SSCI Benchmarking Assessment Report

Contents

1. Application Information

1.1. Benchmark assessment team and date

Scheme Owner name(s)	Foundation FSSC
Scheme Owner name and address	Foundation FSSC PO Box 2047, 4200 BA Gorinchem, The Netherlands
Scheme Owner name, email, contact number	Foundation FSSC Elsabe Matthee, Technical Director +31 (0) 658 07 5116 ematthee@fssc.com
Date of previous application (if applicable)	N/A
Benchmark Leader name and contact details	Reuben Levy, Reuben@LevyCR.com
SSCI Technical Manager name	Luiza Reguse l.reguse@theconsumergoodsforum.com
Observers name	N/A
Interpreter's name (if applicable)	N/A
Date of this office assessment	Office Visit conducted September 20-21, 2023
Language (e.g., English or other)	English

1.2. Benchmark assessment scopes

	SSCI Scopes of Recognition	Scopes of Recognition Applied For
AI	Processing and Manufacturing	YES
BI	Primary Production	NO
CI	At-Sea Operations	NO

2. Executive Summary and Recommendations to the Steering Committee

2.1. Executive summary

Foundation FSSC, based in The Netherlands, was established in 2015 and is a global non-profit and independent Scheme Owner. FSSC 22000 is the Foundation's flagship food safety management systems scheme, which is benchmarked by the Global Food Safety Initiative (GFSI) and against which approximately 31,000 organizations are certified globally.

Having acknowledged a market need for a social management system, the Foundation developed and published the FSSC 24000 Scheme on Social Management System Certification[1] in October 2022. As its social and labor standards, FSSC 24000 uses the BSI/PAS 24000:2022[2] as a normative document that establishes social and labor specifications. Foundation FSSC served on the multistakeholder steering group involved in developing that Publicly Available Specification (PAS).

With the FSSC 24000, the Foundation aims to:

1. Provide recognition for organizations that have demonstrated compliance to the Scheme requirements by establishing and maintaining an accurate and reliable public register of certified organizations,
2. Promote the accurate application, recognition, and general acceptance of social management system requirements within the consumer goods industry,
3. Provide information on and support for the auditing and certification of social management systems within the scope of the Scheme, and
4. Create impact through setting public goals linked to the UN Sustainable Development Goals.

In February 2023, the Foundation submitted an application for Sustainable Supply Chain Initiative (SSCI) Processing and Manufacturing scope recognition. Because of the recent timing of FSSC 24000's launch, there were no official FSSC 24000 audit reports to review. However, after careful consideration and consultation, the SSCI Steering Committee and The Consumer Goods Forum (TCGF) staff permitted an exception to the SSCI eligibility criteria. Ultimately, the Benchmark Leader (BL) reviewed a sample of FSSC 22000 audit reports and complaints/appeals incidents to evaluate the Foundation's capacity to administer a scheme, and the BL reviewed audit reports, training materials, and a summary learnings report of the FSSC 24000 pilot, in order to evaluate the Foundation's technical capacity to evaluate SSCI-aligned social and labor standards. If the Scheme is recognized by SSCI, then official FSSC 24000 audit reports will be evaluated during the upcoming Monitoring of Continuous Alignment (MoCA) process.

In May 2023, FSSC submitted its Self-Assessment Questionnaire response, and after the BL conducted an initial review in June, the group held a call in July, together with the SSCI Senior

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[1] https://www.fssc.com/schemes/fssc-24000/documents/version-1-0/#guidance-documents
[2] https://pages.bsigroup.com/PAS_24000:2022

Manager, to discuss and clarify perceived misalignments. FSSC updated its Self-Assessment Questionnaire before a second Desktop Review call in August. Based on results, the BL recommended planning the in-person Office Visit, which was conducted in September. The Office Visit resulted in a corrective action plan (CAP), and in October 2023, FSSC submitted documentation demonstrating successful completion of all CAPs.

Two "Partly Aligned" criteria regarding Auditor Competence (Scheme Management B3.02 and B3.03) have remained throughout the entire Benchmarking process, and CGF staff and the BL have advised FSSC to stand by for further guidance. In each case, FSSC 24000 requires that auditors maintain APSCA certification; however, SSCI standards currently do not align with APSCA requirements. The SSCI Team has informed the Benchmark Leader and the Scheme Owner that the above-mentioned requirements are currently under review by the SSCI Steering Committee to ensure that they are upholding market reality. During the Monitoring of Continued Alignment ("MoCA") process, FSSC's adherence to these requirements will be reevaluated. It is also important to highlight that the requirements from FSSC are in line with the ongoing discussions within the Steering Committee. Considering the information provided, the BL has not requested FSSC to create a CAP for either of these "Partly Aligned" criteria.

Throughout the benchmarking process, FSSC staff has remained cooperative, transparent, receptive to feedback, and diligent in resolving questions or non-alignments. FSSC has also demonstrated strong practices beyond SSCI criteria, such as a robust complaints and appeals management process and online platform, a learning management system for CBs and ABs involved with FSSC 24000, processes to promote AB staff's understanding of FSSC 24000 content, and processes for reducing audit duplication while still conducting necessary due diligence when first evaluating new organizations that hold other social certifications.

Foundation FSSC provided necessary evidence and demonstrated its capacity for FSSC 24000 to attain SSCI recognition.

2.2. Result of the public consultation

Public consultation to be held in November 2023.

2.3. Recommendation to the SSCI Steering Committee

Based on FSSC's transparency, cooperation, receptiveness, diligence, and commitment in aligning with SSCI criteria, the BL consider that FSSC had established the necessary programmatic foundations for alignment with SSCI and that, once official FSSC 24000 audits are conducted as anticipated, a future MoCA process could further demonstrate SSCI-aligned implementation.

At the time of writing this report, only two criteria concerning Auditor Competence remain "Partly Aligned" as explained above (Executive Summary).

The BL recommends that the SSCI Steering Committee recognize FSSC 24000, with the understanding that (a) the Steering Committee will be issuing updated Auditor Competence

criteria and (b) the BL will evaluate official FSSC 24000 audit reports during the upcoming MoCA process.

3. Results of Assessment and Office Visit

3.1. Time and location details

	Location	People present (e.g., SSCI, consultant, Scheme Owner. Names and roles)	Date and time
Self-assessment desktop review	Three reviews by BL, following receipt of initial materials	**FSSC Team:** Elsabe Matthee (Technical Director), Ante Batinic (Technical Manager, Social Sustainability) **SSCI Team:** Luiza Reguse **BL:** Reuben Levy	Between May and September 2023
Feedback calls	Conducted via Zoom	**FSSC Team:** Elsabe Matthee, Ante Batinic **SSCI Team:** Luiza Reguse **BL:** Reuben Levy	July 5 and August 17, 2023
Office visit	FSSC Headquarters	**FSSC Team:** Aldin Hilbrands (CEO), Cornelie Glerum (COO), Guido Dinjens (CMO), Elsabe Matthee, Ante Batinic **SSCI Team:** Luiza Reguse **BL:** Reuben Levy	September 20-21, 2023

3.2. Overview

- On February 7, 2023, Foundation FSSC submitted its application for FSSC 24000 to attain SSCI recognition.
- On May 17, FSSC initially submitted its Self-Assessment Questionnaire (SAQ).
- On June 16, the BL's completed the initial Desktop Review, which he sent to FSSC. In it, the BL identified 22 perceived Partly Aligned and three perceived Non-Aligned Scheme Management criteria and two Partly Aligned Social criteria.
- On July 5, the BL, SSCI Senior Manager, and FSSC representatives conducted the first Desktop Review call. The call offered a productive opportunity for FSSC to provide clarity about certain responses and for the BL to answer questions regarding the types of evidence that would demonstrate alignment in an updated SAQ. Specifically, the call addressed scheme management and social standards criteria, including:
  - Scheme Management A1.01, A1.02, A1.03, A1.04, A1.05 (Scheme Governance), A3.02 (Integrity Programme), A4.01, A4.02 (Logo Use and Claims), A5.04, A5.05, A5.07 (Standard Setting and Maintenance), B1.07, B1.09 (Accreditation), B2.03, B2.04 (Relationship with Audit Firms), B3.08, B3.09 (Auditor Competence), B4.05,

B4.09 (Audit Protocol), B6.02 (Follow-up Action) – Insufficient evidence had been provided;

- o Scheme Management A5.02 (Standard Setting and Maintenance), B4.13 (Audit Protocol) – FSSC acknowledged the lack of available evidence and committed to conduct immediate remediation;
- o Social Standards 7.03 (OHS) and 8.02 (Building Safety and Emergency Preparedness) – Evidence presented was insufficient;
- o Two "Partly Aligned" criteria regarding Auditor Competence (Scheme Management B3.02 and B3.03), for which the BL and SSCI Senior Manager advised FSSC staff to stand by for further guidance. In each case, FSSC 24000 requires that auditors maintain APSCA certification; however, SSCI framework currently requires higher level of competence from auditors. This requirement is under review by the SSCI Team and Steering Committee.
- o And other criteria initially deemed "Partly Aligned," but through clarifying discussion, revised to "Fully Aligned."

▸ Prior to the next Desktop Review call, FSSC submitted an updated SAQ with supporting evidence on July 24, reviewed and returned by the BL on August 11. Once more, FSSC revised the SAQ and submitted supporting evidence on August 14.

▸ On August 17, the BL, SSCI Senior Manager, and FSSC representatives conducted a second Desktop Review call, after which FSSC, once again, submitted supporting evidence on August 28, which the BL reviewed and then returned the fully reviewed SAQ on September 7. During the August 17 call, the BL discussed that based on the extent of FSSC's alignment and commitments to continue providing additional evidence, the SSCI Team and BL determined that it was appropriate to begin planning the Office Visit.

▸ On August 28, the FSSC Team submitted evidence addressing the remaining "Partly Aligned" criteria (not including Auditor Competence B3.02 and B3.03, discussed above), which the BL reviewed and approved on September 7.

▸ On September 8, FSSC representatives and the BL held a virtual meeting to view FSSC's audit management platform, in order for the BL to identify documents to potentially request during the Office Visit.

▸ Prior to the Office Visit, on September 12, the BL sent the FSSC team a draft agenda for the Office Visit and a list of 20 potential audit reports, from which the BL would sample during the Office Visit.

▸ The BL conducted the Office Visit on September 20-21, at the FSSC headquarters. FSSC representatives were engaged, cooperative, transparent, and receptive throughout the Office Visit. The Office Visit was conducted in English. All sampled audit reports were written in English, and any non-English content was translated to English by FSSC staff or FSSC's relevant CBs.

▸ During the Office Visit, the BL reviewed the complaint and appeals tracker, three FSSC 22000 audit reports with associated audit firm and auditor documentation (comprising one announced initial audit, one unannounced surveillance audit, and one group recertification), one pilot FSSC 24000 audit report, a summary learnings report of the FSSC 24000 pilot program, and one FSSC 24000 CB Onboarding evaluation.

▸ The Office Visit found two Partly Aligned criteria, A5.01 and A.504 (Standard Setting and Maintenance), discussed in Section 4.2.

▸ On October 6, FSSC representatives provided evidence documenting closed CAPS and plans for how changes will be continually implemented in the future.
▸ The BL and SSCI Senior Manager agreed with FSSC's corrective actions and evidence and determined to assess implementation during the future MoCA process.

4. General Compliance, Strengths, and Weaknesses

4.1.   Summary

‣ Foundation FSSC proved to have established the foundation for both a comprehensive Social Standard and Scheme Management system in its FSSC 24000 scheme. Where gaps existed with SSCI criteria, FSSC representatives were quick to acknowledge these differences and conduct immediate remediation to bring FSSC 24000 into alignment with SSCI.

‣ FSSC representatives' responsiveness, receptiveness, cooperation, and transparency throughout the benchmarking process demonstrated a willingness to attain and maintain alignment with SSCI.

‣ Although FSSC 24000 had not been used in official audits by the time of the Office Visit – flagged and discussed with the Steering Committee members before the acceptance of the application – Foundation FSSC demonstrated robust management systems based on its history of implementing FSSC 22000, technical understanding of social and labor standards through new staff hires and involvement with the BSI/PAS process, and program development based on SSCI requirements. The Foundation clearly created FSSC 24000 by striving to align with SSCI at the outset.

‣ Among the most noteworthy practices beyond SSCI requirements, FSSC 24000 includes:

   o *A robust complaints and appeals management process and platform* – Currently used for FSSC 22000 and prepared for implementation for FSSC 24000, the online platform enables FSSC staff to capture, track, follow-up, and close alerts and high-risk issues in an organized, efficient manner. The BL reviewed, in detail, three separate incidents that FSSC had been tracking. In one case, the Foundation had already detected and resolved improper use of the FSSC 24000 logo.

   o *A comprehensive learning management system (LMS) for training CB and AB staff* – The Foundation created a training platform with numerous modules explaining FSSC 24000 to CB and AB audiences. Already clear and informative, the Foundation is upgrading the initial version of the training platform to a formal LMS which will enable greater functionality, participant testing, and user tracking. Although the Foundation acknowledges that it maintains little leverage in placing requirements on AB partners, it does communicate expectations that relevant AB staff participate in the online training platform and has noted such cooperation.

   o *Transition audits* – Where a candidate organization holds an exiting accredited, third-party certification under separate social standard or SSCI-recognized certification program, FSSC 24000 permits a transition process in which the candidate organization undergoes an initial certification process that is two-thirds the normal duration (with a minimum of one auditor-day) and reduced preparatory/pre-audit visit requirements.

   o *Pilot program* – During the Office Visit, it was clear that the Foundation had conducted a thorough pilot program to test FSSC 24000 and gather feedback, prior to launching the scheme. The Technical Director presented materials shared with the CBs, explained how CB training was conducted, displayed documentation of audits conducted by multiple CBs across 10 countries in various global regions, and showed all CB feedback and how that feedback was handled.

‣ Although FSSC 24000 exhibited some areas for improvement, Foundation staff clearly understood any identified gaps and immediately conducted remediation as well as plans for ongoing implementation. Therefore, the BL did not deem any such misalignments as "weaknesses."

4.2.   Changes made to the Scheme following the benchmarking assessment

Based on the SSCI Benchmarking Process and the BL's findings, FSSC enhanced procedures and updated and clarified policies to align with SSCI criteria. Changes to Scheme Management and Social Standards include, in approximate chronological order:

‣ **Scheme Management – Standard Setting and Maintenance A5.02,** "The Scheme Owner shall have publicly available procedures for the process under which each standard is developed, approved and revised."
   o At the time of application, the FSSC 24000 website did not offer a comprehensive description of how the Standard is developed, revised, and approved. The SSCI criterion requires that the procedures for developing, revising, and approving the Standard are publicly available.
   o Following the initial Desktop Review, the Foundation staff updated the FSSC 24000 website to provide a clearer description of the process, to a public audience, and in line with SSCI standards.
‣ **Scheme Management – Audit Protocol B4.13,** "The Scheme Owner shall require audit firms to have policies and procedures in place to ensure the safety, protection and security of their auditors."
   o At the time of application, FSSC 24000 documentation did not specify relevant expectations for CBs beyond a high-level code of ethics.
   o Following the initial Desktop Review, the Foundation staff created a guidance article on its MyFSSC platform, immediately communicated to all CBs and other users, clearly articulating expectations for how CBs must establish necessary policies and procedures to ensure safety, protection, and security of their auditors.
‣ **Scheme Management – Standard Setting and Maintenance A5.01,** "The Scheme Owner shall have a document control procedure in place to ensure that all of the scheme's normative documents are appropriately controlled and publicly available."
   o During the Office Visit, the Foundation staff presented an organized "Document Masterlist," displaying all normative documents' titles, creator and approvers, and dates of approvals. Although it was clear some process was in place, the sheet exhibited various inconsistencies and some confusing entries.
   o Following the Office Visit, the Foundation staff revised the Document Masterlist, communicated to all departments about a new process for maintenance, and established a plan to monitor implementation.
‣ **Scheme Management – Standard Setting and Maintenance A5.04,** "The Scheme Owner shall ensure that the standard, during its development or for major revisions, (a) has been subject to public stakeholder consultation and (b) due consideration has been given to comments received from stakeholders during the consultation."

- o During the Office Visit, the BL and SSCI Senior Manager found that, although the Scheme Document and Annexes had been reviewed by select experts and stakeholder who provided feedback and input prior to the October 2022 launch, that review was not a public consultation.
- o Nevertheless, the social standard on which FSSC 24000 relies (BSI/PAS) had gone through a 60-day public consultation, although FSSC was engaged in but did not manage that process.
- o The BL and SSCI Senior Manager acknowledged that it would not be effective, efficient, or feasible for FSSC to recreate such a public consultation one year after the October 2022 launch. However, they requested FSSC to create a plan that acknowledges the initial misalignment with SSCI framework and establishes improved processes for the future.
- o Following the Office Visit, the Foundation staff documented their rationale for the initial advisory consultation and established a sufficient plan for future updates to the scheme.

4.3.   List of findings – Desktop Review and Office Visit

Following the Office Visit, two non-conformities remain "Partly Aligned," requiring SSCI Steering Committee consideration.

SSCI Benchmarking Requirements Part	Criterion Number, Chapter	Non-conformity	Partly / no	Action from Scheme Owner	Recommendation from Benchmark Leader	Decision from SSCI Manager
Part III – Social Standard	B3.02, Auditor Competence: The lead auditor performing audits for the audit firm shall have the following experience: - a minimum of 1-year experience in social compliance auditing and a minimum of 100 social compliance audit days or - a minimum of 2 years experience in any other type of auditing and 150 audit days of which a minimum of 50 are social compliance audit days. Other audit days may include management system, health and safety, labour inspections, investigations, audit components or - a detailed combination of minimum relevant experience of 3 years in social compliance training, and social compliance audit days, a minimum of which 50 are social compliance audit days, that are publicly available and consistent with standard industry practices and norms.	FSSC 24000 requires APSCA qualification, specifically, "a) Lead auditors shall as a minimum be a Certified Social Compliance Auditor (CSCA) or Registered Auditor (RA) – the RA level is only applicable up to 1 June 2023. b) An APSCA Associate Auditor (ASCA) can be an FSSC 24000 auditor (team member) in the audit team but are required to meet the pathway 4 requirements on work experience and social audit days, namely a minimum of 90 days social compliance industry experience and a minimum of 20 social compliance audit days. The lead auditor shall always be a CSCA or RA – refer to (a) above." However, current APSCA competency standards are not aligned with this SSCI criterion.	Partly	[BL and SSCI Senior Manager advised the Scheme Owner to stand by for further guidance and the approval of the new version of the SSCI requirement for Auditor Competence.]	Standing by for SSCI Steering Committee Guidance	The SSCI is currently reviewing this requirement. Therefore, the compliance will be checked again during Monitoring of Continued Alignment.

SSCI Benchmarking Requirements Part	Criterion Number, Chapter	Non-conformity	Partly / no	Action from Scheme Owner	Recommendation from Benchmark Leader	Decision from SSCI Manager
Part III – Social Standard	B3.03, Auditor Competence: In the event that an audit firm is not yet meeting the requirements of B3.02, the Scheme Owner may put procedures in place for a clearly defined transition period to allow audit firms to meet these requirements.	The Scheme Owner explains, "The initial qualification requirements are based on ASPCA Auditor Competency Framework and are thus an inherent part of the standard requirements. Therefore, there are no defined exceptions in this standard revision. However, exceptions may be considered on a case-by-case basis to maintain auditor qualification." However, current APSCA competency standards are not aligned with this SSCI criterion.	Partly	[BL and SSCI Senior Manager advised the Scheme Owner to stand by for further guidance and the approval of the new version of the SSCI requirement for Auditor Competence.]	Standing by for SSCI Steering Committee Guidance	The SSCI is currently reviewing this requirement. Therefore, the compliance will be checked again during Monitoring of Continued Alignment.

5. Results of the Public Stakeholder Consultation

5.1.   Summary

TBC

5.2. List of findings – Public Stakeholder Consultation

Criterion Number, Chapter	List of issues raised	Answer from Scheme Owner	Recommendation from Benchmark leader	Decision from SSCI Manager