

Comparison with JFS-C Standard Document (ver. 2.3 and ver. 3.0) and overview of revisions

BR2020.1: GFSI Benchmark Requirements ver. 2020.1

JFS-C v2.3: JFS-C Standard Document ver.2.3

JFS-C v3.0: JFS-C Standard Document ver.3.0

Green Fill: NEW ELEMENTS in BR2020.1

Yellow Fill: STRENGTHENED ELEMENTS in BR2020.1

JFS-C v. 2.3

JFS-C v. 3.0

Number	Clause Name	Requirements	Number	Clause Name	Requirements	Summary of Revisions
FSM 5	Top Management Commitment	Top management shall provide evidence of their commitment to establish, implement, maintain and improve the food safety management system.	FSM 2	Top Management Commitment and Food Safety Culture	Top management shall show evidence of its commitment to building, implementing, maintaining and continually improving its food safety management systems. This commitment shall include elements of a food safety culture, and this means, at a minimum, communicating with employees, responding to Kaizen suggestions, training to improve food safety, and assessing the performance of food safety activities. In addition, these efforts shall be incorporated and implemented in the food safety management systems of the entire organization.	<ul style="list-style-type: none"> •This Standard requires that an element of food safety culture be included in the top management commitment. •This standard also requires top management to respond to Kaizen suggestions to improve food safety as required in FSM 26, as an element of this commitment.
FSM 19	Utilization of Suggestions for Improvement from Workers	The organization shall establish and implement a system to properly utilize suggestions from workers to improve food safety.				
FSM 8	Document and Record Control	The organization shall prepare documents and keep records to demonstrate that the organization's operations and activities comply with the requirements of this Standard. The organization shall have a written procedure to control and securely maintain the documents and records and make the documents and records readily accessible when needed. In order to ensure effective operations and control of food safety processes and management, the retention period of the documents and records shall be set complying with, if any, the regulatory and customer requirements.	FSM 9.2	Control and storage of documented information	The organization shall provide the documented information required to demonstrate its effective operation of the food safety management system and control of processes. Documented information shall be stored for the period required by the customer or legal and regulatory requirements, or if there are no applicable requirements, for a period exceeding the shelf life of the food. In addition, the documented information shall be effectively controlled so that it is always available when it is required.	<ul style="list-style-type: none"> •The requirements of FSM 8 in JFS-C v2.3 have been split and aligned with the numbering structure of BR2020. •In the absence of a customer or legal requirement for the retention period of a document, this standard requires organizations to retain the document for a period of time that exceeds the shelf life of the food item.
FSM 24	Traceability	The organization shall establish, implement and maintain appropriate procedures and systems to ensure: <ol style="list-style-type: none"> identification of any outsourced raw materials and ingredients (including packaging materials), products, services and outsourced processes; product identification that includes, as a minimum, the name and location of the producer; identification of batches, partially processed products, work in progress, products being reprocessed, reworks, finished products, and packaging materials throughout the production process; records of purchaser and delivery destination for all products supplied. The procedures and systems shall be verified at least once a year, and the results shall be recorded.	FSM 14	Traceability	The organization shall establish, implement and maintain appropriate tracing procedures covering all processes from supplier (at least one step before) to recipient (at least one step after) to ensure product identification. Documented procedures shall be verified at least one a year by trace testing to ensure that they are working effectively, and the verification results shall also be recorded.	<ul style="list-style-type: none"> •The standard requires that organizations perform at least annual trace testing based on a documented traceability procedure and verification that the procedure is working effectively.

JFS-C v. 2.3

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			FSM 15	Product development	The organization shall establish, implement and maintain product design and development procedures to ensure that new products or products whose specifications and manufacturing processes have changed are manufactured safely and in accordance with legal and regulatory requirements. These development procedures shall clearly confirm that the products and services provided conform to specifications, and after identifying all the hazards of food safety, shall include a review to evaluate and approve the adequacy of food safety assurance in the design and development.	•This standard requires organizations to establish product design and development procedures and to include reviews to ensure food safety in those procedures.
FSM 23	Product Labeling	The organization shall ensure that all product bears or is accompanied by information to enable the safe handling, display, storage, preparation and use of the product including allergens in the food supply chain or by consumer. The finished product shall be labelled according to the applicable food regulations in the intended country of sale. Procedures to ensure the correct information on the product shall be established and implemented.	FSM 18.2	Product labeling (B-to-B products, work in progress, semi-finished products)	The organization shall define and implement procedures to provide information, such as on primary processed foods, commercial ingredients, or intermediates in the processing process, so that customers or consumers can be informed about product safety, even if the information is not labeled on or attached to the product.	•This standard requires organizations to establish and implement procedures to provide information about the safety of their products to customers or consumers, even if the information is not labeled or attached to the product.
FSM 25	Analysis of Input Materials	The organization shall establish and implement a system to ensure analysis of input raw materials and ingredients (including water) that have an effect on food safety. The inspection shall be conducted by a competent laboratory.	FSM 19.1	Analysis and Inspection	The organization shall establish, implement, and maintain procedures to ensure the analysis of raw materials, semi-finished products, finished products, manufacturing environments, etc. that affect food safety. The inspection shall be conducted by a competent inspection department or analysis institution using appropriate sampling and analytical methods. Inspections that have a significant effect on food safety shall be conducted in accordance with ISO/IEC 17025.	•This standard requires that inspections conducted by organizations that have a significant impact on food safety be conducted in accordance with ISO/IEC 17025.

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GMP 3	Design, Construction and Layout of Facilities, Equipment and Production	Site, building, and facility and equipment in the plant shall be designed, laid out, constructed and maintained to enable controlling the risk of product contamination caused by external and internal environment and manufacturing flow.	GMP 3	Design, construction, layout of business site and work and product flow lines	The organization shall design, construct and maintain the factory buildings and facilities (storage area, raw material and product handling area, preparation area, packaging and storage area, etc.) of the business site both outside and inside the plant to minimize food safety risks. In addition, the equipment layout and the flow lines of people, goods, and work shall be designed to meet the intended purpose and minimize food safety risks.	•This standard requires organizations to design, construct, and maintain their workplace facilities, both off-site and on-site, in a manner that minimizes food safety risks, and to analyze the facility layout and flow of people, goods, and operations to ensure that they minimize food safety risks.
GMP 8	Physical, Chemical and Biological Product Contamination Risks	Appropriate facilities and procedures shall be established to control the risks of physical, chemical (including allergens) and biological contamination of product.	GMP 4	Physical, chemical and biological product contamination risks and isolation	The organization shall clarify that all hazard factors (physical, chemical (including allergens), and biological) for each process have been identified based on consistency checks between the process flow created by the HACCP team and the site. The frequency of occurrence and the magnitude of the consequences of the identified hazards shall be evaluated and appropriate control measures shall be set for each. Procedures shall be established and documented to control identified hazards other than critical control points (CCPs) that are difficult to manage effectively with a general hygiene control program to prevent contamination of raw materials (including packaging materials), semi-finished products, work-in-process, rework and finished products, and crosscontamination. The organization shall regularly review these procedures and keep them in effect.	•This standard requires organizations to establish appropriate control measures for all hazards from the perspective of the manufacturing environment, although they may not be applicable to the HACCP Critical Control Points (CCPs), and to ensure that these hazards and raw materials and products are not cross-contaminated. •Although this clause is an enhanced element in BR2020.1, it is included in JFS-C v2.3 and the requirements remain unchanged.
GMP 9	Segregation and Cross-contamination	Procedures to prevent contamination and cross-contamination shall be established for raw materials and ingredients (including packaging materials), partially processed products, work in progress, products being reprocessed, reworks, and finished products, covering all aspects of food safety including micro-organisms, chemicals and allergens.				
GMP 17	Training	A system shall be in place to ensure all workers are adequately trained on food safety principles (including HACCP) and practices, commensurate with the worker’s activity. A system shall be established to ensure all workers are adequately instructed and supervised. Training shall ensure all workers to be aware of the roles in food safety and the significance of the activities.	GMP 7	Training	All personnel shall be trained in their appropriate language on food safety (including management, culture, HACCP, GMP), and there shall be a system for each personnel to deepen their understanding, implement, and maintain food safety in their respective work. In addition, there shall be a system to improve comprehension by repeating the training as necessary after evaluating competence.	•This standard requires organizations to establish a system to educate and train all employees on food safety, and to evaluate their competence and repeat the training as necessary to enhance their understanding.
GMP 11	Housekeeping, Cleaning and Hygiene	Housekeeping and cleaning shall be carried out following the documented criteria throughout all the process steps and stages, and an appropriate hygiene level shall be maintained at all times by disinfecting where necessary. Cleaning tools, cleaning agents and disinfectants shall be suitable for their intended use and stored appropriately.	GMP 8	Housekeeping, cleaning, sterilization and disinfection	The organization shall identify product-specific risks based on a hazard analysis and establish, implement and maintain documented organization, cleaning, sterilization and disinfection procedures. In addition, the organization shall also verify that procedures that can minimize product-specific risks are working effectively. Cleaning tools, cleaning agents and disinfectants shall be suitable for their intended use and stored appropriately. Food safety information on potentially harmful chemicals shall be obtained and confirmed.	•This standard requires organizations to document and verify the effectiveness of their tidiness, disinfection and disinfection procedures, in accordance with the risks involved.

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			GMP 10	Patrol and inspection of the site	The organization shall establish a patrol plan and regularly inspect the environment, facilities, and process design (people, things, work flow lines) of the entire site. Records shall be maintained as evidence of the inspection. The patrol plan shall ensure that the workplace is maintained in an appropriate state according to its activities and that food safety is ensured.	•This standard requires organizations to establish and regularly implement a patrol plan for environment, equipment, and flow of people, goods and works in the site.
GMP 12	Water and Ice Management	Required quality criteria shall be defined for waters (including steam and ice; the same applies hereinafter) used in food manufacturing, depending upon the intended use, and the quality of water shall be regularly monitored and recorded.	GMP 11	Air and water management	The organization shall define the required quality criteria according to the application, and regularly monitor and record the air, high-pressure gas, and water (including ice and steam) used in food production in order to minimize the effect on food safety. If any water that is not used for food production (including wastewater) and is not suitable for food production is used, it must be managed to prevent contamination of the water used for food production.	•This clause requires the organization to regularly monitor air, high-pressure gas, and water used in food production, and to control it to ensure that water unsuitable for food production does not contaminate water for production.
GMP 14	Pest Control	A system shall be established to control or eliminate the food safety risks caused by pests in the site or in the facilities. In case where chemicals are used, a handling procedure shall be established not to affect food.	GMP 13	Pest control	The organization shall establish, implement and maintain procedures to control or eliminate food safety risks caused by pests (pests and vermin) on the premises and in the facilities. These procedures shall be implemented using the following cycle. 1. Understanding of the pest outbreak situation and formulation of monitoring plans. 2. Implementation of pest control and invasion prevention. 3. Pest monitoring and dissemination of results to personnel. The organization shall establish pest control procedures as necessary.	•This standard requires organizations to establish procedures to prevent, control and remove the risk of pest outbreaks at their sites.
GMP 6	Maintenance	A system shall be established to control or eliminate the food safety risks caused by pests in the site or in the facilities. In case where chemicals are used, a handling procedure shall be established not to affect food.	GMP 19	Maintenance	A system of planned maintenance covering all items of equipment which are critical to product safety shall be established.	•This standard requires organizations to establish a maintenance system for all plant facilities and equipment that are critical to the safety of their products. •This clause is an enhanced element in BR2020.1, but is included in JFS-C v2.3 and the requirements remain unchanged.