Sustainable Supply Chain Initiative – Scheme Management Benchmarking Criteria

Primary Production Scope

(including Aquaculture Activities in collaboration with the Global Sustainable Seafood Initiative (GSSI) and Sustainable Trade Initiative (IDH))

Draft for Public Consultation | 29th September 2020

Overview

This document lists all SSCI Draft Criteria for the Management of Schemes for Primary Production Scope, which are intended to benchmark third-party sustainability standards/programmes that cover land-based agricultural and aquaculture scope.

The draft criteria are developed by the SSCI Technical Working Group for Primary Production. The development also involved the Aquaculture Expert Panel, which was set up in collaboration with the Global Sustainable Seafood Initiative (GSSI) and Sustainable Trade Initiative (IDH), to review the criteria applicability to aquaculture activities. CGF SSCI would like to thank the GSSI Team and IDH Team for their continued support throughout this development.

For more information, please visit the CGF SSCI website.

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A1. Scheme Governance

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
A1.01 The Scheme Owner shall be an organisation that is a legal entity, which could be held legally responsible for the schemes' operations.	The criterion is taken from GFSI and GSSI: GFSI 1.1.1 The Scheme Owner shall be an organisation that is a legal entity, or an organisation which is a partnership of legal entities. The scheme cannot be developed, managed or owned by a Certification Body or group of Certification Bodies. GSSI A1.01 The Scheme Owner is a legal entity, or an organization that is a partnership of legal entities, or a government or inter-governmental agency.
A1.02 The scheme cannot be managed or owned in whole or in part by an audit firm or group of audit firms to ensure that the scheme owner is not directly engaged in operational affairs (auditing or certification) of the programme.	The criterion is taken from GFSI and GSSI: GFSI 1.1.1 The Scheme Owner shall be an organisation that is a legal entity, or an organisation which is a partnership of legal entities. The scheme cannot be developed, managed or owned by a Certification Body or group of Certification Bodies. GSSI A1.02 The Scheme Owner is not directly engaged in the operational affairs (auditing or certification) of the certification or accreditation program. Note: This does not include complaint resolution or performance review.
A1.03 The Scheme Owner shall have adequate arrangements to cover liabilities arising from its operations.	The criterion is taken from ISEAL: ISEAL Assurance Code 4.2.2 The scheme owner shall have adequate arrangements to cover liabilities arising from its operations and shall have the financial stability and resources required to carry out those operations.
A1.04 The Scheme Owner operates to a documented set of governance policies and procedures specifying at least the following: **- Board or governance body election or appointment process,** **- Board or governance body representation and Terms of Reference,** **- Member categories (where applicable),** **- Income generation or funding processes,** **- An organisational structure,**	The criterion is taken from GSSI: GSSI A1.03 The Scheme Owner operates to a documented set of governance policies and procedures specifying at least the following: - Board or governance body election or appointment process, - Board or governance body representation and Terms of Reference, - Member categories (where applicable), - Income generation or funding processes, - An organizational structure, - The decision-making processes of each governance body, - Key personnel roles (responsibility and authority), - Managing conflict of interest, and

- The decision-making processes of each governance body, **- Key personnel roles (responsibility and authority),** **- Managing conflict of interest, and** **- Assurance process.**	- A conformity assessment program.
A1.05 The Scheme Owner shall have in place a publicly available appeals and complaints resolution procedure and shall require this from approved audit firms and accreditation bodies. Each procedure shall require the respective body to: **- investigate and take appropriate action regarding relevant complaints, within defined timelines;** **- review and take any necessary corrective actions; and** **- keep a record of all complaints and resulting actions.**	The criterion is taken from ISEAL: ISEAL Assurance Code 5.11.12 The scheme owner shall have in place a publicly available and accessible complaints resolution procedure and shall require this also of its assurance providers and oversight bodies. Each procedure shall require the respective body to: investigate and take appropriate action regarding relevant complaints, within defined timelines; review and take any necessary corrective actions; and keep a record of all complaints and resulting actions to be made available for internal audits and management reviews.

A2. Scope and Objectives

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
A2.01 The Scheme Owner shall have a defined scope for auditing under its scheme.	The criterion is taken from GFSI, GSSI and ISEAL: GSSI A1.07 Tithe Scheme Owner has a defined scope for certification under its scheme. GFSI 1.1.6 The scheme shall have a clearly defined scope of certification commensurate to the GFSI scope(s) of recognition, and the standard and system shall specify the requirements for supporting systems and procedures to ensure that users are fully aware of compliance obligations. GFSI 1.1.7 The scheme shall have a scope of certification in accordance with the requirements of ISO/IEC 17065 or ISO/IEC 17021. ISEAL Assurance Code 5.4.1 The scheme owner shall specify the approach to oversight and its implementation appropriate to the scope and operations of the scheme. [...]

A2.02 If the Scheme's auditing scope includes smallholders/family farms, the Scheme owner shall have clear rules for the classification of producers as "smallholder/family farm" producers.	This new SSCI criterion has been added that describes the industry's expectations for scheme management.

A3. Integrity Programme

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
A3.01 The Scheme Owner shall have in place a clearly defined system for the approval, suspension and withdrawal of audit services by audit firms for the scope of their scheme.	The criterion is taken from GFSI: GFSI 2.7.1 A clearly defined system for the granting, suspension and withdrawal of certification services by Certification Bodies for the scope of their scheme.
A3.02 The Scheme Owner shall define procedures to monitor the performance of audit firms. The procedures shall, at a minimum, include: **- the review of complaints** **- the review of audit reports** **- a risk-based programme of office audits and witness audits of audit firms that are approved to operate under the scheme.** **The monitoring of the performance may take the form of a risk-based programme, based on the region they operate, past complaints, number, size and complexity of assessments carried out by an audit firm.**	The criterion is taken from GFSI and also based on ISEAL: GFSI 1.2.1 The Scheme Owner shall have in place a system of key performance indicators for Certification Bodies, which are monitored by a series of measures including complaints procedures and report screening procedures. There shall also be in place a risk-based programme of office audits and announced, but unscheduled, audits of accredited certification bodies. The measurement of key performance indicators shall be carried out according to a risk-based programme, which is based on the number, size and complexity of assessments carried out by a Certification Body. ISEAL Assurance Code 4.2.1 The scheme owner's senior assurance staff shall maintain a risk management plan that includes a list of the most significant risks to the integrity of the assurance system, a quantification of those risks, and a description of the strategies being employed to mitigate each of these risks. The plan shall include a revision schedule and be revised as risks arise or change.

A4. Logo Use and Claims

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
A4.01 The Scheme Owner shall have a publicly available policy governing use of symbols, logos and claims. **The policy shall, at a minimum, include that symbols, logos and claims** **- are only applied to activities that are within the scope of certification/auditing,** **- do not overstate or mislead users relative to the defined scope or the status of the auditee** **- are relevant to that scope and** **- the policy shall address copyright protection.**	The criterion is taken from GSSI and ISEAL: GSSI A2.01 The Scheme Owner has a publicly available policy governing use of symbols, logos and claims. GSSI A2.02 Through the claims policy, the Scheme Owner ensures copyright is protected and that symbols, logos and claims are only applied to activities that are within the scope of certification, do not overstate or mislead users relative to the defined scope, and are relevant to that scope. GSSI A2.03 The Scheme Owner requires that the certified organization does not make or permit any misleading statement or use regarding the status or scope of its certification. ISEAL Assurance Code 5.1.11 The scheme owner shall have procedures in place that define the rules governing use and communication of assurance status, claims of compliance, and references to assurance, and shall require that clients comply with these rules.
A4.02 In the case of certification schemes, the Scheme Owner or its delegated authority issues written and enforceable authorisations and/or licenses to use the scheme's mark/claim/logo only when the facility and/or product has been audited as being in conformity with the relevant standard.	The criterion is taken from GSSI: GSSI A2.04 The Scheme Owner or its delegated authority issues written and enforceable authorizations and/or licenses to use the scheme's mark/claim/logo only when the facility and/or product has been certified as being in conformity with the relevant standard.

A5. Standard Setting and Maintenance

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
A5.01 The Scheme Owner shall have a document control procedure in place to ensure that all of the scheme's normative documents are appropriately controlled and publicly available.	The criterion is taken from GFSI and ISEAL: GFSI 1.1.9 The Scheme Owner shall ensure that all of the scheme's normative documents shall be appropriately controlled and publicly available. The normative documents submitted to GFSI shall be translated in English and their translation appropriately controlled. ISEAL Assurance Code 5.1.14 The scheme owner shall implement document control procedures that guide the management and storage of system documents and records.
A5.02 The Scheme Owner shall have publicly available procedures for the process under which each standard is developed, approved and revised.	The criterion is taken from GFSI, GSSI and ISEAL: GFSI 1.1.8 The scheme shall have a standard and other defined normative documents that are established by consensus and issued using a formalised and documented approval process. GSSI A3.03 The Scheme Owner has publicly available procedures for the process under which each standard is developed and revised. ISEAL Standard Setting Code 4.1.1 Documented procedures for the process under which each standard is developed or revised shall: a. form the basis of the standard-setting process; and b. shall be made available to stakeholders, at a minimum through the organisation's website.
A5.03 The Scheme Owner shall ensure participation of technical experts and encourages balanced participation by stakeholders in the standard development, revision and approval process.	The criterion is taken from GFSI, GSSI and ISEAL: GSSI A.3.12 The Scheme Owner or delegated authority ensures participation by independent technical experts and encourages balanced participation by stakeholders in the standard development, revision and approval process. GFSI: 1.1.2 The Scheme Owner shall ensure that the scheme shall have been developed and maintained with the participation of technically competent representatives of direct stakeholders or have been subjected to formal review by such parties and subsequently determined as appropriate. For each scope of recognition, the number and interests of the stakeholder representatives involved with the scheme development shall be reflective of the sector of the food supply chain for which the scope of the scheme is intended.

	ISEAL Standard-Setting Code, 5.6 Participation in governance bodies making decisions for the standard development, revision and approval process on the content of the standard shall: a. be open to all stakeholders; and b. shall be constituted by a reasonable balance of those stakeholders, including those that are directly affected.
A5.04 The Scheme Owner shall ensure that the standard, during its development or for major revisions, **a. has been subject to public stakeholder consultation and** **b. due consideration has been given to comments received from stakeholders during the consultation.**	GFSI: 1.1.3: The Scheme Owner shall ensure that the scheme, during its development, shall have been subjected to extensive stakeholder consultation and due consideration shall have been given to comments received from stakeholders during the consultation. GSSI A.3.15 (refers to part a): The Scheme Owner ensures that interested parties can participate in the standard-setting process through a consultation forum or are made aware of alternative mechanisms by which they can participate. GSSI A.3.17 (refers to part b): The Scheme Owner takes into account in further processing of the standard, comments received during the period for commenting. ISEAL Standard Setting Code 5.4.2 The standard-setting organisation ensures that participation in the consultation process: a. is open to all stakeholders; and b. aims to achieve a balance of interests in the subject matter and in the geographic scope to which the standard applies.
A5.05 The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard during the public consultation phase.	The criterion is taken from GSSI and ISEAL: GSSI A3.13 The Scheme Owner allows a period of at least 60 days for the submission of comments on the draft standard. ISEAL Standard Setting Code 5.4.1. a. The public consultation phase for standards development or revision includes at least one round of 60 days for comment submissions by stakeholders. b. For new standards development, a second round of consultation of at least 30 days is included. c. Where substantive, unresolved issues persist after the consultation round(s), or where insufficient feedback was received, the standard-setting organisation carries out additional rounds of consultation, as necessary.
A5.06 The Scheme Owner reviews standards at least every five years for continued relevance and for effectiveness in meeting their stated objectives and, if necessary, revises them in a timely manner.	The criterion is taken from GSSI and ISEAL: GSSI A3.08 The Scheme Owner reviews standards at least every five years for continued relevance and for effectiveness in meeting their stated objectives and, if necessary, revises them in a timely manner. ISEAL Standard Setting Code 5.8.1 The standard-setting organisation:

	a. reviews a standard at least every five years for continued relevance and for effectiveness in meeting its stated objectives; and b. if necessary, revises it in a timely manner, in line with the requirements in this section.
A5.07 The Scheme Owner shall prepare sufficient guidance on the standard to support consistent interpretation of its requirements.	The criterion is taken from ISEAL: ISEAL Standard Setting Code 6.3.2 The standard-setting organisation shall prepare sufficient guidance on the standard to support consistent interpretation of its requirements.

B1. Accreditation

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
B1.01 The Scheme Owner shall require that audit firms achieve and maintain accreditation against the current version of ISO/IEC 17021-1 or ISO/IEC 17065 for the scope of the respective standard of the scheme.	The criterion is taken from GFSI and GSSI: GFSI 2.1.3 The Scheme Owner shall ensure that all activities resulting in the issuing of certificates are delivered by Certification Bodies, which are accredited by Accreditation Bodies that are members of the International Accreditation Forum (IAF) in compliance with ISO/IEC 17065 or ISO/IEC 17021 and are signatories to the Multilateral Recognition Arrangement (MLA) for the appropriate scope. GSSI B2.01 The Scheme Owner requires that certification bodies operating in the scheme are accredited to ISO/IEC 17065:2012 for the scope of the respective standard of the scheme.
B1.02 In the event that an audit firm is not yet accredited to ISO/IEC 17021 or ISO/IEC 17065, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to achieve ISO accreditation. If a transition period is granted, it shall not exceed two years.	The criterion was added in order to allow scheme owners and audit firms time to adapt to the requirement above, if necessary.

B1.03 The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of the current version of ISO/IEC 17011.	The criterion is taken from GSSI and also based on ISEAL: GSSI B1.01: The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires accreditation bodies to be compliant with the requirements of ISO/IEC 17011:2004. ISEAL Assurance Code 5.4.5 Where the scheme incorporates accreditation as an oversight mechanism, the scheme owner shall ensure that accreditation bodies comply with the current version of ISO/IEC 17011 in addition to the Assurance Code requirements that apply to oversight bodies.
B1.04 The Scheme Owner specifies the requirements for audit firms that the accreditation body is required to verify.	The criterion is taken from GSSI: GSSI B1.03 The Scheme Owner specifies the requirements for certification bodies that the accreditation body is required to verify.
B1.05 The Scheme Owner only works with accreditation bodies that have personnel with the necessary education, training, technical knowledge and experience for performing accreditation functions in social compliance.	The criterion is taken from GSSI: GSSI B1.05 The Scheme Owner only works with accreditation bodies that have personnel with the necessary education, training, technical knowledge and experience for performing accreditation functions in fisheries and aquaculture operations.
B1.06 The Scheme Owner shall ensure that assessment staff within the accreditation body have knowledge of the standard and its intent, and of the schemes' assurance requirements.	The criterion is taken from ISEAL: ISEAL Assurance Code 5.4.3 The scheme owner shall ensure that assessment staff within the oversight body have in-depth knowledge of the standard and its intent, and of the scheme's assurance requirements.
B1.07 The Scheme Owner ensures that the accreditation process includes an on-site audit of the audit firm.	The criterion is taken from GSSI: GSSI B1.08 The Scheme Owner ensures that the accreditation process includes an on-site audit of the certification body.
B1.08 The Scheme Owner shall have an agreement in place with the accreditation body to ensure that, in the event that an audit firm has its accreditation withdrawn or suspended by the accreditation body, the Scheme Owner is informed of this action.	The criterion is taken from GFSI: GFSI: 2.1.5 The Scheme Owner shall have an agreement in place with the AB to ensure that, in the event that a Certification Body has its accreditation withdrawn or suspended by an Accreditation Body, the Scheme Owner is informed of this action.

B1.09 If more than one accreditation body is used, the Scheme Owner shall ensure that the accreditation is implemented in a consistent manner.	The criterion is based on GFSI: GFSI 2.2.3 The Scheme Owner will act to ensure that the accreditation standard used by all national Accreditation Bodies for the scope of their scheme is consistent and, where appropriate, facilitates a harmonised agreement on behalf of the contracted Certification Bodies

B2. Relationships with Audit Firms

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
B2.01 The Scheme Owner shall ensure that audit firms that are approved to operate their scheme are legal entities.	The criterion is based on ISEAL: ISEAL Assurance Code 5.2.1 The scheme owner shall ensure that oversight bodies and assurance providers are legally incorporated entities.
B2.02 The Scheme Owner shall ensure that it has contractual and enforceable arrangements with all audit firms that are approved to operate their scheme.	The criterion is taken from GFSI and ISEAL: GFSI 2.2.1 The Scheme Owner shall ensure that it has contractual and enforceable arrangements with all Certification Bodies that are approved to operate their scheme. ISEAL Assurance Code 5.2.2 The scheme owner shall have legally enforceable contracts with oversight bodies and assurance providers (either directly or through the oversight body) that delineate responsibilities and obligations, including data use and confidentiality. The scheme owner shall also require this of assurance providers with their clients. Where the scheme owner is the assurance provider, it shall have legally enforceable contracts with the clients.
B2.03 The Scheme Owner shall have in place a system to ensure an audit firm notifies them of all executed audit activities under their scheme, as well as any withdrawal or suspension.	The criterion is based on GFSI: GFSI 2.2.16 The Scheme Owner shall have in place a system to ensure a Certification Body notifies them of successful supplier certifications, as well as any withdrawal or suspension of certification of a supplier.
B2.04 The Scheme Owner shall ensure that the audit firm operates an effective and fully implemented quality system. The quality system shall be fully documented and used by all relevant audit firm staff.	The criterion is taken from GFSI: GFSI 2.2.19 The Scheme Owner shall ensure that the Certification Body shall operate an effective and fully implemented quality system. The quality system shall be fully documented and used by all relevant Certification Body staff. Within the Certification Body there shall be a designated member of staff responsible for the quality system's development, implementation and maintenance. This designated member of staff will have a reporting role to the organisation's executive and shall also have the responsibility for reporting on the performance of the quality system for the purposes of management review and subsequent system improvement.

B3. Auditor Competence

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
B3.01 The Scheme Owner shall define the qualifications and competence criteria required of auditors.	The criterion is taken from GFSI, GSSI and ISEAL: GFSI 2.3.1.1 The Certification Body shall employ personnel who have the competence requirements to meet all management, administrative, technical and auditing functions within the organisation. GSSI B2.17: The Scheme Owner has defined the qualifications and competence criteria required by auditors and audit teams, employed by certification bodies, and it makes this information publicly available. ISEAL Assurance Code 5.5.1 The scheme owner shall define the qualifications and competency requirements for its assurance staff and for auditors and other assurance personnel, [...]
B3.02 The lead auditor performing audits for the audit firm shall have the following experience: **- a minimum of 1-year experience in social compliance auditing and a minimum of 100 social compliance audit days** **OR** **- a minimum of 2 years' experience in any other type of auditing and 150 audit days of which a minimum of 50 are social compliance audit days. Other audit days may include management system, health and safety, labour inspections, investigations, audit components.**	APSCA Competency Framework, APSCA Qualification Levels: Requirements for APSCA Certified Social Compliance Auditors (APSCA CSCA): *Has obtained the level of ASCA * Has been signed off by a Member Firm as competent in meeting CSCA Level competencies * Has passed all elements of the CSCA examination process * Has the following experience: - Minimum 1 years' experience in social compliance auditing, and - Minimum 100 social compliance audit days, provided via audit log signed off by audit firm(s). OR - Minimum 2 years' experience in any other type of auditing, and - 150 audit days, of which a minimum of 50 are social compliance audit days. Other audit days may include management system, health and safety, labour inspections, investigations, audit components * Has signed APSCA's Code of Professional Conduct
B3.03 In the event that an audit firm is not yet meeting the requirements of B3.02, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to meet these requirements.	The criterion was added in order to allow scheme owners and audit firms time to adapt to the criterion above, if necessary.

B3.04 The Scheme Owner shall require audit firms that auditor competence is demonstrated on a recurring basis. The competence assessment of lead auditors and audit team members shall include the following: **- an assessment of knowledge of local and national labour and human rights issues and legislation;** **- an assessment of skills in interviewing workers on human and labour rights issues,** **- an assessment of knowledge of the relevant sector;** **- an assessment of the personal attributes of the auditor, to ensure they conduct themselves in a professional manner;** **- a period of supervision (witnessed audits) to cover specific audit techniques and specific category knowledge;** **- a documented sign off by the audit firm of the satisfactory completion of assessment requirements.**	The criterion is taken from GSSI and also based on ISEAL: GSSI B2.20 The Scheme Owner requires that certification bodies include the following in their competence assessment of auditors: - an assessment of knowledge and skills for each fundamental area the auditor will be expected to be working, - an assessment of knowledge of pertinent fishery and /or aquaculture Programs and the ability to access and be able to apply relevant laws and regulations, - an assessment of the personal attributes of the auditor, to ensure they conduct themselves in a professional manner, - a period of supervision to cover the assessment fishery and/or aquaculture principles, specific audit techniques and specific category knowledge, - a documented sign off by the certification body of the satisfactory completion of assessment requirements. ISEAL Assurance Code 5.5.4 The scheme owner shall require that auditor competence is demonstrated on a recurring basis through evaluation by assurance providers, oversight bodies, or other entities, using defined verification mechanisms that include witnessing auditor performance.
B3.05 The Scheme Owner shall require audit firms that their auditors have successfully completed approved training in the respective scheme to the satisfaction of the scheme owner. Training shall be repeated regularly and following major revisions of the scheme.	The criterion is taken from GSSI and ISEAL: GSSI B2.18 The Scheme Owner requires certification body auditors to have successfully completed training in the scheme to the satisfaction of the Scheme Owner. ISEAL Assurance Code 5.5.2 The scheme owner shall require that assurance provider and oversight body auditors and other assurance personnel, including the scheme owner's assurance staff, receive initial training and ongoing professional development according to the requirements of their respective positions.
B3.06 The Scheme Owner shall ensure that audit firms have a structure in place that assures that auditors shall keep up to date with industry best practice.	The criterion is taken from GFSI and GSSI: GFSI 2.3.6 The Scheme Owner shall assure that Certification Bodies have a structure in place that assures that the auditor shall keep up to date with industry sector best practice, food safety and technological developments and have access to and be able to apply relevant laws and regulations and shall maintain written records of all relevant training undertaken. GSSI B2.22 The Scheme Owner requires that certification bodies have a continuing professional development program in place

	that provides auditors with current best practice for fisheries and/or aquaculture.
B3.07 The Scheme Owner shall require audit firms to provide specific training to auditors on a regular basis, based on the most pertinent social compliance risks in the regions they operate in and individual performance reviews. Scheme owners shall require audit firms to document training attendance.	The criterion is based on ISEAL and provides further detail on implementing the requirement on ongoing professional development: ISEAL Assurance Code 5.5.2 The scheme owner shall require that assurance provider and oversight body auditors and other assurance personnel, including the scheme owner's assurance staff, receive initial training and ongoing professional development according to the requirements of their respective positions.
B3.08 The Scheme Owner shall require that if an audit firm sub-contracts any work to another party, a legally enforceable agreement between the audit firm and the sub-contracted party is in place to ensure the sub-contracted party adheres to the same policies, procedures and competence requirements when auditing against the scheme.	The criterion is taken from the GSCP Auditor Competence tool and is also based on ISEAL: GSCP Auditor Competence Tool v2, 2.4.1 If the auditing body sub-contracts any work to another party, a legally enforceable agreement is entered into with the contractual partner and documented procedures for the qualification and monitoring of all subcontracted bodies should be in place. GSCP Auditor Competence Tool v2, 2.4.2 The primary auditing body is accountable for the quality of the audit, the audit report and any recommendations made regardless of whether the audit was conducted by its own staff or by sub-contractors, and they should continue to meet all the requirements specified within this Reference tool, the other applicable GSCP Reference tools, or equivalent applicable rules and guidelines. ISEAL Assurance Code 5.2.4 The scheme owner shall require that oversight bodies and assurance providers take responsibility for ensuring the quality and integrity of all assurance activities outsourced to another body.
B3.09 The Scheme Owner shall require all approved audit firms to implement an ongoing programme for auditor calibration.	The criterion is taken from ISEAL: ISEAL Assurance Code 5.5.3 The scheme owner shall require assurance providers to implement an ongoing programme for auditor and assurance personnel calibration. Where the scheme employs multiple oversight bodies, it shall require a similar programme of calibration for the auditors of these bodies.

B4. Audit Protocol

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
B4.01 The Scheme Owner shall define the methodology to assess compliance with the standard and require audit firms to apply this methodology consistently.	The criterion is based on GSSI: GSSI B2.05 The Scheme Owner ensures that certification bodies apply a consistent methodology to assess compliance with the standard.
B4.02 The Scheme Owner shall require that the scope of the audit includes an on-site assessment of the main site and all other pertinent off-site locations, including accommodation facilities, where provided or mandated.	The criterion is taken from GSSI and ISEAL: GSSI B2.11 The Scheme Owner requires that the scope of the (re-) certification audit includes a visit to locations pertinent to the scope of the certification.
B4.03 The Scheme Owner shall define a procedure for audit firms to determine the number and selection of pertinent locations.	The criterion provides further detail to implement the criterion above, based on GSSI. GSSI B2.11 The Scheme Owner requires that the scope of the (re-) certification audit includes a visit to locations pertinent to the scope of the certification.
B4.04 The Scheme Owner shall have a clearly defined and documented audit frequency programme. The maximum validity of an audit or certificate shall not exceed 3 years. **The Scheme Owner shall require audit firms to carry out periodic surveillance audits at sufficiently close intervals to verify compliance with the standards' requirements. The rationale behind these intervals shall be clearly defined and transparent.**	The criterion is taken from GSSI and ISEAL: GSSI B2.03 The Scheme Owner requires that the validity of a certification cycle does not exceed 5 years in the case of fishery or 3 years in the case of aquaculture certification and 3 years in the case of chain of custody certification. GSSI B2.04 The Scheme Owner requires that audit firm's certification bodies carry out periodic surveillance and monitoring at sufficiently close intervals to verify that certified operations continue to comply with the certification requirements. For aquaculture operations, this should be on an annual basis. ISEAL Assurance Code 6.4.3 Standards system owners shall set the audit frequency and intensity to be employed by assurance providers in the standards system. Where an assurance programme uses a risk-based approach to determine audit frequency and intensity, the standards system owner shall develop a procedure that identifies the risk factors for assurance

	providers to assess the risk level of clients, the overall risk categorisation, and the resulting audit frequency and intensity associated with each risk category.
B4.05 The Scheme Owner shall ensure that, irrespective of the defined minimum audit frequency, the audit firm shall undertake additional surveillance audits in the event that there is evidence or suspicion of non-conformity within an organisation.	The criterion is taken from GFSI: GFSI: 2.5.4 The Scheme Owner shall ensure that, irrespective of the defined minimum audit frequency, the Certification Body shall undertake additional surveillance audits in the event that there is evidence or suspicion of non-conformity within an organisation.
B4.06 The audit shall take place during a period when the employment site is in normal operation. Resulting variations to audit frequency shall be clearly defined and documented.	The criterion is based on GFSI and the GSCP Audit Process and Methodology tool: GFSI 2.5.6 If a Scheme Owner has standards that includes the growing or production of seasonal products and, therefore, will require some limited flexibility of audit frequency to allow effective auditing of seasonal products. These variations to audit frequency shall be clearly defined. GSCP APM 3.2.1 Audits should take place during a period when the employment site is in full operation (such as peak production or harvest).
B4.07 The Scheme Owner shall clearly define the expected duration of audits and the rationale for the determination of the duration of the audit that audit firms are required to follow during the audit. The rationale shall at a minimum include the size of the workforce and should include additional criteria that will ensure the effectiveness of the audit such as the physical size of the location to audit, number of locations, nationalities of the workforce, product lines and product categories, etc.	The criterion is taken from GFSI, the GSCP Audit Process and Methodology tool and GSSI: GFSI 2.5.7 The Scheme Owner shall clearly define the expected duration of audits and the rationale for the determination of the duration of the audit; [...] GSCP APM 3.2.2 The number of auditor days at the employment site should be based on the size of the workforce. GSSI Supplementary Components B2.05.01 The Scheme Owner has a publicly available methodology for calculating minimum audit duration.
B4.08 The Scheme Owner shall have in place auditing procedures and guidance for group/multi-site auditing and requires audit firms to apply the methodology consistently, if allowed under the scheme.	The criterion is taken from GSSI: GSSI B2.07 The Scheme Owner requires that accredited certification bodies have certification procedures and guidance for multi-site certifications, if allowed under the scheme.
B4.09 The Scheme Owner shall require that audits include worker and management interviews, the observation of processes and activities and the review of relevant documentation and records.	The criterion is taken from ISO/IEC 17021-1:2015 ISO/IEC 17021-1:2015 9.1.9.5 Collecting and verifying information 9.1.9.5.2 Methods to collect information shall include, but are not limited to: a) interviews; b) observation of processes and activities;

	c) review of documentation and records.
B4.10 The Scheme Owner shall require that translators are not used to support interviews with language groups which make up to 50% or more of the workforce. **In the case of the participation of translators, the independence and confidentiality of translators shall be guaranteed.**	The criterion is based on the GSCP Audit Process and Methodology tool. 4.2. Interviews 4.2.3 Translators are not used to support interviews with language groups which make up to 50% or more of the workforce. In these cases, the worker interviewer is a native speaker of the language concerned. (NB - In cases where there is a multi-lingual workforce, worker interviewers work through a translator to access the views of workers from minority groups.) 4.2.4 Translators are independent of employment site management and speak the language concerned.
B4.11 The Scheme Owner shall define the methodology for defining the number of workers to be interviewed. Interviewed workers shall reflect a wide range of workers and include potentially vulnerable workers and those in less skilled positions.	The criterion is based on the GSCP Audit Process and Methodology tool. GSCP APM, 4.3.1 […] the interviewer should aim to talk to a wide range of workers including potentially vulnerable workers and those in less skilled position […].
B4.12 The Scheme Owner shall define requirements for the execution of worker interviews that audit firms are required to implement. The requirements include at a minimum that: **- Workers shall be interviewed both individually and in groups** **- Workers shall be interviewed in a confidential setting without any supervision or management personnel present** **- Information provided by workers shall be processed in a non-attributable manner** **- Workers shall be interviewed in their own language** **- The selection of workers shall consider that they are representative of the factory, by characteristics such as gender, age, length of service and origin** **- In any event, management, supervisors or their representatives shall not act as interpreters.**	The criterion is taken from the GSCP Audit Process and Methodology Tool: GSCP APM 3.2.2 Workers should be interviewed individually and in groups and in formal and informal settings without management present. Best practice is to interview some workers off-site, where they may feel more able to speak freely about any concerns they may have. Workers should be interviewed preferably in their own language. In any event management or their representatives shall not act as interpreters. Individual Interview should last at least 15 minutes and will typically be expected to last 30 minutes. Longer interviews will be required in some circumstances, including group interviews. GSCP APM 4.3.1 [...] auditors should ensure that problems raised by workers are discussed with management in a non-attributable way. Auditors must ensure that the comments they report cannot be traced back to an individual worker; [...]

B5. Audit Reporting

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
B5.01 The Scheme Owner shall require certificates/audit reports to include, at a minimum: **– the name and address of the Scheme Owner;** **– the name and address of the audit firm;** **– the name and address of the audited site;** **– the effective date of issue of the certificate/audit report;** **– the substance (scope of audit) of the certificate/audit report;** **– in case of certification schemes: the term for which the certification is valid;** **– signature of the issuing officer.**	The criterion is taken from GSSI: GSSI A2.05 The Scheme Owner requires certificates to include, at a minimum: – the name and address of the accreditation body or Scheme Owner; – the name and address of the certification body; – the name and address of the certification holder; – the effective date of issue of the certificate; – the substance (scope of certification) of the certificate; – the term for which the certification is valid; – signature of the issuing officer.
B5.02 Reports and grading systems shall clearly identify whether audits are announced, semi-announced or unannounced.	The criterion is based on GFSI: GFSI 2.5.5 The Scheme Owner shall ensure that unannounced audits, which can offer a greater degree of assurance compared to announced audits, shall be available as a preferred option in the programme offered by the Scheme. Reports, certificates and grading systems shall clearly identify whether audits are announced or unannounced.
B5.03 The Scheme Owner shall require that audit reports shall contain evidence that all the relevant criteria have been checked during the audit. In the case where a non-conformity is identified by the auditor, clear and concise details of the non-conformity shall be provided in the audit report.	The criterion is taken from GFSI: GFSI 2.6.4 The audit report shall contain evidence that all the relevant criteria have been checked during the audit and clearly express where the site is in compliance, or not. In the case where a non-conformity is identified by the auditor, clear and concise details of the non-conformity shall be provided in the audit report.
B5.04 The Scheme Owner shall require audit firms to ensure that audit reports of full audits are given a thorough technical review. Surveillance audits shall, at a minimum, be reviewed according to a risk-based approach.	The criterion is based on GFSI: GFSI 2.7.3 The Scheme Owner's system for granting the approval of certification services by Certification Bodies for the scope of their scheme shall include the requirement that each assessment report is given a thorough technical review prior to granting, suspending, withdrawing or renewing certification. For the review process to be effective it shall ensure that:

For the review process to be effective it shall be ensured that: **- reviewers are impartial and technically capable of understanding the content of reports;** **- all applicable requirements of the standard have been fully covered, using any supporting notes made during the assessment by a suitably qualified auditor,** **- all areas of non-conformity have been identified and supported with clear evidence,** **- in the case of certification schemes, effective corrective action has been taken to resolve these non-conformities.**	- reviewers are impartial and technically capable of understanding the content of reports and reports are accurately assessed to demonstrate satisfactory evidence of compliance with the scheme, - all applicable requirements of the standard have been fully covered, using any supporting notes made during the assessment by a suitably qualified auditor, - the scope of the report covers the scope applied for by the organisation and the report provides satisfactory evidence that all areas of the scope have been fully investigated, - all areas of non-conformity have been identified and effective corrective action has been taken to resolve these non-conformities.
B5.05 The Scheme Owner shall define clear procedures in case non-compliances are found that pose an imminent danger to workers.	The criterion is based on the GSCP APM: Where a 'critical' non-compliance is identified, the auditor should, wherever possible, inform the audit requestor within 24 hours. If the audit requestor is on site, the auditor should communicate the critical non-compliance immediately. This will enable the audit requestor and the employment site to work together to plan an appropriate and timely resolution to the issue.

B6. Follow-up Action

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
B6.01 The Scheme Owner shall have a system for the classification of non-conformities that clearly specifies the definition of the different types of non-conformities.	The criterion is based on GSSI: GSSI B2.16 The Scheme Owner clearly defines the criteria relating to the classification of non-conformities. Where the Scheme Owner allows for certification of an entity with non-compliances, the Scheme Owner requires that: - only non-conformities on minor, non-critical issues are allowed; - a timeline for closing out corrective actions must be defined; - a system to verify that corrective actions have been closed out is in place.
B6.02 The Scheme Owner shall require the auditee to perform a root cause analysis of the non-conformities found.	The criterion is taken from ISO/IEC 17021-1:2015 The certification body shall require the client to analyse the cause and describe the specific correction and corrective action taken, or planned to be taken, to eliminate detected nonconformities, within a defined time.
B6.03 If one or more non-conformities are found, the Scheme Owner shall require the auditee to prepare a corrective action plan, including details on the corrective actions and the time frame in which corrective actions shall be undertaken.	The criterion is taken from GFSI and GSSI: GFSI 2.7.2 All non-conforming organisations shall have corrective action plans and evidence of implementation submitted for the Certification Body to verify that the organisation fully meets the requirement of the scheme's standard. GSSI B2.16 The Scheme Owner clearly defines the criteria relating to the classification of non-conformities. Where the Scheme Owner allows for certification of an entity with non-compliances, the Scheme Owner requires that: - only non-conformities on minor, non-critical issues are allowed; - a timeline for closing out corrective actions must be defined; - a system to verify that corrective actions have been closed out is in place.
B6.04 Verification of the implementation of the corrective action plan by an audit firm shall take the form of further on-site assessment OR the review of submitted documentation assessed by a technically competent member or group within the audit firm.	The criterion is based on GFSI and the GSCP Audit Process and Methodology tool: GFSI: 2.7.2.1 Verification of the corrective action plan by a Certification Body shall take the form of further on-site assessment or the scrutiny of submitted documentation including updated procedures, records and photographs assessed by a technically competent member or group within the Certification Body.

Follow-up audits shall be performed for critical or major non-compliances or when corrective actions can be evaluated only through an on-site visit.	GSCP APM, 5.4.1 Follow-up audits are recommended for critical or major noncompliance's or when corrective actions can be evaluated only through interviews and extensive documentation reviews.
B6.05 The Scheme Owner shall define clear procedures regarding the follow-up action when non-conformities are found. In the case of certification schemes, all evidence of corrective action shall be submitted, completed and verified by the audit firm, within a timescale defined by the Scheme Owner.	The criterion is based on GFSI and GSSI. Note that SSCI will recognise monitoring and certification systems. GFSI: 2.7.2.2 All evidence of corrective action shall be returned, completed and verified by the Certification Body, within a timescale defined with the Scheme Owner, before certification can be awarded. GSSI B2.16 The Scheme Owner clearly defines the criteria relating to the classification of non-conformities. Where the Scheme Owner allows for certification of an entity with non-compliances, the Scheme Owner requires that: - only non-conformities on minor, non-critical issues are allowed; - a timeline for closing out corrective actions must be defined; - a system to verify that corrective actions have been closed out is in place.
B6.06 In case of certification schemes, the Scheme Owner shall provide audit firms with consistent documented procedure(s) that specify the conditions under which certification may be suspended or withdrawn, partially or in total, for all or part of the scope of certification.	The criterion is taken from GSSI: GSSI B2.06 The Scheme Owner ensures that accredited certification bodies have consistent documented procedure(s) that specify the conditions under which certification may be suspended or withdrawn, partially or in total, for all or part of the scope of certification.
B6.07 The Scheme Owner shall require that the audit firm has in place a clearly defined and publicly available appeals procedure.	The criterion is taken from GFSI, GSSI and ISEAL: GFSI 2.7.4 The Certification Body shall have in place a clearly defined and publicly available appeals procedure. GSSI B2.10 The Scheme Owner requires that certification bodies use a consistent procedure for determining non-compliances, verifying corrective actions arising from non-compliances and] allowing for appeals of non-compliances. ISEAL Assurance Code 5.1.9 The scheme owner shall require assurance providers and oversight bodies to implement a publicly available appeals procedure whereby clients and assurance providers respectively can appeal assessment decisions.

B7. Data Management

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
B7.01 The Scheme Owner shall have in place a clearly defined data management system, which will hold and maintain data for the effective management and operation of the scheme.	The criterion is based on GFSI and ISEAL: GFSI 2.8.1 The Scheme Owner shall have in place a clearly defined data management system, that is publicly available, which gives insight in the certified organizations. ISEAL Assurance Code 4.4.2 The scheme owner shall maintain an information management system that supports gathering, management and analysis of relevant data from internal and external sources, including compliance data from assurance providers and oversight bodies.
B7.02 The Scheme Owner shall ensure that the data management system incorporates as a minimum: **- Number of approved audit firms,** **- Number of audit reports/certificates issued** **- In case of certification schemes: number of delisted sites.**	The criterion is taken from GSSI: GFSI 2.8.2 The Scheme Owner shall assure that data management system shall incorporate data in relation to the requirements of the GFSI Benchmarking Requirements and the annual assessment questionnaire. This will include as a minimum: - Number of approved auditors, - Number of certificates issued, - Number of delisted sites.

C1. Smallholders (Overview)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Draft Benchmarking Criteria	Source
C1.01 The Scheme Owner shall indicate whether or not it provides any specific requirements, exemptions, rules and definitions for smallholders in its assessment process.	This new SSCI criterion has been added that describes the industry's expectations for scheme management.
C1.02 The Scheme Owner shall indicate in the audit or assessment report whether smallholders were covered during any particular assessment or certification process.	This new SSCI criterion has been added that describes the industry's expectations for scheme management.
C1.03 The Scheme Owner shall disclose their complete list of exemptions for smallholders.	This new SSCI criterion has been added that describes the industry's expectations for scheme management.
C1.04 The Scheme Owner shall not allow performance exemptions for: **- Child labour** **- Forced labour** **- Minimum wage for hired workers / contracted workers** **- Fair treatment of workers** **- Operational health and safety** **Documentation exemptions may be permitted for the above topics.**	This new SSCI criterion has been added that describes the industry's expectations for scheme management.

D1. Group Certification (Overview)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Source
D1.01 The Scheme Owner shall indicate whether or not it provides any specific requirements, exemptions, rules and definitions for group or multi-site certifications/auditing.	Applicable to schemes with or without IMS	This new SSCI criterion has been added that describes the industry's expectations for scheme management.
D1.02 The Scheme Owner shall indicate in the audit or assessment report whether multiple producers or sites were covered during any particular assessment or certification process.	Applicable to schemes with or without IMS	This new SSCI criterion has been added that describes the industry's expectations for scheme management.
D1.03 If group or multi-site certification is allowed, the standard shall disclose its sampling methodology.	Applicable to schemes with or without IMS	This new SSCI criterion has been added that describes the industry's expectations for scheme management.
D1.04 The Scheme Owner shall indicate whether internal management systems are reviewed during the group or multi-site certification process. In the absence of an IMS, the standard shall disclose its assessment methodology.	Applicable to schemes with or without IMS	This new SSCI criterion has been added that describes the industry's expectations for scheme management.
D1.05 The Scheme Owner shall define clear rules for the creation of producer groups.	Applicable to schemes with or without IMS	GFSI MSS 1.2. The Certification Programme Owner shall clearly specify the conditions for a multi-site sampling.

D1.06 The Scheme Owner shall establish a risk-based approach to determine the eligibility of commodities for the group or multi-site certification/auditing. Certain crops or activities deemed "high-risk" shall not be eligible for group or multi-site certification/auditing.	Applicable to schemes with or without IMS	GFSI MSS 4.2. A risk-based approach shall be in place to determine the eligibility of commodities. Certain crops or activities deemed "high-risk" shall not be eligible for multi-site or group certification.

D2. Group Certification (Central Function)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Source
D2.01 The Scheme Owner shall require that producer groups and multi-site organisations have a clearly defined central function who acts on behalf of the group members or sites and it is responsible to ensure management commitment and compliance to the scheme requirements.	Applicable to schemes with or without IMS	GFSI MSS 2.1. There shall be a clearly defined central function to ensure management commitment to the system / integrity and clearly describe the roles and responsibilities of management, internal auditors and other members of the organisation. The central management function shall be separate and independent from the sub-sites.
D2.02 The Scheme Owner shall require that there is an established, legal or contractual link between the group members or sites and the central function.	Applicable to schemes with or without IMS	GFSI MSS 1.6. There shall be a legal or contractual link between the sites and the central function.
D2.03 The Scheme Owner shall require that the central function maintains an up-to-date list of group members and sites and has a procedure in place to inform any new group member applicants or new sites about the requirements of the scheme.	Applicable to schemes with or without IMS	This new SSCI criterion has been added that describes the industry's expectations for scheme management.

D2.04 The Scheme Owner shall require that the central function ensures that acceptance of new group members or sites happens only after an internal inspection has been performed and an improvement plan to ensure compliance has been agreed, if necessary.	Applicable to schemes with or without IMS	This new SSCI criterion has been added that describes the industry's expectations for scheme management.
D2.05 The Scheme Owner shall indicate whether a central function is responsible for implementing an Internal Management System (IMS) describing the roles and responsibilities of management, internal auditors and other members of the organisation related to scheme compliance. **In the absence of an IMS, the Scheme Owner shall establish the rules for certification/audit ensuring that the audit firm conducts annual audits on:** **• All accepted products and production processes** **• All registered group members or sites** **• The administrative sites, where relevant**	Applicable to schemes with IMS	GFSI MSS 2.1. There shall be a clearly defined central function to ensure management commitment to the system / integrity and clearly describe the roles and responsibilities of management, internal auditors and other members of the organisation. The central management function shall be separate and independent from the sub-sites.
D2.06 The Scheme Owner shall require that the central function has in place sufficient management and technical capacity to implement and maintain an internal audit programme.	Applicable to schemes with IMS	GFSI MSS 2.4. The central function shall have in place sufficient management and technical capacity to implement and maintain the internal audit programme.
D2.07 The Scheme Owner shall require that the central function maintains and retains a copy of all relevant IMS documents related to the group members or sites under the scheme.	Applicable to schemes with IMS	GFSI MSS 2.3. The central function shall have authoritative control of the Food Safety Management System of all sites within the certification and shall manage traceability and issue, maintain and retain all relevant documents relating to the sites within the programme.
D2.08 The Scheme Owner shall require that the central function performs a yearly management review of the IMS to ensure its effectiveness	Applicable to schemes with IMS	GFSI MSS 2.6. The central function shall be subject to management review in accordance with Certification Programme requirements and shall be itself subject to internal audit.

D2.09 The Scheme Owner shall require that the central function has an effective grievance mechanism. The mechanism can be used by all internal and external stakeholders.	Applicable to schemes with or without IMS	GFSI MSS 2.2. The central function shall have an effective customer complaint procedure.

D3. Group Certification (Internal Audit Programme)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Source
D3.01 The Scheme Owner shall require that an internal audit programme be in place and undertaken by the central function. This programme shall ensure an annual audit of all group members or sites, the central function and the internal management system.	Applicable to schemes with IMS	GFSI MSS 3.1. An internal audit programme shall be in place and undertaken by the central function. This programme shall ensure an annual audit of all sites, the central function and the management system.
D3.02 The Scheme Owner shall require that the internal audit programme of the central function be described in documented procedures and be both practical and feasible in operative terms.	Applicable to schemes with IMS	GFSI MSS 3.2. The internal audit programme shall have documented procedures and be both practical and feasible in operative terms.
D3.03 The Scheme Owner shall require that clear requirements for internal auditors and technical reviewers be defined and documented by the central function and reviewed by the audit firm. **Internal auditors must meet similar or comparable requirements to those for external auditors, as set out within each scheme owner's rules. This shall include, at a minimum, requirements related to internal auditor education, training, work experience or other qualifications.**	Applicable to schemes with IMS	GFSI MSS 3.3. Clear requirements for internal auditors and technical reviewers shall be defined and documented and reviewed by the certification body. Internal auditors must meet similar or comparable requirements to those for external auditors, as set out within each certification program owner's rules. This shall include, at a minimum, requirements related to internal auditor education, training, work experience or other qualifications. Their qualifications

		shall be assessed annually by the Certification Body.
D3.04 The Scheme Owner shall require that internal auditors be regularly evaluated, calibrated and monitored. Records of the evaluation, calibration and monitoring activities shall be maintained by the central function.	Applicable to schemes with IMS	GFSI MSS 3.4. Internal auditors shall be regularly evaluated, calibrated and monitored.
D3.05 The Scheme Owner shall require that internal audit reports be reviewed by the central function and include corrective measures to address the non-conformances resulting from the internal audit, as well as evidence that non-conformances are closed.	Applicable to schemes with IMS	This new SSCI criterion has been added that describes the industry's expectations for scheme management.

D4. Group Certification (Audit Protocol)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Source
D4.01 The Scheme Owner shall require that the central function requests group or multi-site certification in their application. The central function, not the individual group members or sites, shall be contracted to the audit firm.	Applicable to schemes with or without IMS	GFSI MSS 1.3. The central function shall request multi-site sampling in their application for certification to the Certification Body. The central function, not the individual sites, shall be contracted to the Certification Body.
D4.02 The Scheme Owner shall require that the central function be included in the scope of the certification/audit report.	Applicable to schemes with IMS	GFSI MSS 1.4. The central function shall be included in the scope of the certification.
D4.03 The Scheme Owner shall require that the central function be audited by the audit firm at least annually and before the audit firm undertakes the auditing of sample group members or sites. If necessary, a small number of the sample group members or sites may be audited prior to the audit to the central function.	Applicable to schemes with IMS	GFSI MSS 1.5. The central function shall be audited by the Certification Body at least annually and before the Certification Body undertakes the auditing of sample sites. If necessary, a small number of the sample sites may be audited prior to the audit to the central function.

D5. Group Certification (Site-audit sampling)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Source
D5.01 The Scheme Owner shall establish the rules for a risk-based sampling programme including a minimum sample size. **The sampling program shall include provisions to increase sample size based on various risk factors (e.g., audit scope, types of activities on-site, findings of the central management system audit, findings at sampled group members or sites, customer requirements, etc.), size of the group or multi-site, and the internal structure.**	Applicable to schemes with IMS	GFSI MSS 4.1. Certification Programme Owners shall have a system in place for the Certification Body to define a risk-based sampling programme that includes a minimum sample size determined by the Certification Program Owner. The sampling program shall include provisions to increase sample size based on various risk factors (e.g., audit scope, types of activities on-site, findings of the central management system audit, findings at sampled sites, customer requirements, etc.), size of the group or multi-site, and the internal structure.
D5.02 The Scheme Owner shall ensure that the audit firm audits a sample of the group members or sites every year.	Applicable to schemes with IMS	GFSI MSS 4.3. Certification Programme Owners shall ensure that the Certification Body audit a sample of the sites every year.
D5.03 The Scheme Owner shall require that the square root of the total number of registered group members or sites be audited. **The sampling plan can be adjusted based on the use of monitoring technologies.**	Applicable to schemes with IMS	GFSI MSS 4.4. The annual sampling size of the Certification Body audit sampling programme shall be based on IAF MD1: 2018. The square root sample of the certification body's audit of the sites/members shall be calculated per risk category. The sampling plan can be adjusted based on the use of monitoring technologies.

D5.04 The Scheme Owner shall require that the sampling programme be partly selective and partly non-selective, but at least 25% of the sample shall be randomly selected from the total number of group members or sites. In relation to the selected sites, these shall be identified based on the organisation's internal audit program findings and the individual group member or site risk profiles.	Applicable to schemes with IMS	GFSI MSS 4.5. The programme shall be partly selective and partly non-selective, but at least 25% of the sample shall be randomly selected from the total number of sites. In relation to the selected sites, these shall be identified based on the organisation's internal audit programme findings and the individual site risk profiles.
D5.05 The Scheme Owner shall require that a proportion of the audits be unannounced. The unannounced audit sample size shall be determined by the social compliance risk but be at a minimum of 20% of the sample size.	Applicable to schemes with or without IMS	This new SSCI criterion has been added that describes the industry's expectations for scheme management.
D5.06 In the case of certification schemes, if non-conformities are found which may not jeopardise certification but may raise concerns on conformity of the organisation, the Scheme Owner shall require that the audit firm increase the sample size to ensure adequate confidence in the conformity of the organisation.	Applicable to schemes with IMS	GFSI MSS 5.2. In the event that non-conformities are found when auditing sites, which may not jeopardise certification but may raise concerns on conformity of the organisation, the Certification Body shall increase the sample size to ensure adequate confidence in the conformity of the organisation.

D6. Group Certification (Follow-up Action)

This criterion is based on the SSCI existing criterion within the Processing/Manufacturing scope	New criterion

Note: IMS is an Internal Management System.

Draft Benchmarking Criteria	Applicability	Source
D6.01 The Scheme Owner shall require that non-conformities found on group members or sites be assessed to ascertain if these indicate an overall internal management system deficiency and therefore may be applicable to all or other group members or sites. If non-conformities relate to all or other group members or sites, corrective action shall be undertaken and verified both by the central function and by the audit firm.	Applicable to schemes with IMS	GFSI MSS 5.1. Non-conformities found on sites shall be assessed to ascertain if these indicate an overall Food Safety System deficiency and therefore may be applicable to all or other sites. If non-conformities relate to all or other sites, corrective action shall be undertaken and verified both by central function and by the Certification Body.
D6.02 In the case of certification schemes, if the central function or any group member or site fails to meet the critical scheme requirements, the Scheme Owner shall require that the whole organisation will fail to gain certification. Where certification has previously been in place, this shall initiate the audit firm process to suspend or withdraw its certification.	Applicable to schemes with or without IMS	GFSI MSS 5.3. If the central function, or any site fails to meet the critical Certification Programme requirements, then the whole organization, including the central function and all sub-sites, will fail to gain certification. Where certification has previously been in place, this shall initiate the Certification Body's process to suspend or withdraw its certification.
D6.03 The Scheme owner shall determine the methodology for issuing certificates/audit reports to the central function and the group member or sites. **Either:** **- certificate/audit reports are issued to the central function of the producer group or multi-site organisation; or** **- separate certificates/audit reports are issued to group members or sites of the group or multisite organisation that were audited as part of the sample plan.** **Those certificates/audit reports must be clearly distinguishable from certificates/audit reports that are issued to individually audited companies.** **The certificate/audit report must state explicitly that the recipient is part of a producer group or multi-site organisation,**	Applicable to schemes with or without IMS	This new SSCI criterion has been added that describes the industry's expectations for scheme management.

and any limitations to the scope of certification/audit report must be transparent to customers.		
D6.04 If a group member or site is allowed to sell their product outside of the producer group or multi-site organisation, the Scheme Owner shall require that the group member or site be transparent about the source and scope of the audit, by providing customers with a copy of the certificate/audit report when requested.	Applicable to schemes with or without IMS	This new SSCI criterion has been added that describes the industry's expectations for scheme management.