



THE CONSUMER GOODS FORUM

Sustainable Supply Chain Initiative

**Part I: SSCI Benchmarking Process
Comments Received from Stakeholders/Public
Consultation October 2025**



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Foreword

The Sustainable Supply Chain Initiative recently conducted stakeholder consultation involving representatives from diverse sectors, including scheme owners, international and industry experts, associations, NGOs, and academics. This consultation specifically focused on the SSCI Benchmarking Process, which outlines the method and process for benchmarking auditing, monitoring and certification programmes against the requirements defined in the SSCI Benchmark Requirements. In its last revision, Version 2.0, SSCI has developed a set of requirements tailored specifically for schemes that do not rely on accreditation. Under what the SSCI refers to as "Assurance Programmes," the new criteria set standards for issuing certificates without formal accreditation, ensuring they include essential information for transparency. These requirements are included in Part II: Scheme Management Criteria, applicable to all scopes.

This document serves as a compilation of all the valuable input received during the public consultation phase that took place between June and August 2025.

The feedback and comments received during this consultation were thoroughly reviewed and discussed within the SSCI Technical Committee and Steering Committee. Additionally, an external consultant was engaged to provide their expertise in this process.

The report includes feedback received for Part I: SSCI Benchmarking Process and Part II: Scheme Management - for the additional criteria proposed (included in v2.1). The comments received have been categorised and consolidated under their respective associated section and specific criterion (Part II), including the original text, the comment received, the SSCI response and the final text.

The SSCI team is thankful for all the comments received and the high-level discussion during the public consultation. Your valuable input and engagement are crucial in helping us refine and improve our framework.

For further details on the consultation process, please visit the dedicated page [SSCI Public Consultation](#). If you have any questions or require additional information, please do not hesitate to reach out to the CGF SSCI Team at ssci@theconsumergoodsforum.com.

Luiza Reguse, SSCI Senior Manager

A handwritten signature in blue ink, appearing to read "L. Reguse".



Public Consultation Participants

SSCI Technical Committee Members

Ahold Delhaize

Aldi US

Asia Pulp & Paper (APP)

EMD

International Fresh Produce Association (IFPA)

Naturipe Farms

Nishimoto Wismettac

Schörghuber Gruppe

Unilever

Stakeholders who provided feedback

Agraya

DNV

Foundation FSSC

Global Canopy



Global GAP

Integralim

Japan Accreditation Board (JAB)

Marine Stewardship Council (MSC)

Peterson Solutions

Reckitt

Sustainable Forestry Initiative

Social Accountability International

US Soybean Expert Council

Part I: SSCI Benchmarking Process

Summary of Proposed Changes

- Improve efficiency by proposing a new set of eligibility criteria that are consistent with the current benchmarking process.
- Expanding participation by creating pathways for different programs to participate, broadening SSCI's coverage and addressing the unique circumstances of different programs, while maintaining robust governance criteria.
- Highlight the Annual Monitoring process to ensure ongoing compliance, relevance of continued assessment, and adaptability to various scenarios, including remote assessments.

Topic	Stakeholder Comments Received	SSCI Responses
Eligibility Criteria	<ol style="list-style-type: none"> 1. On eligibility criteria: How is independence being defined? Many scheme owners issue the certificates and the decision rests with the scheme, not the certification body. 	<ol style="list-style-type: none"> 1. The SSCI will include the term in its glossary to provide clarity and ensure a unified definition for impartiality. The SSCI process aims to verify the certification process to ensure that there is a clear separation between scheme & certification activities.
Expanding Participation	<ol style="list-style-type: none"> 1. Inclusion of non-accredited schemes – The criteria used instead of accreditation should be robust enough. Have we already detailed out these criteria? Especially the independence of the auditor/CB from the scheme owner is a very important and tricky one. (the auditor should decide about the result of the audit and whether a certificate is issued). 2. Clarify the distinction between schemes that require accreditation and "Assurance Programmes" that do not. 3. Clarify whether the new proposed changes would affect 	<ol style="list-style-type: none"> 1. The criteria for non-accredited schemes is detailed in criteria B1.01 to B1.16 of Part II: Scheme Management Requirements and were part of this public consultation. 2. Definition added to Part IV Glossary. 3. The proposed changes will be applied to programmes going through the process when applicable (e.g: criteria B1.01 to B1.16 for non-accredited programmes). For the programmes already recognised, an impact assessment will be performed by the SSCI team and the implementation of required changes will be checked

	<p>already recognised-schemes or those currently going through the process.</p> <p>4. Are on-site audits applicable to all schemes?</p>	<p>during the next Monitoring of Continued Alignment. No big impact is expected on those already recognised.</p> <p>4. Assurance programmes that use non-accredited audit firms must include on-site assessments in their process to ensure the a robust verification of the activities. The scheme owner is responsible for defining the frequency and schedule of these on-site assessments, which can be risk-based.</p>
Conditional Recognition Policy	<p>1. Will we set a pre-set maximum timeline for schemes to fix the minor gaps? If so, what would this timeline be? Also, could it be that some specifiers may not accept 'conditional recognition'?</p> <p>2. For transparency purposes, it is recommended to display the schemes with Conditional Recognition, as other recognised schemes are displayed</p>	<p>1. The timeline for closing the identified minor gaps shall be part of the corrective action plan and ideally be closed within 12 months. The progress and effectiveness of the defined corrective actions will be monitored through the annual Monitoring of Continued Alignment (MoCA) process. Upon the successful resolution of all gaps, the scheme will transition to full recognition.</p> <p>2. Schemes with Conditional Recognition will indeed be displayed on the CGF-SSCI website (and identified as such). They will also be linked to their benchmarking report. This report will provide more detail/insight on the gaps identified, the actions needed to close them, and the timeline for each action.</p>
SSCI Structure & Technical Committee	<p>1. Regarding the SSCI manager participating as an observer in all assessment activities – there may be confidential information which is kept between the assessor and the scheme owner, are there any exceptions to this or how will confidentiality be considered?</p>	<p>1. The SSCI team and the Benchmark Leaders are under a confidentiality agreement. The SSCI Manager is responsible for reviewing all benchmarks before they are presented to the Steering Committee, ensuring consistency across all benchmark processes.</p>

	<ol style="list-style-type: none"> 2. On the steering committee agreeing necessary corrective actions, is this referring to programme specific actions? 3. The benchmark leader is assigned by the SSCI manager, but the scheme owner is required to pay the fee of the benchmark leader – is there a list of available benchmark leaders that have been approved by SSCI? 4. More information requested on the benchmark leaders and how they are assigned to a scheme for assessment. 	<p>Participation in the assessment serves to ensure adherence to consistent processes, provide SSCI with feedback from scheme owners, and facilitate continuous improvement.</p> <ol style="list-style-type: none"> 2. The comment is referring to this excerpt: “The SSCI Steering Committee oversees and leads all SSCI activities. This includes defining the Coalition’s objectives and strategy (subject to approval by the CGF Board), overseeing strategy execution and agreeing on necessary corrective actions,...”. The corrective actions described in this paragraph refer to the SSCI overall strategy. The phrase was rewritten for better clarity. 3. & 4 The SSCI Benchmark Leaders are assessed, selected, and approved by the SSCI Senior Manager and the Steering Committee to perform benchmarks for the SSCI. All Benchmark Leaders undergo initial training and annual calibration activities to maintain alignment. They are under a confidentiality and impartiality agreement with SSCI. The SSCI currently has 3 approved Benchmark Leaders with extensive experience. They are assigned to an assessment scheme based on their expertise, availability, and geographical location. For impartiality reasons, schemes are not allowed to choose their benchmark leaders.
Monitoring of Continued Alignment (MoCA)	<ol style="list-style-type: none"> 1. Detailed Monitoring by itself is good. However, costs of the monitoring invoiced to the scheme may become a 	<ol style="list-style-type: none"> 1. The SSCI Monitoring of Continued Alignment (MoCA) process is designed to assess the implementation and



	<p>limitation for smaller schemes. How do we ensure that SSCI recognition is still feasible for smaller schemes?</p>	<p>effectiveness of the Scheme's policies, procedures, and previously agreed-upon action plans, ensuring continuous improvement. Recognizing that the costs incurred by schemes can be considerable, especially for the small ones, the SSCI proposes that the first two MoCAs following recognition (in years Y+1 and Y+2) be conducted remotely to limit the expense associated with in-person audits. This decision will be made for each process based on the risk and follow-up required.</p>
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Part II: Scheme Management New Accreditation Requirements

Draft requirement	Stakeholder Comments Received	SSCI Responses	Final Criteria
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<p>B1.01 If the scheme is written to issue certificates of compliance, the Scheme Owner shall require that audit firms achieve and maintain accreditation against the current version of ISO/IEC 17021-1 or ISO/IEC 17065 for the scope of the respective standard of the scheme. Requirements B1.02 to B1.09 apply to the scheme.</p> <p>If the scheme does not enable the issuing of certificates of compliance, the scheme must include:</p> <p>(a) a designated person/persons in charge of the programme and a defined procedure and requirements for auditor selection, training and qualification;</p> <p>(b) procedures for sampling methodology, audit days calculation and multisite audits</p> <p>(c) any additional objective measures to ensure that the audit firm is able to conduct audits in accordance with the policies and procedures established by the scheme owner. Requirements B1.02 to B1.09 do not apply to the scheme.</p> <p>If the scheme is written to issue certificates of compliance without formal accreditation against</p>	<p>1. Part II B1.01: there seems to be 3 options listed in this clause, namely</p> <p>1) Schemes issuing certificates of compliance with accreditation to ISO/IEC 17021-1 or 17065</p> <p>2) Schemes not issuing certificates of compliance, and</p> <p>3) Schemes issuing certificates of compliance without accreditation</p> <p>For 1) requirements B1.02 to B1.09 apply</p> <p>For 2) it is unclear which requirements apply as it only states that B1.02 to B1.09 do not apply. It needs to be clarified whether this is indeed a separate option, and if yes, what would be issued if not certificates of compliance, OR if this is intended to be included under 3), in which case B1.10 to B1.16 apply</p> <p>For 3) requirements B1.10 to B1.16 apply.</p> <p>2. Clarify whether all criteria must be met even if not all apply to a</p>	<p>1. SSCI has analysed the requirement and indeed it became quite confusing with the three different options. We've added a guideline for the accreditation chapter and detailed text to each requirement.</p>	<p>The complete, final criteria can be found in PART II v2.1. It was not included here due to its length.</p>
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the current version of ISO/IEC 17021-1 or ISO/IEC 17065, the requirements B1.01 to B1.09 do not apply to the scheme. Requirements B1.10 to B1.16 apply to the scheme.	scheme.		
B1.15 The Scheme Owner ensures that the assessment process includes an on-site audit of the audit firm.	1. Assurance Programmes – The frequency needs to be defined to ensure a harmonized approach.	1. The SSCI Team understands that the on-site audits need to be done on a regular basis - defined by the scheme owner _ and justified during the benchmarking assessment.	B1.15 The Scheme Owner ensures that the assessment process includes an on-site audit of the audit firm on a regular basis.
B1.16 The Scheme Owner has a contractual, enforceable arrangement or formal understanding that requires audit firms to be compliant with the requirements of the current version of ISO/IEC 17011.	1. Assurance Programmes - It is unclear why audit firms would need to be compliant with the requirements of ISO/IEC 17011 as this standard includes requirements for Accreditation bodies. Is it meant to be the Scheme owner that needs to operate in accordance with ISO/IEC 17011 and then the principles in ISO/IEC 17021-1 or 17065 apply to the audit firms?	1. The comment is correct, ISO/IEC 17011 is only for accreditation bodies, not for audit firms or certification bodies. The idea behind the original text was to make sure that the certification bodies will follow good auditing practices. But using 17011 accidentally suggested that they should meet accreditation-body requirements, which was not what we meant. Therefore, we propose the following requirement:	B1.16 The Scheme Owner shall require that audit firms operate in accordance with the applicable conformity assessment standards (e.g., ISO/IEC 17021-1 or ISO/IEC 17065) and apply the auditing principles and guidance of ISO 19011.
B2.05 The Scheme Owner shall develop and maintain a comprehensive quality management system that is fully documented, regularly reviewed, and continuously improved. This	1. Relationship with Audit firms: This should be a shall, making it a requirement as opposed to a recommendation. Change to:	1. Suggestion accepted	B2.05 The Scheme Owner shall develop and maintain a comprehensive quality management system that is fully documented, regularly reviewed, and continuously



<p>system should cover all aspects of the certification process, including audit planning, execution, reporting, and follow-up actions. The QMS shall be fully used by all relevant staff.</p>	<p>This system shall cover all aspects of the certification process...</p>		<p>improved. This system shall cover all aspects of the certification process, including audit planning, execution, reporting, and follow-up actions. The QMS shall be fully used by all relevant staff.</p>
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