



To: Global Food Safety Initiative
From: International Federation for Produce Standards
RE: Designation of High-Risk Foods or Activities for Multi-site Certification (GFSI v2020)
22 January 2021

To Whom it May Concern,

These comments are provided in response to the clause 6.28 in the GFSI Benchmarking Requirements Part II: Requirements for the Management of Certification Programs, amended as part of [the GFSI v2020 update](#) to prohibit “high-risk” crops or activities from being eligible under multi-site certification.

The International Federation for Produce Standards (IFPS) is composed of national produce associations from around the globe. The long-term objective of the federation is to improve the supply chain efficiency of the fresh produce industry through developing, implementing and managing harmonised international standards.

Five Certification Program Owners (CPOs) are currently recognized through GFSI for B1-Farming of Plants certification programs. Those CPOs managing group certifications must individually amend their programs to align with this change.

The concept of “high-risk” foods is not a new one. Even now, the U.S. FDA seeks comments on a proposed traceability rule that defines traceability requirements for select food products designated on the Food Traceability List (FTL). We recognize this requirement came directly from Congress as written in section 204(d)(2)(A) of the Food Safety Modernization Act, and we appreciate the methodological approach use to develop risk-ranking model when identifying foods included on the FTL. Despite this, IFPS firmly believes that no food is inherently high-risk and that the potential for contamination are more appropriately ascribed to handling practices rather than to the commodity itself.

If GFSI remains resolute in the inclusion of clause 6.28 in its v2020 benchmarking requirements, we recommend this high-risk designation be decided from GFSI leadership with input received from a broad group of stakeholders representing different commodities, operation sizes, and growing regions, rather than placing the responsibility on individual CPOs.

Similar to FDA’s approach, we recommend GFSI consider these general criteria when designating risk of farms/commodities excluded from the group certification:

- Size of the group
- Contract structure of the group
- Audit results of the group

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- Performance of the group over time
- Product group food safety risk profile, including:
 - Past history and/or frequency of outbreaks
 - Severity of illnesses
 - Likelihood of widespread or point source contamination
 - Availability of industry or consumer processing interventions (e.g. cooking) to reduce risk
- Country of origin

As this new clause is currently being implemented without these guidelines, we've found this has led to differences in certification program owners' high-risk designations. Some programs identify specific commodities alone as high-risk, without any publicly noted consideration of the additional criteria, while others include both commodities and activities in their risk classification. Again, additional considerations related to the specific group being certified is not addressed. Examples of this are included below:

- [GlobalGAP IFA v5.3](#) - High-risk products required on annual inspection schedule (no multi-site sampling)
 - fresh herbs
 - leafy greens
 - lettuce
 - romaine
 - spinach
 - arugula/rocket
 - berries
 - cantaloupe melons
- [CanadaGAP Program Management Manual, Version 8.0 2020](#) - Risk level 4 not allowed for group certification sampling. Annual audits required. (*note*: additional commodities listed as Risk level 3 and 2, which allows group certification with levels of increased sampling)
 - packing of any commodity (excluding field-packing of certain crops, see Appendix III.3)
 - using potable water post-harvest on any commodity (as opposed to dry handling of product)
 - production or storage of cantaloupe
 - production or storage of leafy greens and herbs (including all lettuce, green onions, leeks, leaf of root crops, leafy crops such as kale, chard, chicory, etc.)
 - production or storage of strawberries

While we are supportive of efforts to identify and monitor high-risk practices, we identify a number of challenges with the designation of high-risk by commodity and with the GFSI initiative as it is being currently implemented, and we ask for consideration of the following:

- As shown above, leaving development of a high-risk list up to the discretion of multiple CPOs can lead to differences in perception of high-risk – why does GFSI not take the lead in developing a list of high-risk practices for all CPOs?
 - If one CPO doesn't allow group certification for a commodity, what is to stop a group from choosing a different CPO?
- What is the key problem/concern being solved by the high-risk designation – does GFSI feel that group certification is inherently riskier, so some growers should be ineligible? Can it be achieved

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- through any means other than a list of high-risk commodities?
- If based on microbiological challenges and outbreak history alone, this will change over time as new and emerging pathogens are discovered, and as industry practices shift.
 - How often will the high-risk criteria be reassessed by CPOs?
 - Is it possible for commodities to be removed from the high-risk list?
 - Are there steps that individual groups can take to become an ‘exception’ to the high-risk list and thereby be allowed group certification with audit sampling?
 - How recent of outbreaks and other data will be considered for high-risk designation?
 - Data from twenty years ago likely would not be representative of today’s mainstream fresh produce production practices. For example, Hepatitis A in green onions may have once been considered a high risk, even if never linked to an illness again because practices had changed. On the other hand, whole onions have previously been considered low-risk, until the summer 2020 *Salmonella* outbreak sickening >1000 individuals in the US.
 - Rather than obtaining individual certification, the change could result in several small growers dropping their certification due to financial and logistical boundaries
 - We are aware of the current working group tasked with continuing the discussion on and clarifying high risk considerations for all commodities, however we recognize this group was originally formed to address leafy-green specific issues
 - This leafy greens working group is set to end (and presumably provide deliverables) in October 2021, yet high-risk designations have been implemented by CPOs as early as February 2020
 - Designating entire commodity groups as high risk would have the consequence of damaging both buyer and consumer confidence, potentially dooming efforts by any company included in that designation to demonstrate the safety and reduced risks of their food safety practices.
 - For commodities such as leafy greens, designation as high-risk would categorize both conventionally grown lettuce with that grown in indoor environments, despite the markedly different production practices and associated risks.
 - Designation of high-risk ignores the fundamental purpose of Good Agricultural Practices – that the produce coming from compliant operations will not be high risk
 - Audits are intended as *verification* of food safety practices/systems. While they encourage and support good food safety, the audits themselves are not the program. Food safety should not be considered compromised because it doesn’t undergo a 3rd party audit each year.
 - Similarly, certification is no guarantee that food safety systems are being implemented and effective 100% of the time; outbreaks and recalls are still a possibility.

We appreciate your consideration of these comments and look forward to further discussion.

Best regards,

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