Differences with GSFI recognized schemes and next level in food safety

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Why do organizations pursue SimplyOK

- "**We** (the food manufacturer) want to emphasize our allergen control"
  - **Commercial advantage**
  - **Risk based thinking (social responsibility, claims, etc.)**

- "**Our customer** wants us to have a certified allergen management system"
  - **After an allergen incident**
  - **Products with a claim**

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The scope of the audit

- It is about the **allergen management system**

How about:

Including not all products in the scope?

Free-from claims?

Exclusions?

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The scope of the audit

From the auditor point of view:
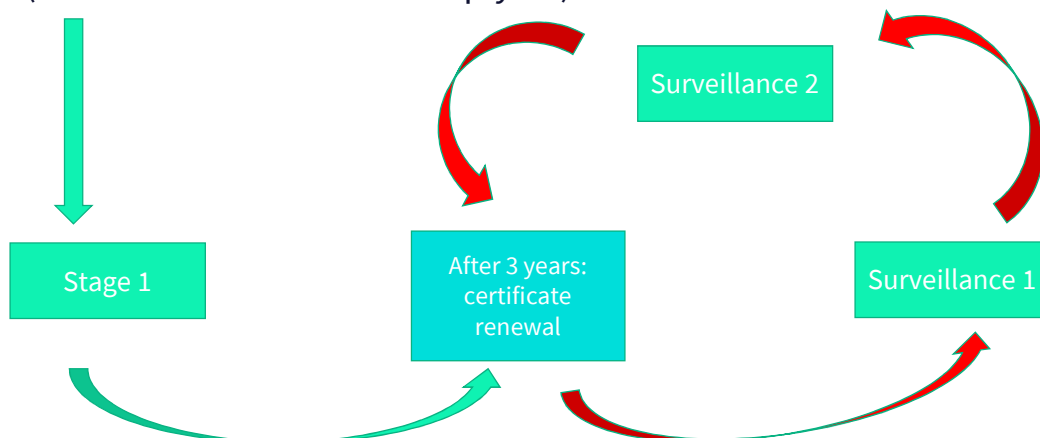
Every organization is different!

- Complexity: Number of raw material specifications, recipes and finished products

- Production lines and planning

- Differences in maturity of the organization

- Allergens present

ONE SIZE
FITS ALL

The SimplyOK audit process

- It starts with the selection of a certification body
(limited: check website SimplyOK)

Surveillance 2

Stage 1

After 3 years:
certificate
renewal

Surveillance 1

Stage 1 - SimplyOK certification

Is the organization ready for a SimplyOK certification audit?

- Management responsibility
  - **Attitude towards possible consequences?**
    - Supplier management
    - Labeling, PAL (precautionary allergen labeling)
  - **Will they support the allergen management system?**
    - Policy
    - Investments
    - Objectives
    - Allergen safety culture

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Stage 1 - SimplyOK certification

Data & systems check

Site tour

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Stage 2 - SimplyOK certification

Certification audit

- Implementation of 5 basics
- 5 calculations to challenge the correct use of data, correct labeling
- No non-conformities "open" before recommendation for certification

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What are the challenges for organizations?

- Supplier data

- Calculation

- Validation

- Verification

- And more……………

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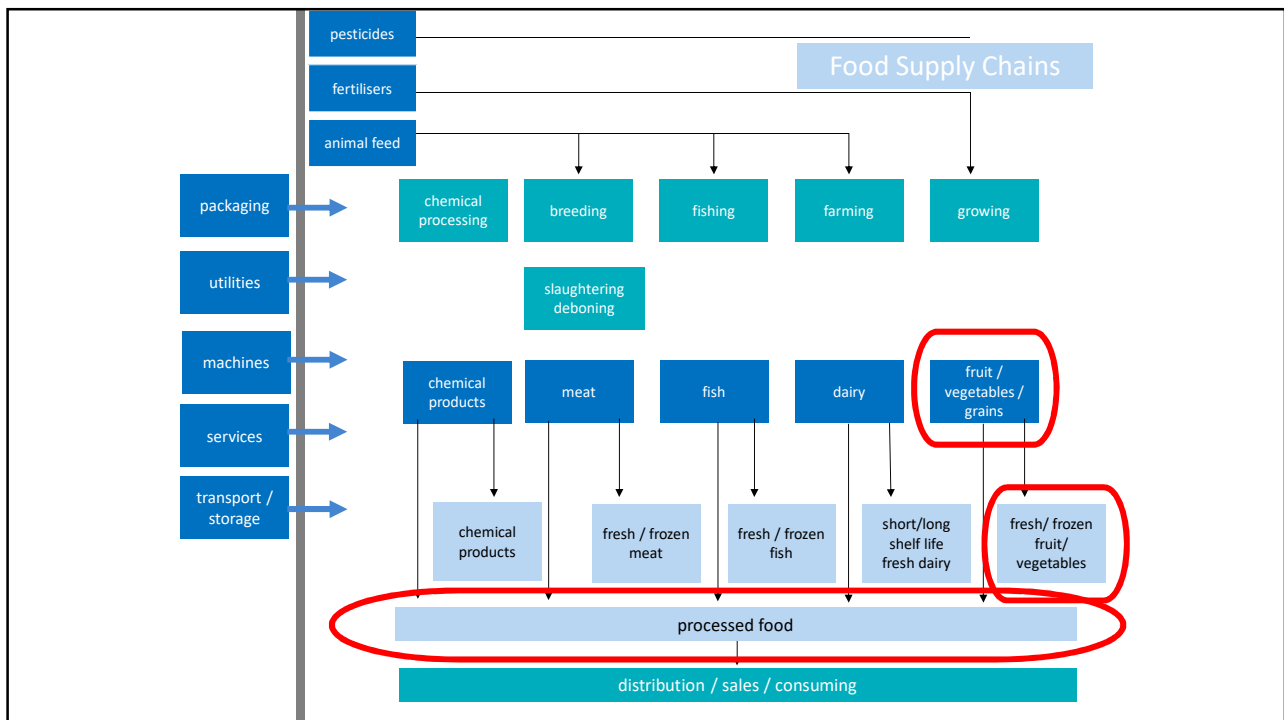
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What are the challenges for organizations?

Information in the food
supply chain

The need for **quantitative**
information about
allergens

Presence or absence of allergens	From Recipe*	From internal cross-contamination	
Eggs/products of these	-	-	
Peanuts/products of these	-	-	
Fish/products of these	-	-	
Gluten/products of these	-	-	
Crustaceans/products of these	-	-	
Lupine/products of these	-	-	
Milk (incl. lactose)/products of these	+	n. a.	

Food Supply Chains

- pesticides
- fertilisers
- animal feed

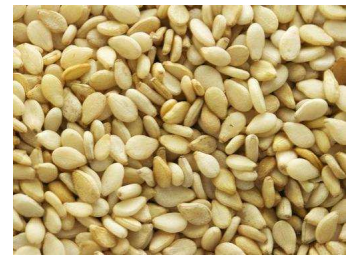| packaging | → | chemical processing | breeding | fishing | farming | growing |
utilities	→		slaughtering deboning			
machines	→	chemical products	meat	fish	dairy	fruit / vegetables / grains
services	→					
transport / storage	→	chemical products	fresh / frozen meat	fresh / frozen fish	short/long shelf life fresh dairy	fresh/ frozen fruit/ vegetables

processed food

distribution / sales / consuming

What are the challenges for organizations?

Calculations……..

- How to use VITAL limits?
- Consumption size
- How to determine product residue at each proces step?
- How to use this product residue information in the calculation?
- How to use the calculation tool?
- Total allergen → allergen protein
- Particle contamination
- "Calculations have to be validated" (Annex 1 - SimplyOK)

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What are the challenges for organizations?

Validation and verification

- What to validate and verificate? And how?

- How do you validate your cleaning processes?

- What is a suitable verification plan?

- How are verification and validation connected to HACCP analysis?

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Allergen management in GFSI

BRCGS Food, IFS Food, FSSC 22000, SQF, etc.

Does allergen control on GFSI level give you sufficient confidence that incidents en recalls will be prevented?

SimplyOK vs. GFSI certification: differences

Main differences

- The scope is all about allergens
  - Compare BRCGS Food → quality, food safety (all hazards), food defense/fraud, etc.

- Effective time used to check allergen risks

SimplyOK vs. GFSI certification: differences

Main differences

- PAL requirements (precautionary allergen labeling)
  – Based on VITAL calculation

- More specific requirements, for example:
  – Supplier specifications checked at least annually
  – Allergen management system included in policy and objectives
  – Training and awareness for employees

SimplyOK vs. GFSI certification: differences

Main differences

Claims (lactose free, gluten free) → more specific requirements for testing methods, labeling and frequencies

Labeling "Lactose free" more specific than European legislation
a) No more than 100 mg/kg lactose
b) Product from milk: *"Not suitable for persons/infants with milk allergy"*
c) In combination with enzyme treated milk: *"Not suitable for persons/infants with galactosemia"*

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Is SimplyOK "next level" in allergen control?

"Ask certificated organizations"

Positive feedback from organizations that have certification:
- The SimplyOK approach can also be used to control other claims or hazards (for example "plant based" certification)
- SimplyOK is going much further than GFSI
- SimplyOK gives more confidence in allergen control

Experience we (LRQA) had during audits:
- Most GFSI certificated organizations have multiple Major NC's during their first SimplyOK audit
- SimplyOK accelerates allergen knowledge for organizations and the food chain

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Any questions?

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