Choosing the Right Food Safety Program

A Primer on Food Safety Audit and Certification Options

The U.S. Food and Drug Administration (FDA) Food Safety Modernization Act (FSMA) mandates that the majority of food operations producing or selling food in the United States have a comprehensive food safety plan in place. SCS prepared this guide to help you navigate your food safety management, auditing and certification options:

- Good Agricultural Practices (GAPs) and Good Manufacturing Practices (GMPs) are considered by retailers and foodservice buyers to be a base requirement for conducting business with their suppliers.
- The Global Food Safety Initiative (GFSI) schemes and a brief description and comparison each of the four major auditable standards: GLOBALG.A.P., Safe Quality Food (SQF), PrimusGFS, and BRC.

SCS Global Services: Your Go-To Food Safety Experts

Whether you need information about the latest FSMA updates, to satisfy your customers’ requirements through third-party audits and verification, or to upgrade your internal management systems to minimize food safety risks, we can help. Our professional auditors, scientists, trainers and food safety management experts have been providing comprehensive, high-quality, customer-focused food safety services more than three decades.

Combine your food safety audit with any of our other food and agriculture certification offerings – Organic, Sustainably Grown, and Non-GMO Verified – and earn recognition for multiple achievements cost effectively. SCS auditing, verification, and vendor management services are recognized globally by food producers, major brands, distributors, retailers, and food service providers.

Ask About Our Food Safety Training

SCS operates a full-service Food Safety Training department to answer all of your food safety questions and support your efforts to develop and implement a thorough, effective food safety program. Our convenient training options include live instructor-led or on-site trainings throughout North America and Latin America, real time engaging webinars, and interactive on-line trainings:

- IHA Approved HACCP trainings (live and online)
- GFSI Standards – SQF, BRC, GLOBALG.A.P.
- FSMA Food Safety Preventive Controls for Human Food delivered by FSPCA Lead Trainers

Food Safety Consulting Services

Whether you are a small start-up or an established organization, food safety audits can be time consuming and difficult – this is where SCS Consulting Services Inc. comes in. Our Food Safety Consulting Services provide you with cost-effective premium solutions to meet your Food Safety audit needs and challenges. Our highly technical and expert consultants will guide you through the entire process by educating you on what you need for your evaluation and empowering you to solve any potential issues or violations.

Disclaimer: “Using SCS’ Food Safety Consulting services does not guarantee you a certification or give you an advantage. Our experts are here to guide you through the process but there is no guarantee.”
GMP, GDP, and Harmonized GAP Audits

Retailers and foodservice buyers consider independent verification of Good Agricultural Practices (GAP), Good Manufacturing Practices (GMP), and Good Distribution Practices (GDP) to be an essential baseline of food safety performance when conducting business with suppliers. GAP and GMP compliance are also considered a tangible first step toward more comprehensive certification under a GFSI-benchmarked standard.

SCS provides verification that your food safety practices comply with GMP, GDP, and Harmonized GAP requirements. A comprehensive checklist based on regulatory requirements is used by SCS expert auditors to review your documents, records and implemented food safety processes and procedures, including your HACCP plan as applicable. We can also audit vendors in your supply chain directly, and verify audits conducted by other third parties.

Benefits

Independent verification demonstrates your commitment to food safety, confirms your operation’s food safety practices, prepares you to implement a HACCP or a risk-based preventive controls food safety plan, and puts you on the path to GFSI-level compliance.

If you are at an early stage in your food safety program, a pre-verification audit helps you refine your internal procedures and puts you on the path to compliance with regulatory requirements and GFSI.

Which Standard is Right for You?

**GMP**

For any food processing or packing operation in which food is handled, processed, packed, stored or distributed. Includes verification of your Standard Operating Procedures (SOPs) as well as GMPs, and other relevant food safety prerequisites such as traceability, recall and food defense.

**Harmonized GAP**

For growers or producers of vegetables, fruits, or agricultural feedstocks, both open field and greenhouse, including specialized audits such as the Tomato Food Safety Protocol. Audited under the United Fresh Harmonized Audit Standard. Includes verification of your SOPs as well as GAPs, including traceability, water sourcing and usage, and harvesting practices.

**GDP**

Product storage and distribution practices for food distributors. Includes verification of your SOPs as well as Good Product Storage and Distribution Practices, and other relevant food safety prerequisites such as traceability, recall and food defense.

Audit Process

1. Application
2. Schedule the audit
3. On-Site Audit
4. Audit Report Review
5. Issue Audit Score and Certificate if earned
Global Food Safety Initiative (GFSI)

Global Food Safety Initiative (GFSI) is a global collaborative effort intended to promote the highest standards of food safety. Rather than create a single worldwide standard, the GFSI collaborative established a benchmarking process to encourage innovation and competitive development of standards that would all meet a core set of requirements pertaining to management commitment, risk-based preventive practices, and continuous improvement. GFSI itself does not administer accreditations or conduct certification activities. Such activities are left to administrators of specific food safety standards that are benchmarked to GFSI requirements, and to independent accredited certification bodies who certify against those standards.

Benefit of Certification to Food Producers, Manufacturers and Other Operations

A growing number of retail and foodservice buyers around the world now mandate that their suppliers adopt food safety and auditing systems aligned with GFSI criteria, and favor suppliers who have had their food safety and quality management systems independently certified under a GFSI-benchmarked program. In addition, food companies are increasingly opting to build out their internal food safety programs to GFSI-level requirements to minimize food safety risks.

Core GFSI Elements

The following elements are built into each GFSI-benchmarked standard:

- Senior Management Commitment and Continual Improvement
- Food Safety Plan based on Risk-Assessment
- Annual Scheme Internal Audits
- Supplier Approval and Management
- Corrective and Preventive Actions, Root Cause Analysis
- Layout, Product Flow and Segregation
- Housekeeping and Hygiene
- Management of Allergens
- Process, Product, and Operations Control
- Traceability and Recall Programs
- Labelling and Pack Control
- Personnel Hygiene and Training
- Documentation and Record keeping
- Verification and Validation
- Continuous Improvement
Key Food Safety Features of SQF, BRC and GlobalG.A.P. Schemes

<table>
<thead>
<tr>
<th>Requirement/Standard</th>
<th>GMP</th>
<th>GLOBALG.A.P.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Online Accessibility</td>
<td></td>
<td>globalgap.org</td>
</tr>
<tr>
<td>GFSI Benchmarked</td>
<td>No</td>
<td>Yes</td>
</tr>
<tr>
<td>Standards and Guidance Literature</td>
<td>Hazard Analysis, and Risk-based Preventive Controls for Human Food21 CFR 117</td>
<td>Free on GLOBALG.A.P. website</td>
</tr>
<tr>
<td>Auditor Accreditation</td>
<td>Food Safety Preventive Controls alliance (FSPCA) CFSan TAN</td>
<td>Accredited Education, Work Experience, Qualifications, Audit Training</td>
</tr>
<tr>
<td>HACCP</td>
<td>Subpart C. Hazard analysis and Risk based Preventive controls for covered firms</td>
<td>Required risk assessments are based on HACCP</td>
</tr>
<tr>
<td>HACCP Team/Verification and Validation</td>
<td>Preventive Controls Qualified Individual (PCQI) required for covered firms. Verification required for Preventive Controls. Validation required for Process PCs only.</td>
<td>Not required</td>
</tr>
<tr>
<td>Prerequisite Program</td>
<td>Subpart B. GMPs</td>
<td>Documented GAP program</td>
</tr>
<tr>
<td>Audit Process and Days</td>
<td>Half day to multi-day depending on operation size.</td>
<td>Half-day to multi-day, depending on operation size and distance between sites.</td>
</tr>
<tr>
<td>Period to address non-conformities</td>
<td>Not required. The site must address it for preparation of next audit.</td>
<td>28 calendar days</td>
</tr>
<tr>
<td>Certification Requirements</td>
<td>Questions are scored based on minor, major and critical food safety hazards. Designated persons should attend opening and closing meetings.</td>
<td>Fundamental requirements within the standards must be met. Designated persons should attend meetings. The questions are predefined as major or minor in importance.</td>
</tr>
<tr>
<td>Scoring/Grading</td>
<td>80+ for passing</td>
<td>95%+ minors, 100% majors must be met.</td>
</tr>
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</table>
### PrimusGFS vs SQF vs BRC

<table>
<thead>
<tr>
<th>PrimusGFS</th>
<th>SQF</th>
<th>BRC</th>
</tr>
</thead>
<tbody>
<tr>
<td><a href="http://primusgfs.com">primusgfs.com</a></td>
<td><a href="http://sqf.com">sqf.com</a></td>
<td><a href="http://brcglobalstandards.com">brcglobalstandards.com</a></td>
</tr>
<tr>
<td>Yes</td>
<td>Yes</td>
<td>Yes</td>
</tr>
</tbody>
</table>

**General Regulations and Standard on website**
- **PrimusGFS**: Multiple Codes: Food Safety Fundamentals, Primary Production, Manufacturing, Storage & Distribution, Retail, Quality and Food Packaging
- **SQF**: One standard (includes food safety and quality management systems) Global Market Program for small sites (Basic and Intermediate levels)
- **BRC**: Free on BRC website

**Free on PrimusGFS website**
- **PrimusGFS**: Free on SQFI website
- **SQF**: Free on SQFI website
- **BRC**: Free on BRC website

**Accredited Education, Work Experience, Qualifications, Audit Training**
- **PrimusGFS**: Accredited (approved by SQFI) Education, Work Experience, Qualifications, Audit Training
- **SQF**: Accredited (Approved by BRC) Education, Work Experience, Qualifications, Audit Training
- **BRC**: Accredited (Approved by BRC) Education, Work Experience, Qualifications, Audit Training

**Applicable to all facility operations. Analysis required; critical control points (CCPs) depend on the process.**
- **PrimusGFS**: Food Safety Plan based on CODEX Alimentarius HACCP Principles
- **SQF**: Multi-disciplinary HACCP team employed with a team leader. A competent and experienced SQF Practitioner employed full time to oversee SQF program requirements. External expertise may be used, but day-to-day management of food safety is the responsibility of the company. Verification and validation activities conducted by competent personnel and service providers.
- **BRC**: Multi-disciplinary HACCP team employed, including a team leader with in-depth knowledge of HACCP and demonstrated competence and experience. External expertise may be used, but day-to-day management of food safety is the responsibility of the company. Verification and validation activities conducted by competent personnel and service providers.

**Preliminary steps outlined in standard**
- **PrimusGFS**: Clearly described and defined
- **SQF**: Clearly described and defined
- **BRC**: Clearly described and defined

**Half-day to multi-day depending on size and distance between sites.**
- **PrimusGFS**: Initial Audit (Stage 1 and Stage 2)
- **SQF**: Stage 1: Document Audit
- **BRC**: Auditor Preparation: pre-review of key documents
- Stage 2: Site Audit
- **SQF**: Audit duration is based on number of employees, size of facility, number of HACCP Plans, and any off-site storage areas.
- **BRC**: Announced Audit (mandatory)
- **SQF**: Mandatory unannounced Audit (UAA)-Every 3 years.
- **BRC**: Unannounced Audit (optional)

**30 calendar days**
- **PrimusGFS**: 30 calendar days (minor)
- **SQF**: 30 calendar days (major)
- **BRC**: 28 calendar days

**Minimum score for each module and the overall total score. Overall preliminary score of 85% for GMP. Management or designee must attend opening and closing meetings and participate in the audit.**
- **PrimusGFS**: Mandatory requirements within the standard must be met. Pre-requisite, food safety and/or quality management requirements must be met. Current standard to be made available. Senior management attends opening and closing meetings and participates in the audit.
- **SQF**: Auditor presents findings and reconfirms non-conformities.
- **BRC**: Auditor presents findings and reconfirms non-conformities.

**Preliminary and final percentage of compliance.**
- **PrimusGFS**: Score: Excellent, Good, Comply (Pass).
- **SQF**: Excellent and Good (require annual re-audit); Comply (requires semi-annual re-audit).
- **BRC**: Grades AA, A, B, C, D (pass)
- **BRC**: AA, A, and B (require annual re-audit), C and D (require semi-annual re-audit)

Note: A plus (+) sign added to a grade indicates that an unannounced audit was conducted.
GLOBALG.A.P.

GLOBALG.A.P. certification opens valuable new markets to large and small producers alike, and helps satisfy the basic food safety and sustainability specifications of retailers and major buyers worldwide. Assure your customers that your good agricultural practices for food safety and your environmental management practices meet GLOBALG.A.P. Requirements. GLOBALG.A.P. Integrated Farm Assurance (IFA) standard is recognized in more than 100 countries.

GLOBALG.A.P. certification is suitable for: Agricultural producers, packers, processors

Audit Process

1. Choose Certification Body and Apply for Auditing
2. Complete Registration Form
3. Schedule the Audit
4. On-site Audit
5. Complete Corrective Actions and Technical Review
6. CB makes Certification Decision
7. Receive Certificate

Once certification is achieved, SCS issues the certificate and final report to the facility/operation and posts reports to the SCS Certified Supplier Directory and to retailer databases when requested. Annual audits are required to maintain certification.

Certification Options

SCS offers certification to both the Integrated Farm Assurance (IFA) Standard and Harmonized Produce Safety Standard (HPSS) Standard. The following certification options apply to both standards:

Option 1: Certification for Single Site and Multisite for individual producers of single site or multisite operations with or without an implemented Quality Management System (QMS).

Option 2: Group Certification for small producers seeking recognition under one group certificate, and for multisite operations operating under a unified QMS and internal auditing procedure.

For IFA-only clients, we also offer TESCO, Combinable Crops & Hops.
PrimusGFS

PrimusGFS certification is a leading food safety standard benchmarked to GFSI and accepted by buyers around the world. Its integrated approach allows you to certify both your farm and packhouse operations during the same audit, saving time and money. Primus GFS is well recognized in U.S., Canada, Mexico, Latin and South America.

SCS is approved by Azzule systems, the PrimusGFS standard owner, to perform certified PrimusGFS audits.

PrimusGFS certification is suitable for: Farms, ranches, greenhouses, pack houses, processors, storage and distribution centers, cold storage facilities, pre-processors of plant products, grains, and pulses, processors of perishable plant products and ambient stable products (drying, roasting, salting, milling).

Audit Process

Application
Registration
Self-assessment (OPTIONAL)

Schedule the audit

Onsite Audit
Corrective Actions (CA)
Certification Decision
Certificate Issuance
Recertification

Combined Certifications for Greater Efficiency

Bundle your PrimusGFS with other industry leading certifications, such as: GLOBALG.A.P. (Farm) + PrimusGFS Packhouse.
Safe Quality Food (SQF) Certification

Centered around a HACCP-based food safety plan, SQF certification helps companies in all sectors of the food industry prove that their food has been produced, processed, prepared, and handled according to the highest standards throughout the supply chain. SQF offers two levels of GFSI-benchmarked certification: Food Safety Code, which requires a HACCP-based food safety plan; and Quality Code, which requires all of Food Safety Code elements plus additional quality management system requirements.

The standard consists of distinctive food sector category modules. All operations must comply with Module 2 (System Elements) as well as an additional module that defines the fundamental practices for their specific industry sector. For example, organizations producing fresh produce adhere to Modules 2 and Module 7, which focuses on Good Agricultural Practices (GAP), whereas a company processing fruits and vegetables must adhere to Modules 2 and 11, which focuses on Good Manufacturing Practices (GMPs).

**SQF certification is suitable for:** SQF certification can benefit any food processing or packing operation in which food is produced, handled, processed, packed, stored and distributed.

### Audit Process

- Learn the Standard
- Identify SQF Practitioner
- Complete CB application
- Self-Assessment or Pre-Assessment Audit (Optional)
- Schedule an Audit
- Desk Audit of Documentation (Unscored. For initial certification audit only)
- Facility Audit
- Complete Corrective Actions

Major: completed 30 days from facility audit date
Minor: completed 30 days from facility audit date

- CB makes Certification Decision (45 days from audit date)
- Receive Certificate if earned

### Scoring and certification validity:

Scores E and G result in a 12-month valid certification; Score C results in a 6-month valid certification, with surveillance audit prior to the 6-month term of the certification audit end date. A score of F results in no certification.

<table>
<thead>
<tr>
<th>GRADE</th>
<th>SCORE</th>
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<tbody>
<tr>
<td>96 - 100</td>
<td>E - EXCELLENT</td>
</tr>
<tr>
<td>85 - 95</td>
<td>G - GOOD</td>
</tr>
<tr>
<td>70 - 84</td>
<td>C - COMPLIES</td>
</tr>
<tr>
<td>&lt; 70</td>
<td>F - FAILURE</td>
</tr>
</tbody>
</table>

### Audit Duration

Each audited company is required to have a full-time trained, in-house SQF facilitator, called an SQF Practitioner. The SQF Practitioner is responsible for ensuring that the company and its sites understand the audit process. In the case of vertically integrated, multisite operations where primary production sites are under direct control, certification is more complex and may require extra time.

SQF audits require a documentation or desktop review for the initial audit only, typically 1 to 1.5 days in length, followed by a facility audit of 1.5 to 4 days.
BRC Certification

The BRC Global Standards are used by suppliers in over 100 countries to protect food safety during the manufacture, storage and distribution of food and food packaging materials. BRC Certification helps companies demonstrate compliance with the GFSI and gain access to top EU retailers. **BRC Global Standards include:** Global Standard for Food, Global Standard for the Storage and Distribution, Global Standard for Packaging and Packaging Materials, Global Standard forAgents and Brokers.

**BRC certification is suitable for:** Any food processing or packing operation in which open food is handled, processed, packed, stored and distributed; manufacturing of packaging materials for food. Food and food packaging material manufacturers, brokers, and agents can apply.

**Audit Process**

- Learn the Standard
- Complete CB application
- Self-Assessment or Pre-Assessment Audit (Optional)
- Schedule the Audit
- Onsite Audit (approximately 1.5-3 days)

- Complete Corrective Actions (28 from audit date)
- Make Certification Decision (42 days from audit date)
- Receive Certificate

**Scoring and certification validity:** Grades A and B result in a 12-month valid certification; Grade C and D result in a 6-month valid certification with surveillance audit. Unannounced option “+” is added to score (e.g., AA+)