Third Party Audits and Certifications

NACMPI-August 27, 2008

Mike Robach

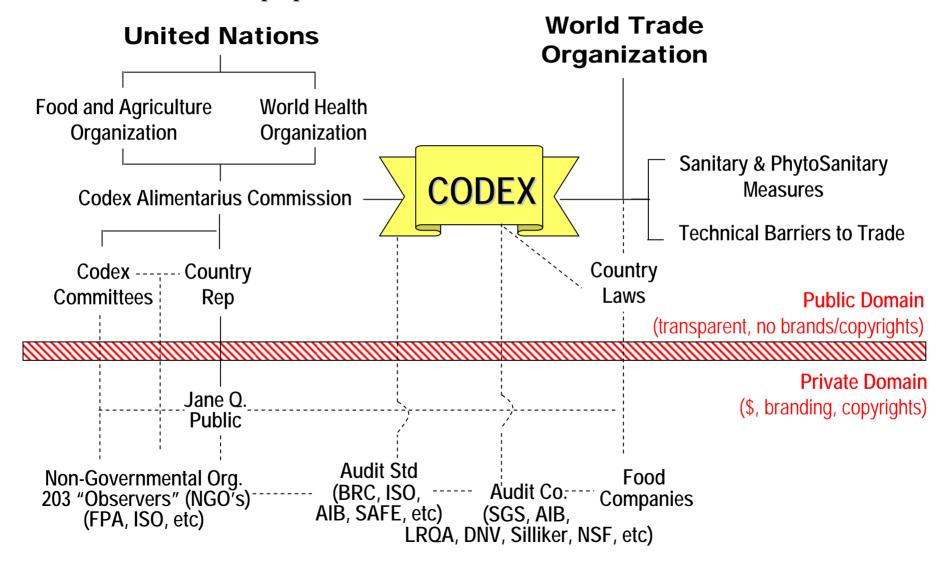
VP, Corp Food Safety and Regulatory Affairs

Cargill

Codex: Food Code

- Protect The Health Of Consumers
 - + Ensure Fair Trade Practices

174 signatory countries = 98% of the world population



Codex

General Hygiene Programs + HACCP

The Law on Food Safety and Our Reference Point

CAC/RCP 1-1969, Rev.4- 2003

INTRODUCTION

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RECOMMENDED INTERNATIONAL CODE OF PRACTICE GENERAL PRINCIPLES OF FOOD HYGIENE

CAC/RCP 1-1969, Rev. 4-2003

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PRINC	IPLES OF THE HACCP SYSTEM	
GUIDI	LINES FOR THE APPLICATION OF THE HACCP SYSTEM	
INTRO	DUCTION	
APPLI	САПОХ	
TRAIN	ING	

Codex is our best tool to:

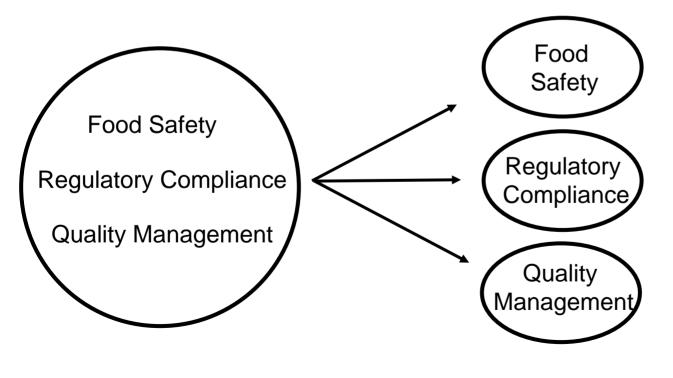
- ✓ Compare/commoditize audits
- ✓ Unite & speak with authority
- ✓ Resist audit proliferation

Commoditizing Audits

Break Audit "Package" Into Components

Each audit strives to be different in its organization and questions, but all have 3 basic components:

To compare & commoditize we must break audits into these 3 components



Codex + other **Defined & Non-negotiable**(Little audit differentiation)

Country laws **Defined & Non-negotiable**(Little audit differentiation)

Quality Systems

Negotiable

(main audit differentiation)

Audit Key Criteria Summary CODEX Key Criteria

Key Criteria not found

Tool for supplier and customer to find and compare audits criteria

Other Key Criteria

☐ Key Criteria not found

Codex	CODEX general principles of food	CODEX general	Girri Geo	Jauy IV.,			AIB Consolidated Standards	to NSF Cook & Thurber	r SAFE GMAVFPA	Silliker GMP &	ISO 22000 :2005	BRC Version	4 Dutch HAACP	IFS Version 4	4 SQF 2000 level 3	3 GFSI G
Section	hygiene (Rev. 4-2003)	principles of food hygiene (Rev. 4-2003)	3) Type	e Sub- Type		Key Words-Items-Criteria	for Food Safety	Food Safety, Quality & Food Defence	& Version 11	Food safety Audit System 2006	1 ,'		Option B: HACCP based Food Safety System			Docu Vers
-	consumous	21.2	GM	2	1	Quality Policy Statement	LB.3	A2	1.1.1		41,52	2.2		2.2	4.1	6.1.2
3.3	PRIMARY PRODUCTION	3.3	FS	1	2	Perimeter and grounds, Physical and	III.A.1.j, N.A	D.	223-24-35	II.A, LC.4, II.F.3,	636472	3.1.2 3.7	1.3	4.8.1, 5.4	4.3.1	622,6
- 1	1	4.2, 5.2,	FS	4	1 3	Chemical Product Contamination Nisk Fabrication-Raw Material Handling	III.A.1			MLB III.B, VI.A		322	22,32,	4.8.4	4.3.1	6.2.10
		4.2,3.4,	"	4	-	Preparation, Processing, Packaging and	(III.)	G.E.s.	£1.1-a	II.D., 1121	0.50.77.2	3.2.2	22,00,	4.0.4	4.2.1	0.4.
4.2_	PREMISES AND ROOMS	4.2	FS	4.1	4_	Storage Areas Floors	N.B.S	C2	2.1	lu B	6.3-6.4-7.2	3.2.2.2	2.2	4.8.4.3	4.3.1	6.2.3
42	PREMISES AND ROOMS PREMISES AND ROOMS PREMISES AND ROOMS PREMISES AND ROOMS	41, 42, 44, 55	FS	1		Internal Environments standards	M.B	0.3	2.1	III.B	6.3-6.4-7.2 6.3-6.4-7.2	3.2 3.1.1	21, 22, 24, 35	4.8	43.1	6.2.2
42	PREMISES AND ROOMS PREMISES AND ROOMS	41,42,44,55	FS	1	7	Location Staff Facilities	III D.2. III D.3	C 2 C 5	2.1	III.B	7.2	3.6	21,22,24,33	3.3	431	622
		4.2	FS	4	8	Walls Windows place	II D 2, II D 3 IV.B 5	0.2	2.1	III.B	636472	3221	2.2	4.8.4.2	4.3.1	6.2.5
42	PREMISES AND ROOMS PREMISES AND ROOMS	4.2	FS	1		Windows, glass Ceilings/Overheads	IR IV.B.5	C.2 C.2	3.5.3	ILC.5	6.3-6.4-7.2 6.3-6.4-7.2	3.2.2.4 3.2.2.3	2.2	4.8.4.5	4.3.1	6.2.5
43	COUPMENT	4.3	FS	2	11	Process Control	IV.C.7	0.1	27.2	VII D			2.3	5.2	431,441	6.3
4.4	FACILITIES FACILITIES	4.4	FS	1	13	Air conditioning/versions-		C 2 C 2	2.1.3	III.B	6.36.4-7.2 6.36.4-7.2	3227 3226	2.4	4.8.4.8	431,441 431 431	6.2.5
4.4	PREMISES AND ROOMS PREMISES AND ROOMS COUPMENT FACILITIES FACILITIES FACILITIES CONTROL OF OPERATION	4.2, 4.4, 6.4	FS FS	1 2	14	Select a k	AN MOR	<u> </u>	32-33	III.A VI.A, VI.B	7.2	3.9	2.2, 2.4, 4.4	4.10	4.3.1	6.2.14
5.0	CONTROL OF OPERATION	5.1	Fa	4		TO TO TO TO	CA MACI	9			1 1	5.1	3.1	5.7		
5.1 (5.2 k	KEY ASPECTS OF HYGIENE CONTROL	51,52,92,93 L 52	FS	3	16 17	Pastertive Clating - Food Handless and	II.F	В.	3.1	I.A.	7.3, 7.10, 8.3, 8.5.1	1.	3.1, 3.2, 7.2, 7.3	1.2	4.3.1	6.3
52 p	KEY ASPECTS OF HYGIENE CONTROL SYSTEMS	6.2	FS	4 17	۱ "	Protective Cloting - Food Handlers and Others Working In or Visiting Food-handling	, M.F.	D.7 ,	2.5	[v. ,	7.2	6.4	3.2	3.2.1	4.3.1	6.28
- 1	KEY ASPECTS OF HYGENE CONTROL	1	FS	4.	18	Azeas	III.B.4, III.D.1	G.4	3.5	VILB	7.2	4.3	5.2	5.5	431	6.2.9
	SYSTEMS															
5.3	INCOMING MATERIAL REQUIREMENTS	5.3	FS	2	19	Specifications	LH	F.2	4.1	IIA2	7.3	2.11.2	3.3	4.1-4.2	4.2, 4.2.3	6.1.9
5.3	INCOMING MATERIAL REQUIREMENTS	5.3	FS	2	20	Stock Rotation	III.A.1	111	2.7.6 - 2.7.7	VI.B	7.2	4.6	3.3.3	4.12	4.3.1	6.2.11
			100	۱ ټـــ						,	·	1.0				2.10
5.4	PACKAGING WATER	54,82	FS	4	21	Services, water	II.A.1 IV.D	H.1	2.10	ILA IILB, VIILA	7.2 6.3-6.4-7.2	3.3	3.4, 6.2 3.5	4.5	4.3.1	6.2.18
5.6	MANAGEMENT AND SUPERVISION	5.6	FS QM	1 2	22 23 24	Management Commitment Documentation Control	18.4	A9	2.15 - 5.2		51,561,851	25,26	3.6	2.2	4.1	6.1.5
5.7	DOCUMENTATION AND RECORDS DOCUMENTATION AND RECORDS	67	QM QM	4 2	24		LP.2 LC, LL, LP.1	A8	4.6	IA1	42	2.11.1	3.7	1.6	451	6.1.10
5.8	RECALL PROCEDURES	5.8	FS	2	25 26	Management of incidence, Product	LM	A4, A10	2.12.4 - 2.12.5 - 2.13	3 1.1, .12,	5.7, 7.10.4	2.14	3.8	5.9	463	6.1.19
6.1	MAINTENANCE AND CLEANING	- C 4	FS	4	27	Withdrawal and product Recall Equipernt, cleaning	LE. LF. II.C.1, IV.C	C7.D	214-222-211	I.E. II.G. II.C. VII.A.	7.2.82	3.4		4.15	43.1	6.2.6
	1	6.1	1	4.				C.7. b		VII.B	7.2.8.2	100	4.1			
- 1		6.1, 6.2, 6.2	FS		28	Housekeeping, sanitation, cleaning and Hygiene	LC, LE, III.C.1, III.C.3, V. A, V.B, V.C, V.D, V.E, V.F	C2,D	2.2.1 - 2.2.4 - 2.2.5	ILA5, ILD, VILA, VILB	7.2	3.8	4.1, 4.2, 4.2	4.9	4.3.1	6.2.12
63	PEST CONTROL SYSTEMS	6.3	FS FS	4.	29	External Environments standards	IV.B.1	E2	2.1.2	II.A	6.3-6.4-7.2	3.1	4.3	4.8.2	4.3.1	622
6.3	PEST CONTROL SYSTEMS PEST CONTROL SYSTEMS	6.3	FS	4	30	Pest Control	I.A, II.B IV.B.10	E	2.3	ILC, IV	7.2 6.36.47.2	3.10 3.2.2.5	4.3	4.11	4.3.1	6.2.15
7.0	PEST CONTROL SYSTEMS ESTABLISHMENT: PERSONAL	7.1,7.2,7.3,7.4,7.5	FS FS	++	31		IV.B.10	D.7	2.5	I.B.2, I.B.3, V.	7.2	6.	5.1, 5.2, 5.3, 5.4,		4.3.1	6.2.19
7.1	HYGIENE HEALTH STATUS	7.1	FS	4-	33	Medical Screening	IIF9		2.5.6				5.5	- 22		- 1
7.1 8.0 9.0	HEALTH STATUS TRANSPORTATION	7.1 8.1,82,83 9.2,93	FS	4	34	Transport	ILF.9 ILA.1, ILB.3, ILB.6, ILE	F.1, F.5, L4	25.6 27.3 - 27.4 - 27.5	VI.A	7.2	3.11	6.1, 6.2, 6.3 7.2, 7.3	4.13	4.3.1 4.3.1 4.3.1	6.2.19 6.2.18
9.0	PRODUCT INFORMATION AND	9.2, 9.3	FS	1	34 35	Allergen	II.D.7	G.6	3.4	LD	7.3-7.4	4.2	7.2,7.3	4.20	4.3.1	6.3
9.1	CONSUMER AWARENESS LOT IDENTIFICATION	19.1	FS	1 2	36	Traceability	IH.	16	2.12.1 - 2.12.2 -	ILE.4, ILI.3,	7.9	2.13	7.1	4.18	4.6.1, 4.6.2	6.1.17
		10.1, 10.2, 10.3, 10.4			37	Training-good manufacturing practices - Raw material Handling, Preparation, Processing, Packaging and Storage Areas	IF, IK, III 8.1, III F	A3, D.7	2123	I.E. II.B	6.2	6.1	8.1, 8.2, 8.3, 8.4		4.1.4	6.2.20
				4	-							_	_		_	4
- P	(/		FS	411	38	Layout, Product Flow, Segregation and Traffic control	III.A.1, III.D.5, III.D.6	C.2	2:16	I.B.1	6.3-6.4-7.2	3.2.1	5.5.1	4.8.3	4.3.1	6.2.4
-	·		GM	4.	39	Ressource Management	NA, NB, NC, ND,	A,B, C, D	1.1	1, 1, 11	6.1	2.8		3.1	4.1	6.1.7
		-	FS QM	1 2	40	Back Flow Complaint Handling	IV.D	C.1 A.11	2.1.6 4.9.1	III.B II.14,	7.2 8.6.1	2.15	31	6.8	4.3.1	6.2.5
	F	F	GM	1 2	41	Control of Non-conforming Product	IN, II.A.1	G.7	27.8 - 4.4 - 4.7	I.C	7.10.3, 7.10.1, 8.4,	4.8	5.9.1	5.10	4.3.3	6.1.17
$\overline{}$		1.	QM	4 2	43	Corrective actions	LC, LP.3	D.9	4.4	LF.3	8.5.1 7.2, 7.10.2, 8.4.3,	2.12	5.9.1	5.11	432	6.1.12
	L									,	8.5.1	12.12		5.11	4.3.2	0
-			QM RC	2	44 45	Customer Focus Food Legislation, regulatory	18.4 1A	A11	4.9 5.2		51,56 7.423	2.6	5.1.1,5.2.1	2.4	121	61.7
\rightarrow	į.	+	QM	4 2	45 46	Food Legislation, regulatory General Documentation Requirements	LA LP.2	A5 A2, A6	5.2 4.6	II.A	4.2	2.11	5.2.1	1.5	4.5.1	6.1.8, 6
ب		4	FS	4 2	47	GMO	<u></u>		<u> </u>		7.3	-		4.19	-	6.2.17
=	F	-	GM GM		48	Internal Audit	ic	A8, D9	4.10	IIA5	7.8,84 51,56.2	2.9	5.11	5.1	4.4.2	6.1.11
=			QM QM	4 2	49 50	Internal communication	184	-	1.1		51,562	2.4.3	1	21,324	4.1.1	227
	<u></u>	+	RC		50	Maintenance, preventive plan maintenance Management of regulatory inspection	LD, LS, M.C	C.9	5.3 5.3	ILG	8.2	3.5		4.14	4.3.1	6.2.1
	4	1	QM			process	122				5001051	12.7	-10	2.3		216
$\xrightarrow{\cdot}$	<u></u>	-	QM QM	1 ×	52 53	Management review Organisation Structure, Responsability and	(B3 (A.18.1	A1	1.1.4 - 4.8	ILA1	58,84,851 54,55	2.4	5.1.6	2.1	4.4.3	6.1.6
					54	Management authority, job description	IR t				, , , , , , , , , , , , , , , , , , ,	f		1		
-		+	QM FS		55		IB.1	A2, A6 J.	2.9 - 4.3	IIA1 IIH	8.5.1	2.11.3	5.6.2, 5.12 3.3.2	6.7	431,441,445	6.1.10 5 6.1.21
=	F		FS FS	2	55 56 57	Product Control, good laboratory practices Product design / Development	LJ LG.1, LG.2, LG.3, LG.4,	R		I.A II.E.2, II.E.3	5.6.1	4.1	5.2	4.3	431	6.3
ال آ	(/					Product Inspection and Analysis	LG.1, LG.2, LG.3, LG.4, LP.4, LT, II.A.1				· · ·	4.5	3.3.2	5.7		6.1.21
	F		FS	2	58 50		IIA1.m	F.3, 15		II.A.3	7.10.3	4.7	5.8.2	5.6	4.4.6	6.1.14
-		[GM GM	$\frac{1}{2}$	60	Purchasing Quality Management System- General	I O	F2 A2	3.2 - 3.3	I.E.	4.1, 5.3, 8.5	2.10	6.6.1	1.1	4.2.2	6.1.16
						requirement								4		-
, ' J	í ·	F	QM		61	Quality Manual (includes food safety manual)	18:2	A2	1.1.2	EA.	4.2	2.3		1.3	4.1.2	6.1.3
-	F		QM		62	Quantity Control		H2 '	4.2	-	8.4	5.2		5.3	<u> </u>	
- P	r ·	F '	QM		63	Supplier approval and performance monitoring	LO			I.E	8.4	2.10.1	5.6.2	4.6	4.2.2	6.1.16
,	į.	ļ	FS	3	64	Handling Requirements for Specific	LG.5, III.A.1.k	F.6	2.9.3	I.C., I.D.	7.2	4.2	5.2.1	4.7	4.3.1	6.3
	+	1	FS		65	Materials Calibration and Control of Measuring and	N.C.7		2.14	I.F.2		53	5.8.1	4.17	4.3.1, 4.4.1	6.1.20
1	í'	i	Tu-	<u>4:</u> :		Monitoring Devices	N.U.7				8.2	5.3	5.8.1	4.17		0.1
			RC RC	4	66	Bioterrorisme regulation, Food Defence		K A7	2.14	LF.1, IX. A			4		4.3.1	_
`—			No	4-	br	Change management		(A7	2.13				-		_	+
\equiv						# of CODEX missing key elements	s 0	1	1	3	0	0	1	0	0	4
							4	4	4	8	3	- 5	12	4	6	
					L	# of OTHER CRITERIA missing Key elements							38	200	700	
					Codex	37	37	36 97%	36 97%	34	37	37 100%	36	37	37	Τ,
				ŧ	Codex %	# of OTHER CRITERIA missing Key elements 100%	37 100%	36 97%	36 97%	34 92%	37 100%	37 100%	36 97%	37 100%	37 100%	_

Audit Key Criteria Comparison Summary

Number	CODEX	AIB	NSF	SAFE	Silliker	ISO	BRC	Dutch	IFS	SQF	GFSI
of	G eneral	Consolidated	Cook &	GMA	GMP &	22000	Version	HAACP	Version	2000	Guidance
Criteria	Principles of	Standards for	Thurber	Version	Food	:2005	4	Option B:	4	level 3	Document
	Food	Food Safety	Food	11	Safety			HACCP			Version 5
	Hygiene		Safety,		Audit			Based			
	(Rev. 4-		Quality &		System			Food			
	2003)		Food		2006			Safety			
			Defence					System			

CODEX: 37 Criteria

37	37	37	36	36	34	37	37	36	37	37	37
%	100%	100%	97%	97%	92%	100%	100%	97%	100%	100%	100%
_	Avg non-GFSI benchmarked audits						A۱	g GFSI be	nchmark	ed audits	37
										99%	

Avg All
<u>Audits</u>
36
98%

ALL 67 KEY CRITERIA: (Food Safety, Regulatory, Quality Management)

ALL OI I	ALL OF THE FORTERIA: (FOOD Guicky, Regulatory, Quanty management)													
67	37	63	62	62	56	64	62	54	63	61	61			
%	55%	94%	93%	93%	84%	96%	93%	81%	94%	91%	91%			
'		Avg non	-GFSI be	nchmarl	ked audits	61	1 Avg GFSI benchmarked audits							
						92%					90%			

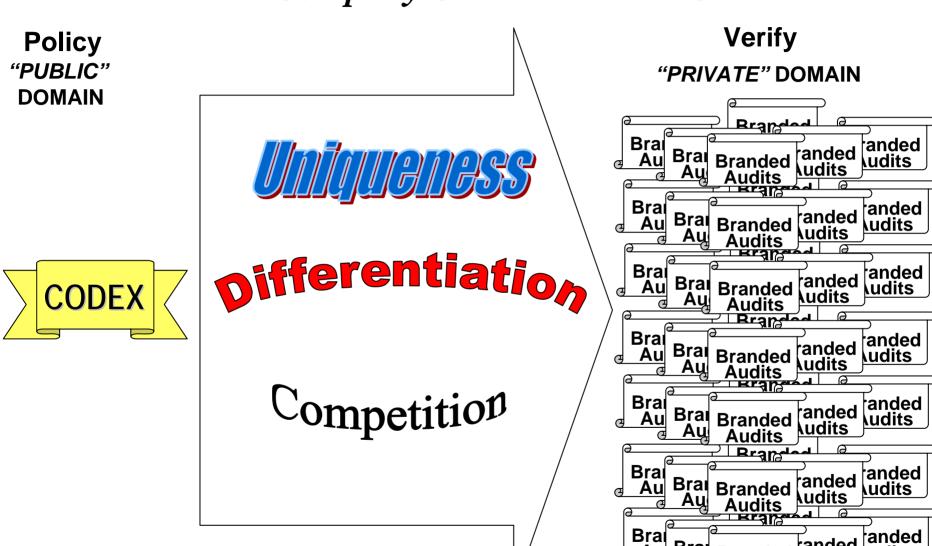
Avg All
<u>Audits</u>
61
91%

GFSI has 3 key rules affecting typical US audits

- 1- (ownership) Audit standard must be public for anyone to audit (this rules out AIB, Silliker, NSF, etc)
- 2- (accreditation) Audit bodies must be accreditation to international standards
- 3- (qualifications) Auditor must be qualified to international standards
 - * GFSI has not said AIB, NSF, SAFE, Silliker do not meet the GFSI key elements criteria

Current

Each Audit Company Can Have Their Own Audit



randed Audits

Branded

udits

Global Supply Chain

Needs A Place and Process to Agree on Standards

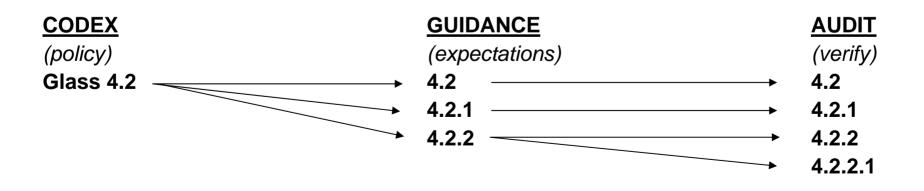
Verify **Policy** "PUBLIC" "PUBLIC" **DOMAIN DOMAIN AUDITOR** CODEX **Global Supply Chain AUDITOR AUDITOR**

Transparency

Organization and Numbering as Differentiation leads to Confusion

Key Words-	Codex	AIB	NSF	SAFE	Silliker	ISO 22000	BRC	Dutch	IFS	SQF	GFSI
Items-Criteria	Section	Consolidated	Cook &	GMA/FPA	GMP &	:2005	Version 4	HAACP	Version 4	2000	Guidance
		Standards for	Thurber	Version 11	Food			Option B:		level 3	Document
		Food Safety	Food		safety			HACCP			Version 5
		-	Safety,		Audit			based			
			Quality &		System			Food			
			Food		2006			Safety			
			Defence					System			
Windows, glass	4.2	I.R	C.2	3.5.3	I.C.5	6.3-6.4-7.2	3.2.2.4	2.2	4.8.4.5	4.3.1	6.2.5
, g	-				3.0			I			

Transparence to CODEX is needed in a global supply chain



Audit Equivalency Competition and Choice

Promote audit **equivalency** (not brands) based on an agreed on global supply chain guidance document

Equivalency of audits should reduce redundancy and costs.

Give suppliers a choice of equivalent audits to choose from, not a mandate.

We need a process and place for the global supply chain and all stakeholders to agree on equivalency

Audit Equivalency

- Codex-based criteria
- All stakeholders represented
 - Industry (originators, processors, retailers, food service)
 - Government
 - Consumers
 - Inter-governmental agencies (WOFP?)

Audit Equivalency

- Science-based standards
- Government recognition and oversight
- Focus on systems and outcomes
 - GAP, GHP, HACCP
- Accreditation systems
 - Benchmark audits
 - Certify auditors

New Thinking for a Sustainable Global Food Safety System

- International standards and policies based on sound science
- Strategies to ensure supply chain continuity
- Improved risk management options
- More robust food system protection
- Transparency