

CODEX ALIMENTARIUS COMMISSION



Food and Agriculture
Organization of the
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Organization

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CODEX COMMITTEE ON FOOD IMPORT AND EXPORT INSPECTION AND CERTIFICATION SYSTEMS

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THE IMPORTANCE OF GUIDANCE FOR REMOTE AUDIT AND VERIFICATION IN REGULATORY FRAMEWORKS: AN INDUSTRY PERSPECTIVE

(Submitted by The Consumer Goods Forum)

1. Introduction

Evidence-based Codex guidance is critical to the effectiveness of food safety world-wide. On behalf of the Consumer Goods Forum, GFSI is committed to playing its part and is keen to make a practical contribution to the development of guidance for remote audit and verification in regulatory frameworks.

Prior to the Covid-19 pandemic, competent authorities, and representatives of the food industry, including GFSI, had identified the need to consider what role Information and Communication Technologies (ICT) could play in the audit and verification of food safety systems around the world. Specifically, GFSI had been looking at the potential use of ICT in third party food safety audit protocols.

Covid-19 was undoubtedly a catalyst worldwide to hasten these considerations and GFSI, amongst others, came under considerable pressure to adopt and accept the outcomes of fully remote audits.

There was a dearth of evidence to support such a shift at a time when it became obvious that a range of practices were emerging from both within the food industry and competent authorities to provide assurance through virtual means.

2. Collecting the evidence

In response to these circumstances, GFSI initiated an initial call for evidence over the period October 2021-May 2022 to assess the impact of Version 2020 of its benchmarking requirements among the beneficiaries and users. GFSI received over 760 responses including more than 400 from food business operators (FBOs).

From January 2020, 47 per cent of FBOs reported that they had experienced a fully remote GFSI recognized blended audit versus 79 per cent who had not ever experienced one prior to that date. 73 per cent of the FBO respondents reported that the use of ICT in audits for remote assessment purposes was important.

48 per cent of these said that the use of ICT will have a positive impact on food safety outcomes, while 16 and 23 per cent of FBO respondents said that the use of ICT will have a negative or no impact on food safety outcomes respectively.

The results from this initial survey demonstrated clear pros and cons in the use of ICT in food safety audits.

Pros	Cons
<ul style="list-style-type: none"> ▪ Auditor Preparedness: Requires more preparation from the auditor 	<ul style="list-style-type: none"> ▪ Critical Factor Assessment Lacking: Visual, hands-on assessment not possible. Food safety and company culture difficult to assess and encouraged for manufacturers and farms
<ul style="list-style-type: none"> ▪ Less audit fatigue: Requires less logistics, travel and audit time 	<ul style="list-style-type: none"> ▪ Technology Investment Required: Technology not fully developed or compatible with manufacturer capabilities. Cost incurred
<ul style="list-style-type: none"> ▪ Environmental Impact: Less travel = less environmental impact 	<ul style="list-style-type: none"> ▪ Corporate IT Policies: Confidentiality and interoperability with exchange of data
<ul style="list-style-type: none"> ▪ Costs: Less costly 	<ul style="list-style-type: none"> ▪ Human resources: Lack of skill and training and transition to use of ICT
<ul style="list-style-type: none"> ▪ Flexibility: Maximizes flexibility for short harvest windows 	

These findings pointed to the need for consistent and clear protocols and a level of competence by each party to participate in either full or partial remote audits. Further, having a defined scope and established processes for both remote and on-site assessments was also essential to maximize the benefits of such arrangements.

The survey also found that blended audits were demonstrably efficacious if used sensibly. In particular, remote audits were effective for documentation review and preparation by the auditor prior to arrival on site. Further, on-site audits provided a clear advantage of 'boots on the ground' verification activities for critical aspects of food safety, including sense of smell, understanding work, food safety and corporate culture; in-person interactions with staff; learning/coaching/understanding exchanges during an audit.

Critically, GFSI has sought to maintain the veracity of its systems and benchmarking requirements in the interim while managing the circumstances and challenges resulting from the pandemic and has continued to monitor the use of ICT in audit and verification activities by GFSI recognized Certification Programme Owners and delivered by Certification Bodies.

3. The need for agreed and informed guidance

GFSI was supportive of efforts by Australia at CCFICS25 for Codex to consider developing guidance that enabled consistent application of alternative means of conducting audit and verification activities and continues to support the work of the EWG, chaired by Australia and co-chaired by Singapore and Canada.

GFSI has maintained its view that a hybrid model is currently the most appropriate policy and there is a case for audit activities like preparatory work, entry and exit meetings, review of documentation etc to be done efficiently remotely.

GFSI is seeking to update and broaden the evidence to compare the veracity of on-site, hybrid and fully remote audit activities. GFSI will soon announce a second call for evidence to food business operators, certification bodies and certification programme owners to assess the impact on food safety of changes introduced to GFSI certification standards, audit protocols and the cultural practice of using virtual tools on a larger scale. It is seeking data and information to help quantify the objective measurement of food safety from the use of ICT for audit activities. Specifically, information will be collected on the time taken to prepare the audit; the duration of the audit; the cost of the audit under different scenarios (on-site; full or partially remote); the outcome of the audit (such as the number of significant/non-significant non-conformities and certification outcomes); the overall impact on each aspect of the audit (documentation and record review, site inspection); and whether there are any changes to food safety performance status of sites (using measures such as complaints, inspection results).

GFSI is committed to have a solid evidence base to determine its position on the role of remote audit and verification to assess food safety. A practical contribution to the development of this important guidance being developed by CCFICS.

4. GFSI has re-affirmed its commitment to evidence-based Codex guidance

GFSI again re-iterated its commitment to having a sound evidence base to assess the merits of ICT in audit and inspection activities at the recent government to business meeting (G2B) held in Atlanta on 28-29 April 2023. Further, the contribution to the development of practical Codex guidance was supported.

5. Sharing the results to inform the development of CCFICS guidance

As it did with the results of its initial survey, GFSI will be transparent in sharing the results of this second survey and its associated analysis with competent authorities and other interested parties. A webinar will be held on June 29 2023 at 1pm CET. GFSI remains committed to the development of practical and rigorous guidance on the role ICT can play in remote audit and verification in regulatory frameworks.