.1	Personal hygiene
B.B.2	Site history and site management		
B.B.3	Animal control		
B.B.4	Cleaning and disinfection	I.B.4	Cleaning and disinfection
B.B.5	Water usage	I.B.5	Water usage including produce handling
		I.B.6	Propagation material
B.B.7	Fertilizer use	I.B.7	Fertilizer use
B.B.8	Plant protection products	I.B.8	Plant protection products
B.B.9	Harvesting		
B.B.10	Produce handling	I.B.10	Produce handling
		I.B.11	Waste and pollution management
C: Food Safety Hazards			
B.C.1	Control of food safety hazards	I.C.1	Control of food safety risks
		I.C.2	Food defence

Appendix

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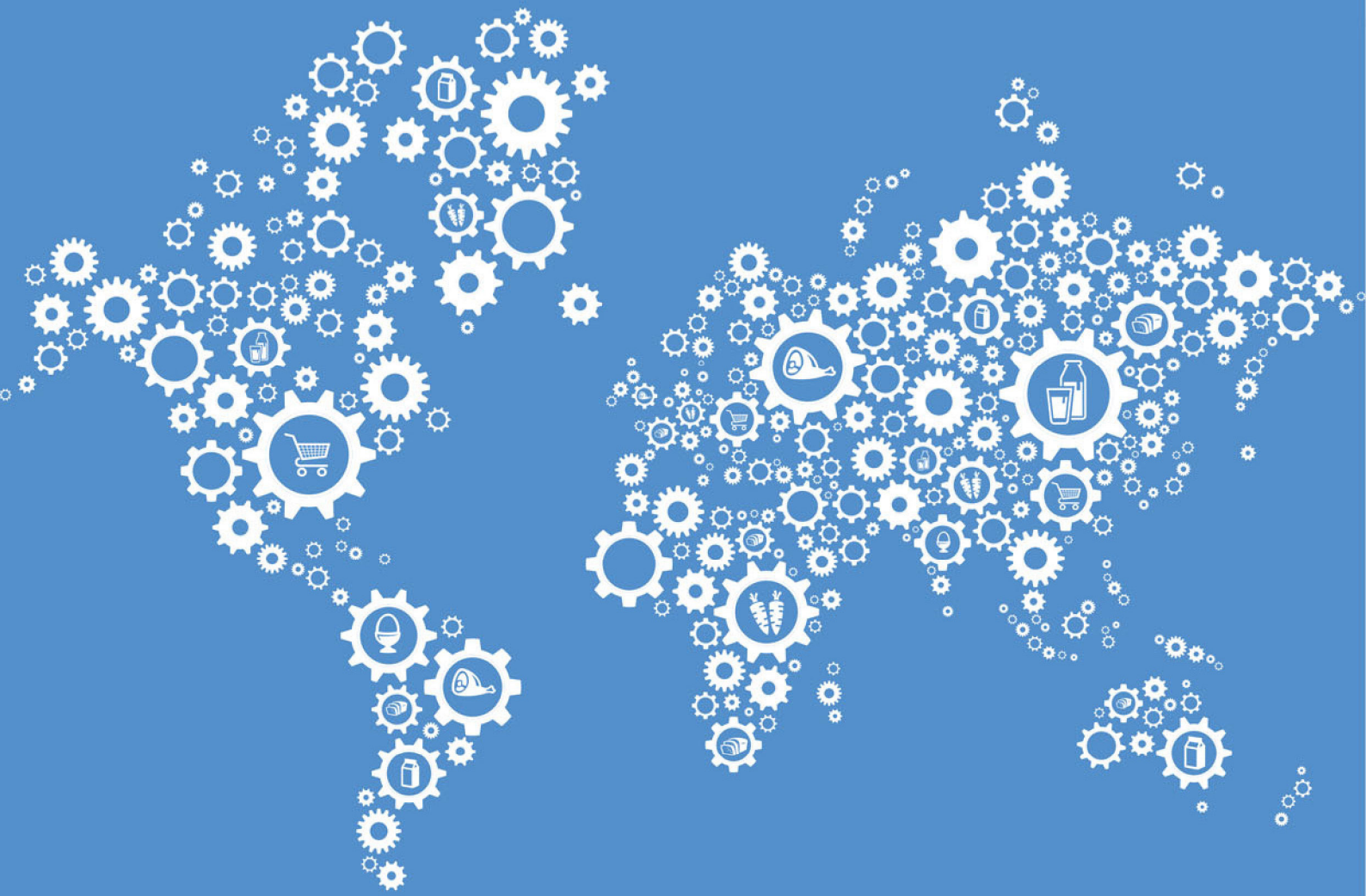
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