

THE IMPACT OF COVID 19 PANDEMIC ON THE GFSI FOOD SAFETY STANDARDS SCHEMES AUDITS

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Abstract

The global COVID-19 outbreak has a major effect on food safety management and assurance of food safety in all retailers and manufacturers. The industry understood that COVID-19 outbreak has created and continues to create audit restrictions, which already have severe impact on the certification status of certain sites. As a result, Global Food Safety Initiative (GFSI) released numerous statements focusing on business continuity, while Certification Programme Owner (CPO) and Certification Body's (CB) would have to comply with requirements of the national regulations applicable to the management of the COVID-19 pandemic. Furthermore, as part of the ongoing support for food businesses facing certification obstacles / inconvenients, GFSI made available the harmonized risk assessment, although till now there are no scientific evidence that the virus is transmitted by food in the context of last months.

Key words: COVID-19 pandemic, GFSI, certification

INTRODUCTION

Multiple food safety crises have made headlines over the last few decades, eroding customers' confidence in the food they purchase, the products they love, and even the food industry overall. The identification of Coronavirus at the end of 2019 has had a broad impact on almost all areas of food industry practices, from manufacturing to customer purchasing patterns to in-restaurant dining alterations. This year will be known globally as the year that altered almost every aspect of all types of activities, including conformity assessment. As a consequence, the issue that emerges is what relation exists between this topic and GFSI? [2].

When the food industry created the Global Food Safety Initiative (GFSI, year 2000), it was intended to establish a benchmark for standards to ensure customer trust in the supply of healthy and high-quality food worldwide. Thus, the pressing issue is how well-designed these standards were in

order to maintain food safety in the food chain and cope with the Coronavirus (Covid-19) pandemic situation, both during and aftermath. So, we can say that in 2020, GFSI became a „Coalition Of Action”, a new approach towards collective impact. Why?, because food operations from worldwide experience the effects caused by this pandemic crisis [4]. As highlighted in Fig. 1, it's clear that only few places are not affected in a such dramatic way, and still, globally, Covid-19 pandemic has fundamentally affected the management and assurance of food safety in all retailers and manufacturers.

According to *covid-19.geo-spatial.org*, in Romania, the daily number of new reported Covid-19 cases at 04.10.2020 seem to maintain an upward trend (Fig. 2). It continues to create audit restrictions, which has an impact on the certification status of certain sites.

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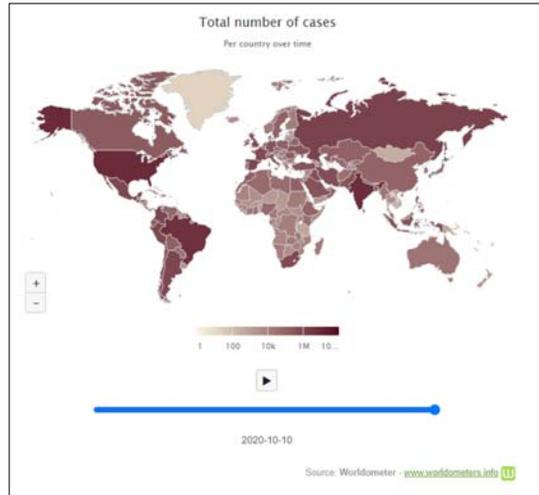


Fig. 1 Worldwide map of Covid-19 Cases overview till now [10.10.2020]

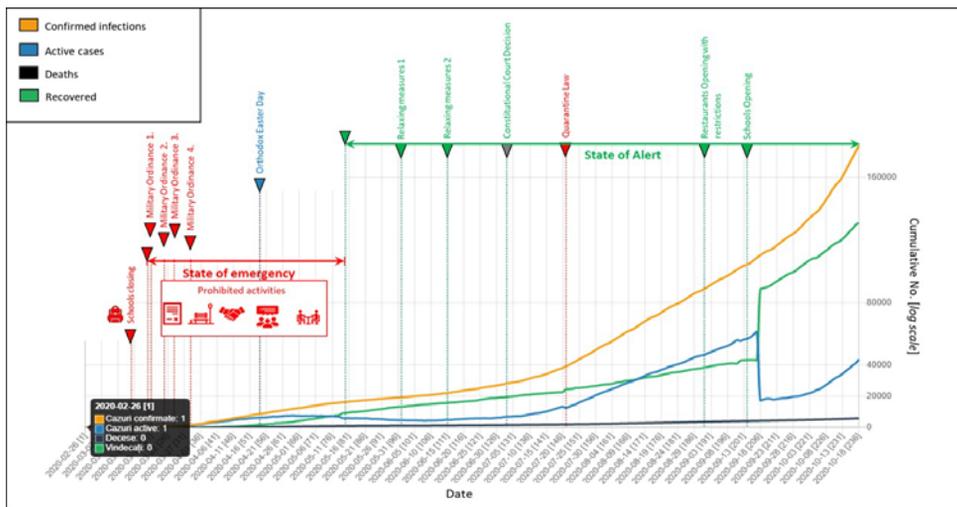


Fig. 2 Romania Covid-19 cases overview till now [04.10.2020]

Till now, this means that about 19% of certified organisations have been affected in their certification plans so far this year.

As a result, the purpose of this paper is to explain how GFSI food safety standards, such as BRCGS, IFS, or FSSC22000, can help to ensure food safety during the current crisis, as well as the solutions found for the difficulties situations of conformity assessment limitations [5.]

I. GFSI FOOD SAFETY STANDARDS ASSESSMENTS

The Global Food Safety Initiative (GFSI) is a landmark initiative, a watershed moment, for The Consumer Goods Forum (CGF), a global industry network dedicated to support Better Lives Through Better Business. So, if we ask what is the purpose of awareness and if we go back to the fundamentals, it can be said that building consumers' trust in the food they purchase, regardless of where their food comes from or where they live, by improving food safety management practices, is what matters the most.

To address this, GFSI has published a set of statements on minimizing the effect of Covid-19 pandemic on GFSI recognized assessments and certification [3, 4]. This was designed to provide clarity on the options available to certified organisations and others pursuing certification for the first time on the alternatives open to them when complete onsite audits may not be possible, most of the options referencing the following:

- for food operators who have proven safety records, GFSI granted extensions of the certificate up to 6 months based on a risk assessment defined by the Certification Programme Owner (CPO) and carried out by your Certification Body (CB). This gives a bit more time to mitigate any temporary restrictions in travel and auditor's availability;
- also, for those unable to coordinate an on-site audit and renew their current certification before its expiry, GFSI enhance the use of a food safety risk assessment;

The documented risk assessment shall as a minimum include:

- major improvements after the previous audit (e.g.: HACCP plans, product recalls and significant complaint levels);
- status with regard to priorities and core process results, management review, and internal audits; here it is expected that certified organizations increase the frequency of internal audits in support of the Food Safety Management Systems (FSMS) and to maintain food safety;
- pending compliance activities / legal proceedings;
- whether the organization is operating to the scope of certification;
- any changes to processes or outsourced services as a result of the Covid-19 pandemic;
- emergency preparedness and response, including the impact of the Covid-19 on the supply chain of the organization and the potential impact on resources and food safety;
- taking into consideration the difficulties encountered by certain sites due to seasonality or continuing restrictions, GFSI encourages constructive communication with key customers and the identification of alternative information to demonstrate conformity;
- another option is to apply for a remote audit, many GFSI recognized Certification Programmes incorporating already the latest GFSI Benchmarking Requirements on the usage of Information and Communication Technologies (ICT) into their audit protocols, giving the opportunity to consider applying for a partial remote audit.

As a direct result, we propose to answer the following questions in this paper:

Q1 Does Covid-19 outbreak have an impact on the certification status of organizations due to audit constraints?

No, although the current Covid-19 pandemic may impact the capacity of the CBs to complete scheduled audits. However, as mandated by current regulations, industry standards, and CB's own policy, the health of auditors and organization employees is a top

priority. As a result, GFSI issued specific guidance for CBs on how to manage postponed audits and certificate validity extensions.

Q2 Is it allowed to use remote audit ICT technology to maintain the validity of CB certifications during the Covid-19 crisis?

Yes, GFSI allows the usage of ICT tools while maintaining a thorough audit. The ICT audit phase is a two-step process, beginning with a remote audit focused on record analysis and ending with an onsite audit to ensure compliance with the scheme requirements. It is critical to remember that this is an alternative but voluntary option and requires the mutual agreement of the certified organization and the CB.

Q3 Can the Coronavirus pose a food safety risk?

The European Food Safety Authority (EFSA) has stated that there is no evidence to assume that food is a likely source or route of transmission of the virus. The WHO has confirmed this statement in their Covid-19 and food safety: guidance for food businesses on 7th April 2020.

Q4 Is food safety at risk due to audits which cannot be performed anymore?

No, additional measures have been put in place to ensure food safety and the integrity of schemes certification. Where it is not possible to access the premises of a certified organization, the annual audit may be postponed or the certificate validity extended based on a risk assessment. The risk assessment focuses on the certified organization's ability to deal with the current pandemic, the measures taken to ensure food safety is not compromised, so the food safety management system is operating effectively and to ensure continuous compliance with Scheme requirements.

Q5 How does CB's continue to assure compliance of certified organizations with Scheme requirements?

To maintain the integrity of certificates issued by the licensed CBs, the CPO are in close contact with the partners, namely industry CBs and Accreditation Bodies (ABs), monitoring daily the global situation to define actions to be taken. GFSI is committed to regularly review the situation

and to provide updates on the options available in these unpredictable times, specifically for the organisations whose certification is lapsing.

Through the question: how are GFSI food safety standards certification and recertification conducted now during the Covid-19 pandemic?, numerous practical nature considerations come into play, described in the second part.

II. PRACTICAL CHANGES AT FOOD BUSINESS OPERATORS GFSI FSMS ASSESSMENTS

The GFSI global food safety standards were created to specify the food safety, quality, and operational criteria that must be in place within a food manufacturing company to meet regulatory compliance and customer protection obligations.

Certificated food businesses operators must provide a thorough understanding of the products they manufacture, distribute, and sell, as well as processes in place to identify and control significant product safety hazards. Two key components of the standards are senior management commitment and a HACCP - based system that outlines a step-by-step process for managing food safety risks. Considering this, businesses who are already compliant with the standards would be in a solid position to define, evaluate, and respond to the new threats associated with outbreak through a risk analysis. Extra measures must be layered into an FSSC / IFS / BRCGS approved operations, in accordance with these standards requirements, to maintain food and employees safety [1, 3, 6, 7], as will be discussed below. It's becoming extremely necessary for sites to have a focused leadership team to manage Covid-19 processes. Due to the ever - changing scenario, the team should meet periodically to review and update the Covid-19 processes as required, in concordance with government advice, staff sickness and customer requirements. There should be increased emphasis on critical control points (CCPs). For example, in the event of absenteeism, replacement personnel should be identified and trained to manage / handle CCPs, along

with clear identification of CCPs within the production environment for the benefit of new employees.

During this time period, emergency suppliers and raw material / ingredients approval procedures are essential, as sites may be unable to access them from their usual suppliers. Food operators' businesses may need to consider alternative methods of approving raw material suppliers in situations where audits are not feasible. They'll also need to consider expanding the requirements for approving the raw materials themselves, which may include further testing and inspection (phisco - chemical, microbiological, sensorial tests).

Furthermore, good communication with the site and its customers is critical; all changes to raw materials or suppliers should be reported to brand owners and authorised before usage, if necessary.

Another oversensitive topic is food defense. Owing to the likelihood of sites hiring a large percentage of temporary workers as a consequence of increased absenteeism, food defense plans should be reviewed with a focus on mitigating any increased vulnerability.

The issue that emerges for the prerequisite programs is how do production facilities manage cleaning, hygiene, maintenance and related programs? For example, since maintenance service providers could become unable to access the facility, plans should be reviewed to define minimum maintenance levels needed acceptable to run the plant safely and efficiently (without unacceptable increased risk of breakdown). Where scheduled maintenance plans have been limited, items with a documented probability of failure and subsequent contamination risk should be identified and reviewed on a regular basis. Where specialized engineering companies are used, they must be strictly monitored and controlled in compliance with the Covid-19 visitor policy for the respective sites.

Similarly, pest control technician visits could be decreased. Any amendments to pest controller access for regular visits should be based on pest risk, taking into account the pest management background of the facility,

the items treated (rodents, crawling, flying), the intrinsic risk of pest infestation, and seasonal factors. If pest controller activity is limited as a precaution, compensatory internal monitoring and pest reporting protocols should be implemented.

Cleaning activities should be reevaluated to include the selection of hard surfaces that can facilitate coronavirus transmission, such as door handles and utensils. Additionally, sites may also need to increase environmental production monitoring and inspections throughout changeover/startup to manage the output of changed cleaning processes.

Employee protection is a sensitive topic, but one that must be clearly described as critical throughout this time frame [8, 9, 10, 11]. To facilitate this, sites should have a clear policy regarding the acceptance of visitors, both general and subcontractors, such as pest control, service engineers, contract cleaners, and vehicle drivers. Where visitors are accepted on site, protocols should be in place to inform them of the site's Covid-19 management policy rules and to ensure they are not experiencing Covid-19 symptoms or pose a Covid-19 danger to employees prior to acceptance on site. Consequently, they should be provided with protective equipment that is required for site access and exposure.

Additionally, each site should ensure that its activities are handled in such a manner that cross-contact threats to workers are reduced. This could require transportation to and from locations where company-owned vehicles are used. It also involves management of communal facilities, including changing areas, restrooms and bathrooms, shift start and changeovers.

Other extensive key factors include work arrangements within production, packaging, and storage facilities, staff movement within production areas, and the usage of panels to isolate employees on lines where social distancing is impossible. Where the risk assessment has identified the need for the use of personal protective equipment to minimize the risk of coronavirus transmission, it shall be given to all employees and authorized permitted visitors.

Finally, although Covid-19 virus is not known to be transmitted through food, the concept of medical screening should be expanded, and all employees should be tested daily for signs of coronavirus infection prior to beginning operation, which could require temperature monitoring and fit-to-work declarations.

If an employee tests positive for Covid-19, it should stay home and quarantine themselves according to government guidance. Besides this, GFSI food safety standards require food business operators to have procedures in place to ensure that employees, agency staff, contractors or visitors are not a sources of transmission of foodborne diseases to products [12].

Taking into consideration all these measures, we may conclude that the actors in the food sector are fighting this crisis on a collective front by updating and mitigating it, with the applied measures being continuously analyzed in the risk analysis.

CONCLUSIONS

GFSI is committed to review periodically the situation and to provide updates on the options available in these unpredictable times, specifically for the organisations whose certification is lapsing. As a direct result, each of them has comprehensive guidelines conducted.

REFERENCES

- [1] BRCS, 2000: Managing Food Safety during Covid-19.
- [2] Li Q, Guan X, Wu P, et al., 2020: Early transmission dynamics in Wuhan, China, of novel coronavirus-infected pneumonia, *The New England Journal of Medicine*, p. 1-9, doi:10.1056/NEJMoa2001316.
- [3] FSSC22000, 2000: CB requirements in relation to managing the novel Coronavirus (Covid-19) pandemic.
- [4] GFSI, 2020: GFSI Coronavirus Positions from 30.03.2020 and 16.10.2020.
- [5] GFSI 2020: online at: https://mygfsi.com/news_updates/update-on-temporary-audit-measures-during-covid-19-pandemic.
- [6] IFS, 2020: The IFS approach and measures regarding COVID-19.
- [7] IFS, 2020: IFS Guidance on crisis management concerning the COVID-19 crisis.

[8] WHO, 2020: Critical preparedness, readiness and response actions for COVID-19: Interim guidance, online at:

<https://www.who.int/publications-detail/critical-preparedness-readiness-and-response-actions-for-covid-19>

[9] WHO, 2020: Infection prevention and control SAVE LIVES: Clean Your Hands, online at:

<https://www.who.int/infection-prevention/campaigns/clean-hands/en/>

[10] WHO, 2020: Global Surveillance for human infection with coronavirus disease (COVID-19), online at: [https://www.who.int/publications-detail/global-surveillance-for-human-infection-with-novel-coronavirus-\(2019-ncov\)](https://www.who.int/publications-detail/global-surveillance-for-human-infection-with-novel-coronavirus-(2019-ncov))

[11] WHO, 2020: Considerations in the investigation of cases and clusters of COVID-19, online at: <https://www.who.int/publications-detail/considerations-in-the-investigation-of-cases-and-clusters-of-covid-19>

[12] WHO, 2020: Home care for patients with COVID-19 presenting with mild symptoms and management of their contacts, online at: [https://www.who.int/publications-detail/home-care-for-patients-with-suspected-novel-coronavirus-\(ncov\)-infection-presenting-with-mild-symptoms-and-management-of-contacts](https://www.who.int/publications-detail/home-care-for-patients-with-suspected-novel-coronavirus-(ncov)-infection-presenting-with-mild-symptoms-and-management-of-contacts).