Summary of contrast and revision of JFS-C Standard Documents (Ver. 3.1/Ver. 3.2 Draft)

JFS-C V3.1: JFS-C Standard Document Ver. 3.1

JFS-C V3.2 Draft: JFS-C Standard Document ver. 3.2 Draft

Red text: Main additions, corrections, etc.

JFS-C V3.1
Introduction

JFS-C V3.2 Draft
Introduction

Number	Item	Explanatory text etc.	Number	Item	Explanatory text etc.	Summary of Major Revisions
1.3	Structure of this Standard Document	This Standard Document is consistent with the benchmark requirement version 2020.1 (*3 hereafter, BR 2020.1) published by GFSI in June 2020. On the other hand, since BR 2020.1 adopts ISO22000:2018 (*4) in its scope structure and numbering structure, this Standard Document has a structure consistent with both the scope structure and numbering structure.	1.3	Structure of this Standard Document	This Standard Document is consistent with the benchmark requirement version 2024 (*3 hereafter, BR 2024) published by GFSI in December 2024. On the other hand, since BR 2024 adopts ISO22000:2018 (*4) in its scope structure and numbering structure, this Standard Document has a structure consistent with both the scope structure and numbering structure.	·Alignment with "The GFSI Benchmarking Requirements version 2024"
		(*3) GFSI "The GFSI Benchmarking Requirements version 2020.1"			(*3) GFSI "The GFSI Benchmarking Requirements version 2024"	·Alignment with "The GFSI Benchmarking Requirements version 2024"
		Figure 1 Conceptual diagram of two PDCA cycles in the JFS-C Standard Document Food Safety Management System			Figure 1 Conceptual diagram of two PDCA cycles in the JFS-C Standard Document Food Safety Management System	·Added item number to align with "The GFSI Benchmarking Requirements version 2024"
1.4	Exclusion from Application of Requirements	Sector list by GFSI Reference: The GFSI Benchmarking Requirements version 2020 PART I	1.4	Exclusion from Application of Requirements	Sector list by GFSI Reference: The GFSI Benchmarking Requirements version 2024 PART I	·Alignment with "The GFSI Benchmarking Requirements version 2024"

FSM

FSM

Number	Item	Requirement	Number	Item	Requirement	Summary of Major Revisions
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.	FSM 2	Top Management Commitment and Food Safety Culture	Top management shall demonstrate evidence of its commitment that establishing direction, engaging personnel and providing sufficient resources, to maintain a positive food safety culture and developing, implementing, maintaining and continually improving the food safety management system. With regard to a food safety culture, an assessment plan shall be established, implemented and maintained to identify areas of improvement to drive a positive behaviour, 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, etc. And top management shall ensure that all personnel demonstrate a clear commitment to the production and safe handling of food.	·Alignment with "The GFSI Benchmarking Requirements version 2024"
FSM 7	Food Defense	The organization shall document, implement, and record assessment procedures to identify potential and overt threats to hazards of intentional food contamination by persons within or outside the organization and prioritize response to those threats. The organization shall document and implement a food defense plan that specifies the actions that the organization implements to mitigate or exclude the identified food defense threat. This plan shall include GMP and shall be incorporated into the food safety management system. The organization shall also establish access controls for areas where food defense vulnerabilities have been identified. The organization shall establish and implement procedures for responding to possible intentional contamination of product.	FSM 7	Food Defense	The organization shall document, implement, and record assessment procedures to identify potential and overt threats to hazards of intentional food contamination by persons within or outside the organization and prioritize response to those threats. Appropriate knowledge and expertise shall be utilized to develop and maintain an effective plan for this assessment. The organization shall document, implement, verify and maintain a food defense plan that specifies the actions that the organization implements to mitigate or exclude the identified food defense threat. This plan shall also be checked at intervals determined by the organization, or when a new threat is established, and reviewed, if necessary, as a result. The organization shall also establish access controls for areas where food defense vulnerabilities have been identified. The organization shall establish and implement procedures for responding to possible intentional contamination of product.	·Alignment with "The GFSI Benchmarking Requirements version 2024"
FSM 8	Food Fraud Prevention	The organization shall document, implement, and record assessment procedures to identify potential and overt food fraud vulnerabilities such as tampering with records and labeling of products and intentional dilution, and prioritize food fraud mitigation measures. The organization shall develop a documented plan that specifies the measures the organization implements to mitigate the identified threats of food fraud. This plan shall cover the GMP and shall be incorporated into the food safety management system.	FSM 8	Food Fraud Prevention	The organization shall document, implement, and record assessment procedures to identify potential and overt food fraud vulnerabilities such as tampering with records and labeling of products and intentional dilution, and prioritize food fraud mitigation measures. Appropriate knowledge and expertise shall be utilized to develop and maintain an effective plan for this assessment. The organization shall document, implement, verify and maintain a plan that specifies the measures the organization implements to mitigate the identified threats of food fraud. This plan shall also be checked at intervals determined by the organization, or when a new threat is established, and reviewed, if necessary, as a result.	·Alignment with "The GFSI Benchmarking Requirements version 2024"

FSM 10	Specification Control of Purchased or Provided Items and Services	For all purchased or provided input items and services (including raw materials and ingredients (including containers and packaging materials), equipment and tools, utilities, and services (e.g. electricity, water, transportation, maintenance)) that have an effect on the safety of final product, the organization shall ensure that documented specifications are prepared, maintained, securely retained and readily accessible when needed. The organization shall evaluate the risks and set the confirmation items (confirmation of inspection certificate, condition, temperature, display, etc.) on the items to be purchased or provided. In addition, the organization shall define and implement a review process that includes the handling of changes in specifications and the frequency of regular reviews.	FSM 10	Specification Control of Purchased or Provided Items and Services	For all purchased or provided input items and services (including raw materials and ingredients (including containers and packaging materials), equipment and tools, utilities, and services (e.g. electricity, water, transportation, maintenance)) that have an effect on the safety of final product, the organization shall ensure that documented specifications are prepared, maintained, securely retained and readily accessible when needed. Microbiological, physical, chemical and allergenic specifications shall be based on appropriate scientific principles. The organization shall evaluate the risks and set the confirmation items (confirmation of inspection certificate, condition, temperature, display, etc.) on the items to be purchased or provided. In addition, the organization shall define and implement a review process that includes the handling of changes in specifications and the frequency of regular reviews.	·Alignment with "The GFSI Benchmarking Requirements version 2024"
			FSM 19.3	Cleaning and Disinfection Program	The organization shall establish, implement, and maintain a cleaning and disinfection program, and also shall be in place to verify the effectiveness of the cleaning and disinfection program.	·Alignment with "The GFSI Benchmarking Requirements version 2024"

HACCP

HACCP Step 1	HACCP team assembly and identification of the scope of application	HACCP team shall be assembled with competent staff, and the scope of application of the HACCP system and applicable GMPs shall be identified. The scope shall be documented what products and processes are covered by which HACCP plan.	HACCP Step 1	HACCP team assembly and identification of the scope of application	The organization shall assemble the HACCP team with competent staff to identify the scope of the HACCP system and the applicable GMPs. The scope shall be documented what products and processes are covered by which HACCP plan. Additionally, appropriate knowledge and expertise shall be used in developing an effective HACCP system.	·Alignment with "The GFSI Benchmarking Requirements version 2024" ·Clarifying the subject
HACCP Step 2	Product Description	Product specifications shall be documented. The document shall describe all product information necessary to conduct hazard analysis. Scope of the HACCP system shall be defined per product or product group and per process line or process location. This system should be systematic and comprehensive and take into account legal and regulatory requirements related to food safety.	HACCP Step 2	Product Description	The organization shall document product specifications. The document shall describe all product information necessary to conduct hazard analysis. Scope of the HACCP system shall be defined per product or product group and per process line or process location. This system should be systematic and comprehensive and take into account legal and regulatory requirements related to food safety.	·Clarifying the subject
HACCP Step 3	Identification of Intended Use	Intended use of the product and target users (consumers) shall be clearly described in a written document.	HACCP Step 3	Identification of Intended Use	The organization shall clearly describe intended use of the product and target users (consumers) in a written document.	·Clarifying the subject
HACCP Step 4	Construction of Flow Diagram	The flow diagram that covers all steps in the operation shall be constructed.	HACCP Step 4	Construction of Flow Diagram	The organization shall construct the flow diagram that covers all steps in the operation.	·Clarifying the subject
HACCP Step 5	On-site Confirmation of Flow Diagram	The flow diagram shall be verified whether it correctly reflects the existing process steps of the operation.	HACCP Step 5	On-site Confirmation of Flow Diagram	The organization shall verify the flow diagram whether correctly reflects the existing process steps of the operation.	·Clarifying the subject
HACCP Step 7 (Principle 2)	Critical Control Points	Critical Control Points (CCPs) shall be determined.	HACCP Step 7 (Principle 2)	Critical Control Points	The organization shall determine Critical Control Points (CCPs).	·Clarifying the subject
HACCP Step 8 (Principle 3)	Critical Limits	Validated critical limit(s) shall be stipulated for each CCP.	HACCP Step 8 (Principle 3)	Critical Limits	The organization shall stipulate Validated critical limit(s) for each CCP.	·Clarifying the subject
HACCP Step 9 (Principle 4)	Monitoring System	Monitoring procedures shall be established for each CCP.	HACCP Step 9 (Principle 4)	Monitoring System	The organization shall establish monitoring procedures for each CCP.	·Clarifying the subject
HACCP Step 10 (Principle 5)	Corrective Actions	A procedure of corrective actions (correction, and investigation and removal of root cause) shall be established for deviations from a critical limit.	HACCP Step 10 (Principle 5)	Corrective Actions	The organization shall establish a procedure of corrective actions (correction, investigation and elimination removal of root cause) for deviations from a critical limit.	·Clarifying the subject
HACCP Step 11 (Principle 6)	Establish HACCP plan validation and verification procedures	HACCP plan shall be validated prior to implementation. Verification procedures shall be established to confirm whether the defined handling (HACCP Plans) is carried out as specified and to judge whether it is necessary to modify the defined handling. Verification shall be carried out considering the design of equipment, change in processing method and technology development in the manufacturing process.	HACCP Step 11 (Principle 6)	Establish HACCP plan validation and verification procedures	The organization shall validate HACCP plan prior to implementation. Verification procedures shall be established to confirm whether the defined handling (HACCP Plans) is carried out as specified and to judge whether it is necessary to modify the defined handling. Verification shall be carried out considering the design of equipment, change in processing method and technology development in the manufacturing process. HACCP system shall be reviewed regularly and updated when there is a significant change that could introduce new hazards and/or control measures.	·Alignment with "The GFSI Benchmarking Requirements version 2024" ·Clarifying the subject
HACCP Step 12 (Principle 7)	Documents and Record	Necessary documents shall be prepared and maintained. These documents shall contain documents related to the standard operating procedures (SOP) and the work instructions (WI) necessary and applicable to the scope of certification of the organization.	HACCP Step 12 (Principle 7)	Documents and Record	The organization shall prepare and maintain necessary documents. These documents shall contain documents related to the standard operating procedures (SOP) and the work instructions (WI) necessary and applicable to the scope of certification of the organization.	·Clarifying the subject

GMP

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 (including drainage system and lighting) and the flow lines of people, goods, and work shall be designed to meet the intended purpose and minimize food safety risks. The organization shall set the lighting necessary for food safety to an appropriate level of illuminance. Additionally, the organization shall ensure that facilities and equipment that come into contact with food are constructed and made of materials that allow for appropriate maintenance, cleaning, and disinfection.	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 (including drainage system and lighting) and the flow lines of people, goods, and work shall be designed to meet the intended purpose, and minimize in line with hygienic design principles indicated in laws and regulations related to food safety to food safety risks. The organization shall set the lighting necessary for food safety to an appropriate level of illuminance. Additionally, the organization shall ensure that facilities and equipment that come into contact with food are constructed and made of materials that allow for appropriate maintenance, cleaning, and disinfection.	·Alignment with "The GFSI Benchmarking Requirements version 2024"
GMP 6.2	Personnel workwear	The organization shall evaluate product-specific risks and provide appropriate work clothing to minimize food safety risks.	GMP 6.2	Personnel workwear	The organization shall evaluate product-specific risks and provide appropriate work clothing and shoes to minimize food safety risks.	·Alignment with "The GFSI Benchmarking Requirements version 2024"

GMP 7	Training	The organization shall ensure that all personnel, including new personnel, be trained in their appropriate language on food safety (including management, culture, HACCP, GMP), and be a system for each personnel to deepen their understanding, implement, and maintain food safety in their respective work. The organization shall keep records of the implementation of education and training. Additionally, the system for retraining as necessary shall be documented and implemented. This education and training shall enable employees to recognize their role in food safety and the significance of their efforts. In addition, there shall be a system to improve comprehension by repeating the training as necessary after evaluating competence.	GMP 7	Training	The organization shall ensure that all personnel, including new personnel and temporary workers, be trained in their appropriate language on food safety (including management, culture, HACCP, GMP) and be a system for each personnel to deepen their understanding, implement, and maintain food safety in their respective work, commensurate with their activity. The organization shall keep records of the implementation of education and training. Additionally, the system for retraining as necessary shall be documented and implemented. This education and training shall enable employees to recognize their role in food safety and the significance of their efforts. In addition, there shall be a system to improve comprehension by repeating the training as necessary after evaluating competence. Scope of the above education and training shall include relevant subcontractors, and their management shall be carried out in accordance with FSM 13.3.	·Alignment with "The GFSI Benchmarking Requirements version 2024"
GMP 12	Waste Management	The organization shall establish adequate systems for segregation, collection and disposal of waste (including wastewater). The flow lines of waste shall be established so as not to cause cross-contamination of food. Locations and containers for placing waste shall be controlled to prevent attraction of pests or growth of harmful organisms/micro-organisms. Containers for storing waste materials (including by-products not suitable for food use) shall be clearly distinguished from other containers.	GMP 12	Waste Management	The organization shall establish, implement and maintain adequate systems for segregation, collection and disposal of waste (including wastewater) to ensure they do not pose any food safety risks. The flow lines of waste shall be established so as not to cause cross-contamination of food. Locations and containers for placing waste shall be controlled to prevent attraction of pests or growth of harmful organisms/micro-organisms. Containers for storing waste materials (including by-products not suitable for food use) shall be clearly distinguished from other containers.	·Alignment with "The GFSI Benchmarking Requirements version 2024"
GMP 15	Transport	The organization shall establish a system to ensure that containers and transportation vehicles, including contracted vehicles, used for the transportation of raw materials and ingredients (including packaging materials), partially processed products, works in progress, recycled products, reworks, and finished products (including packed fresh products in final packaging) are suitable for the intended use, maintained in good repair and clean, protected from contamination, and transported within its intended temperature range.	GMP 15	Transport	The organization shall ensure that all containers and transport vehicles used to transport raw materials (including packaging materials), semi-finished products, work-in-progress, recycled products, and finished products (including final packaged and packed perishable foods) that can affect food safety, are designed, constructed, monitored, and maintained to minimize risks. Their containers and transport vehicles, including contracted vehicles, are suitable for the intended use, maintained in good repair and clean, protected from contamination, and transported within its intended temperature range.	·Alignment with "The GFSI Benchmarking Requirements version 2024"