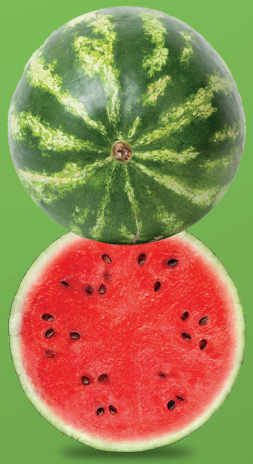
BRC GLOBAL STANDARDS

GLOBAL STANDARD
FOOD SAFETY ISSUE 8

FREQUENTLY ASKED QUESTIONS



ISSUE 8

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INTRODUCTION

A new issue of the Standard often generates questions as sites, certification bodies and specifiers ensure they understand the new requirements. The most frequently asked questions relating to Issue 8 of the Global Standard for Food Safety are detailed below.

BRC Global Standards also operate an enquiry service. If you are unable to find an answer to your particular question, then please contact enquiries@brcglobalstandards.com

GENERAL QUESTIONS – BACKGROUND

WHY DID ISSUE 7 NEED CHANGING?

Food safety does not stand still; new risks, legislation and practices to improve food safety are continually emerging so as a matter of principle the BRC Standards need to be periodically reviewed and updated. The most significant changes in Issue 8 concern:

- Expansion of the requirements for environmental monitoring
- Further development of requirements relating to food defence/product security
- Additional requirements to assist sites with the packing and labelling of products
- Re-organisation of the requirements for high-risk, high-care and ambient high-care production risk zones
- Addition of requirements for traded products (in Issue 7 these formed a separate voluntary module)

IS A DOCUMENT HIGHLIGHTING THE CHANGES FROM ISSUE 7 TO ISSUE 8 AVAILABLE?

Key Changes Issue 7 to Issue 8 is available from the BRC bookshop (http://www.brcbookshop.com/p/1808/brc-global-standard-for-food-safety-issue-7-guide-to-key-changes-unlocked-pdf-version) and on BRC Participate (www.brcparticipate.com). It highlights all of the changes that have been made to the requirements provides explanation as to the reasons for the changes.

WHEN WILL AUDITS AGAINST THE NEW ISSUE OF THE STANDARD BEGIN?

All audits from 1st February 2019 will be completed to Issue 8 of the Standard.

CAN A SITE BE AUDITED TO ISSUE 8 BEFORE 1ST FEBRUARY 2019?

No, audits to Issue 8 commence on 1st February 2019.

OUR SITE IS IN THE UNANNOUNCED AUDIT PROGRAMME. WILL WE HAVE AN ISSUE 7 AUDIT OR AN ISSUE 8 AUDIT?

This will depend on when your audit takes place:

All audits from 1st February 2019 will be completed to Issue 8 of the Standard. If your audit occurs after this date, then it will be an Issue 8 audit. If the audit starts before 1st February, then it will be an Issue 7 audit.

Sites whose unannounced audit window spans the periods before and after 1st February are advised to discuss this with their certification body.

WILL SITES RECEIVE A NON-CONFORMANCE IF THEY IMPLEMENT ISSUE 8 CHANGES NOW?

Sites will not be issued a non-conformity for updating their systems to comply with Issue 8 requirements prior to 1st February 2019. In fact, it is good practice to commence any necessary updates to systems and procedures at the earliest opportunity to ensure sufficient transition period to proactively integrate Issue 8 requirements into the existing site processes and practices.

Issue 8 of the Standard incorporates most of the requirements from Issue 7 (with the exception of Issue 7 section 3.12 Customer Focus). Therefore, a site should still be able to demonstrate compliance to Issue 7 whilst implementing Issue 8 updates.

WHAT HAS HAPPENED TO THE UNANNOUNCED AUDIT PROGRAMME?

Previous versions of the Standard provided two options for unannounced audits:

- OPTION 1 A single unannounced audit

- OPTION 2 A split audit with an unannounced audit of good manufacturing practices and a later, announced audit primarily to review records and procedures.

The option 2 split audit has consistently proven to be unpopular, with very few sites selecting to be audited in this way. It has therefore been removed from the Standard. The unannounced audit programme remains voluntary and a site can choose whether their audit will be announced or unannounced.

HOW DO I DOWNLOAD A COPY OF THE STANDARD?

The Standard is freely available to download from the BRC bookshop (www.brcbookshop.com).

Access to all the BRC Standards and all of the guidelines published by the BRC Global Standards are also available on our online information management platform, BRC Participate (www.brcparticipate.com).

WHAT HAS HAPPENED TO THE BRC GLOBAL MARKETS PROGRAMME?

The BRC Global Markets Programme has been completely reviewed and updated. It will be published in December 2018 as the new BRC Global Standards *START!* programme. Copies will be available from both BRC Participate and BRC Bookshop (refer to above question for details on these websites).

WHERE DO I FIND THE DIFFERENT LANGUAGE VERSIONS OF THE BRC STANDARD?

The different language versions can be found on the BRC Participate information management platform (www.brcparticipate.com) or are available from the BRC bookshop (www.brcbookshop.com).

Simply click on the free download of the English Standard and then scroll down to find the alternative language versions.

WHERE CAN I DOWNLOAD A COPY OF THE SELF-ASSESSMENT DOCUMENT FOR ISSUE 8 OF THE STANDARD?

This document is available from our Global Standards website at http://www.brcglobalstandards.com/Manufacturers/Food/GuidanceandFAQs.aspx and from BRC Participate (www.brcparticipate.com).

WHAT WOULD YOU EXPECT TO SEE FOR A RISK ASSESSMENT, SINCE THE STANDARD BASES MANY OF ITS REQUIREMENTS ON THIS?

We would expect to see documented evidence of the thought processes and conclusions made regarding the risks to products by the specific situation or hazard being considered.

The principles and objectives behind a risk assessment are to ensure that the company has considered the issues relevant to the requirements and introduced relevant controls (e.g. procedures, policies or actions) based on the assessment. The risk assessment and associated controls must be justifiable and it is likely that the auditor will challenge this by asking the site to demonstrate the thoroughness of the assessment and/or the justification of the conclusions). In some instances, it would be appropriate to have a detailed document (along the principles of a HACCP plan) showing those considerations; examples of this could be the risk rating for suppliers and the subsequent approval process, or an inclusion in the HACCP plan of the risks to product from physical contamination. However, other requirements (such as the policy concerning where beard snoods must be worn) could be evidenced in other ways – these could range from a documented policy and the reasoning behind it, to the understanding by staff of the need for its implementation. This policy would include considerations of best practice within the industry and be open to challenge by an auditor. The need for a documented risk assessment would be particularly pertinent where you have decided not to adopt procedures for a particular requirement (such as not wearing beard snoods in a particular area).

QUESTIONS RELATING TO THE AUDIT PROTOCOL

AUDIT DURATION

WILL THE AUDIT DURATION CHANGE FOR ISSUE 8 AUDITS?

The time required for Issue 8 audits is expected to be very similar to those for Issue 7 (i.e. typically a total audit time of 2 days).

Additional time will still be required for any voluntary additional modules that are added to the audit.

ADDITIONAL MODULES

WHAT ARE ADDITIONAL MODULES?

The Standard has been designed to enable additional modules to be included in the scope of the audit. The aim of these additional modules is to enable sites to demonstrate compliance with specific sets of requirements in order to meet specific market or customer requirements without the need for a separate audit, thus reducing the number of separate audits at the site.

It is expected that new modules will continue to be developed and become available for use throughout the life of Issue 8. A list of available modules will be kept on the BRC Global Standards website (www.brcglobalstandards.com) and the applicable requirements and any specific protocol will be available to download from our bookshop (www.brcbookshop.com) and from the BRC Participate website (www.brcparticipate.com).

If a site wishes to include an additional module (or modules) within the scope of its BRC Global Standards audit, then it must notify the certification body in advance of the audit.

CAN TRADED (FACTORED) PRODUCTS BE INCLUDED IN THE SCOPE OF THE BRC GLOBAL STANDARDS AUDIT?

Traded products are goods that are not manufactured or further processed on site but bought from an outside supplier, stored at the site and sold on. They are often products bought in by a company to complement either a range of products manufactured or to provide a more comprehensive product range.

Packing or repacking operations are considered to be process steps therefore if products are subject to any of these activities, they cannot be called as traded goods.

For Issue 7, BRC Global Standards developed and published Traded Goods Additional Module. For Issue 8, the requirements for traded products were incorporated into the main Standard (section 9 of the Standard). This section of the Standard remains voluntary, however where a site opts to include this module within their audit scope, any non-conformities raised against this section will contribute towards site's overall audit grade.

If a site wishes to include traded products within the scope of its Food Safety audit, then it must notify the certification body in advance of the audit.

WILL THE ADDITIONAL MODULE NUMBERS REMAIN THE SAME FROM ISSUE 7 TO ISSUE 8?

Numerical order for most of the additional modules remain the same however some numbers have slightly changed:
ADDITIONAL MODULE 10: GLOBAL G.A.P. CHAIN OF CUSTODY
ADDITIONAL MODULE 11: MEAT SUPPLY CHAIN ASSURANCE
ADDITIONAL MODULE 12: ASSOCIATION OF EUROPEAN COELIAC SOCIETIES (AOECS)
ADDITIONAL MODULE 13: FOOD SAFETY MODERNIZATION ACT (FSMA)

EXCLUSIONS FROM SCOPE

HAVE THE RULES FOR EXCLUSION FROM SCOPE CHANGED?

We have deliberately maintained the rules on exclusions from scope. There are a number of reasons for this, including:

- to minimise the potential for a product or activity that is outside the scope to have an adverse effect on products or processes that are in scope
- to ensure that no stakeholder using the report or certificate can misunderstand the scope of the audit
- to protect the reputation of the audit, BRC Global Standards and the certification body in the event of an out-of-scope product or activity causing a problem at a site.

The Standard states that products can only be excluded if:

- the excluded product(s) can be clearly differentiated from products within scope (i.e. they have a different physical appearance or packaging)

AND

- the product(s) are produced in a physically segregated area of the factory (i.e. they are produced in a physically separate area and not in the same room).

The BRC Global Standards logo may only be used by sites where there are no exclusions from scope.

NEW FACTORIES

WHEN CAN WE BOOK AN AUDIT FOR OUR NEWLY BUILT FACTORY?

Manufacturing units that are newly built or 'commissioned' must ensure that their systems and procedures are compliant before the initial BRC Global Standards audit is undertaken. Whilst it is at the discretion of the company when to invite a certification body to carry out an audit, it must be able to demonstrate that its systems and processes are well established, compliant and monitored. It is therefore unlikely that full compliance could be satisfactorily demonstrated within the first 3 months of operation. A company may wish to consider a pre-assessment towards the end of this 3-month period.

NON-CONFORMITIES

OUR SITE HAS HAD A BRC GLOBAL STANDARDS AUDIT AND WE ARE NOT HAPPY WITH THE NON-CONFORMITIES IDENTIFIED OR THE GRADE AWARDED – WHAT CAN WE DO?

The company has the right to appeal against the certification decision made by the certification body, and this should be made in writing to the certification body within 7 days of the decision. The certification body shall give a full written response within 30 days following a full and thorough investigation.

If a site appeals against a non-conformity within the 28 days following an audit, then it should be noted that the site is still expected to progress corrective action and submission of the evidence for this to the certification body.

If resolution cannot be attained by the two parties then the company also has the option to contact the BRC Global Standards.

WHAT INFORMATION MUST BE INCLUDED IN THE PRODUCT SAFETY RATIONALE?

The aim of Product Safety Rationale is as an aide memoire of the most vital features that would make products safe to consume. Relevant information to be included will be dependent on the product type and product safety controls used to produce the product. It may therefore contain a range of different parameters such as cooking time/temperature, water activity (Aw), pH, storage conditions, etc. Sites are ultimately responsible to understand the key product safety controls for their products and be able to articulate them to the auditor.

IS THE REQUIREMENT TO CLOSE NON-CONFORMITIES FOR THE ADDITIONAL MODULES WITHIN THE 28 DAYS DETAILED IN THE STANDARD?

Management of non-conformities is explained in protocol sections for individual modules

IS THERE A REQUIREMENT FOR A SITES TO INCLUDE A ROOT CAUSE ANALYSIS IN CLOSING OUT NONCONFORMITIES FROM AN AUDIT?

This requirement hasn't changed from Issue 7 to 8. The site will need to identify the root cause so that they can develop a proposed preventive action plan. The effectiveness of this root cause and preventive action plan will be assessed at the next audit (clause 1.1.12).

AUDIT SCOPE

WHY IS PET FOOD ADDED TO BRC FOOD SAFETY STANDARD?

Pet food has always formed part of the permitted scope of the Standard. This is because the manufacture of pet food often follows similar production processes and similar legislation. However, Issue 8 contains 3 new requirements which are only relevant to the pet food manufacturers.

It should be noted that animal feed (e.g. for livestock, wild animals or wild animals kept in captivity) is not permitted in the scope as this is considerably different in product composition and is governed by different legislative requirements.

CAN A BRC CERTIFICATED FOOD MANUFACTURING SITE, PRODUCE PET FOOD AND IS THIS PERMITTED WITHIN THE SCOPE OF THE STANDARD?

The BRC Global Standard for Food Safety does allow pet food to be included within the scope of certification.

Before starting however, the site needs to ensure they understand any relevant legislation regarding pet and human food production in the same facilities. This legislation varies in different countries (for example in different countries across the EU) with some having considerable restrictions.

QUESTIONS RELATING TO SPECIFIC REQUIREMENTS OF THE STANDARD

1 SENIOR MANAGEMENT COMMITMENT

CLAUSE 1.1.2: WILL THE FOOD SAFETY CULTURE MODULE NOT BE AUDITED UNTIL 2020?

This new clause requires the sites to introduce and implement a plan for development and continuous improvement of their food safety culture. In the first year of the Issue 8 standard, sites would be expected to have developed the plan of action to improve food safety and quality culture and demonstrate implementation of planned actions has commenced at their first audit against Issue 8. However, as 3rd bullet point is asking for evidence for review of effectiveness of commissioned action plan it cannot be audited until year two.

It must be emphasised here that auditors are not expected to be auditing "food safety culture" of the site which is to a large extent subjective but the evidence of compliance to requirements of the clause as explained above.

CLAUSE 1.1.7: WHERE CAN I FIND A LIST OF THE POSITION STATEMENTS?

Position statements can be found on the BRC Global Standards website (www.brcglobalstandards.com/Manufacturers/Food/FoodIssue7.aspx) and on our online subscription service, BRC Participate (www.brcparticipate.com).

2 THE FOOD SAFETY PLAN – HACCP

WILL A SITE RECEIVE NON-CONFORMANCE FOR USING FSMA TERMINOLOGY (E.G. PREVENTIVE CONTROLS) INSTEAD OF THE CODEX TERMS IN THEIR FOOD SAFETY PLANS?

Specific terms (such as pre-requisites or critical control points) are drawn from global terminology to describe expectations. Sites are not required to adopt this specific terminology and alternative terminology may therefore be acceptable, providing it is evident that all the requirements of the Standard have been fully met. For example, legislative requirements in the US (detailed in the Food Safety Modernization Act) use different terminology (such as preventive controls) but still incorporate all the requirements of the Standard.

CLAUSE 2.7.1: ARE IRRADIATED INGREDIENTS THE INTENT BEHIND ADDITION OF RADIOLOGICAL CONTAMINANTS TO THIS CLAUSE?

Primary reason for including radiological as a separate hazard (it was previously included within chemical hazards) based on that feedback received from various working groups which indicated this would aid clarity to the requirement, especially as radiological hazards are listed separately in certain country specific legislative requirements.

The aim of this clause is to identify all relevant hazards and therefore it is important to consider potential contamination with radioactive isotopes which may be present in water or soil (either from a naturally occurring source or resulting from a man-made disaster).

If the site is also aware of any potential hazards from irradiated material (for example, it is not permitted in the intended country of sale) then this should also be considered as a hazard in the context of this clause.

CLAUSE 2.8.1: ARE PREVENTIVE CONTROLS (AS DEFINED IN FSMA LEGISLATION) TO BE CONSIDERED AS CRITICAL CONTROL POINTS (CCPS)? OR JUST THOSE THAT ARE NOT CONSIDERED PREREQUISITE PREVENTIVE CONTROLS?

CCP's are Process Preventive Controls (PPC's) in a FSMA-compliant Food Safety plan, but it doesn't matter which they are referenced as their management (for certification purposes) would be the same. Other Preventive Controls were formerly PRP's (pre-requisite plan) and in some cases, parts of them are elevated to Preventive Controls such as Food Allergen, Sanitation, Supply Chain, based on known or reasonably foreseeable risk of a SAHCODHA(serious adverse health consequence or death to humans or animals) hazard.

The management components of those PC's will not contain all the same elements of CCP's/PPC's as some do not apply. It would be expected that the site combines the most stringent requirements of FSMA and BRC together. For example, a Sanitation PC doesn't

require validation for allergen cleaning under FSMA but it is required under BRC, therefore the standard would expect additional compliance to this requirement.

3 FOOD SAFETY AND QUALITY MANAGEMENT SYSTEM

HAS THE EXPECTATION OF THE WORD 'DOCUMENTED' CHANGED AS IT WAS REMOVED FROM VARIOUS SECTIONS/CLAUSES WITHIN THE ISSUE 8 STANDARD?

In many instances, the Standard specifically states that requirements shall be satisfied by documented procedures; in others, this is implied as the company needs to demonstrate that systems are in place. The Standard requires policies, procedures, records, risk assessments etc, to be documented in detail to ensure consistent application throughout the site. They must be demonstrable and made available to the auditor as an evidence that activities have been completed. These documents can either be a hard copy (i.e. paper-based) or electronic version.

This is explained further in the Key Changes Issue 7 to Issue 8 which is available from the BRC bookshop. (http://www.brcbookshop.com/p/1808/brc-global-standard-for-food-safety-issue-7-guide-to-key-changes-unlocked-pdf-version) and on the BRC Participate (www.brcparticipate.com).

CLAUSE 3.4.1: DOES THE STANDARD REQUIRE 4 SEPARATE INTERNAL AUDITS AT SITES PRODUCING SEASONAL PRODUCTS WHERE THE SITE IS ONLY OPEN FOR PART OF THE YEAR?

For seasonal production, particularly when the season is very short (e.g. 4 weeks or less), the site must have in place a system for the management of start-up processes. The site is not expected to complete a series of internal audits when the site is not operating; however, internal audits are expected to start before the season commences to ensure that the site is ready to start production. For example, the HACCP programme should be audited to ensure that it is up to date and appropriate for the forthcoming production; that hygiene and fabrication are correct; and that staff are appropriately trained. The remaining areas of the internal audit programme should be covered throughout the season. Evidence of this 'pre-start internal auditing' must be demonstrable (i.e. it should be documented and available during the audit).

Further information is available in the BRC Global Standards Fresh Produce Guideline available on BRC Participate and on the BRC Bookshop.

CLAUSE 3.4.2: WHAT TRAINING DO INTERNAL AUDITORS HAVE TO COMPLETE AND WHAT DOES 'INDEPENDENT' MEAN?

Internal auditors should be able to show (via training records) that they have received formal training via either attendance on an external course or training within the company. Training should cover the planning and scheduling of internal audits, preparing reports, the correct use of audit techniques (e.g. process auditing, audit trails and interviewing) and following up of audit findings.

The objective behind the requirement for auditors to be independent (i.e. to not audit their own work) is to ensure that the auditor is rigorous and thorough and not influenced by the work which may be needed to make corrections and improvements.

The use of an external consultant is acceptable, providing that the internal audit programme is scheduled throughout the year and not in a single block of activity.

CLAUSE 3.5.1.5: IF A SITE PURCHASES RAW MATERIALS FROM AN AGENT WHO IS CERTIFICATED TO A BRC GLOBAL STANDARD, WOULD THEY STILL BE EXPECTED TO OBTAIN DETAILS OF THE LAST MANUFACTURER OR PACKER?

Where the site is certificated to an appropriate BRC Global Standard or GFSI benchmarked equivalent then the clause indicates that the supplier approval requirement is already covered by their certification, however the customer would still require the information regarding the identity of the last processor or packer.

CLAUSE 3.5.1.6: HOW DO WE ENSURE THAT OUR RAW MATERIAL SUPPLIERS HAVE EFFECTIVE TRACEABILITY SYSTEMS?

Sites must ensure that their raw material suppliers (excluding packaging suppliers) have suitable traceability systems in operation. This assurance can be obtained from certification, auditing or by directly testing traceability. Examples include:

- Where the raw material supplier is certificated to a GFSI-benchmarked standard, assessment of traceability systems will form part of these audits and therefore no additional action is required to comply with the requirements of this clause. However, a communication mechanism should be in place, such that if the raw material supplier were no longer to be certificated, the site would be made aware of this change.

- If the raw material supplier is audited by the site and the audit includes an assessment of the traceability systems, this would comply with the requirement of clause 3.9.3 as traceability would have been assessed.
- If supplier approval is based solely on a questionnaire with no additional testing of the traceability system, additional traceability verification is required unless the raw material is a primary agricultural product purchased directly from a farm or fishery, where additional testing of the traceability system is not mandatory. This additional verification could include, for example:
  - a test of the raw material supplier's traceability system. For example, as part of the site's traceability test (refer to clause 3.9.2), a relevant ingredient is highlighted. The ingredient and batch details for the material are forwarded to the supplier to enable them to complete the traceability test for the specific batch of raw material and forward the relevant records back to the site.
  - a worked example from the raw material supplier, which clearly shows how the traceability works.
  - a detailed description of the traceability system, provided by the raw material supplier.

CLAUSE 3.5.1.6: HOW SOON MUST VERIFICATION OF OUR RAW MATERIAL SUPPLIER'S TRACEABILITY SYSTEMS BE COMPLETED?

The Standard expects verification of a raw material supplier's traceability systems to occur over a 3-year period, in line with the minimum 3-year re-issue of supplier approval questionnaires. It therefore follows that, as a guide, all supplier traceability systems must be completed within a 3-year cycle. Consequently, you should be able to demonstrate verification of the traceability system for at least a third of the suppliers in Year 1, two-thirds by Year 2 and all suppliers by Year 3.

CLAUSE 3.5.4: IF PART PROCESSING OF A PRODUCT IS COMPLETED AT ANOTHER SITE AND THE PROCESSED PRODUCT DOESN'T RETURN TO THE CERTIFICATED SITE, IS THIS CONSIDERED OUTSOURCED PROCESSING OR SUBCONTRACTED SERVICE? (FOR EXAMPLE, HIGH PRESSURE PROCESSING OR A PROCESS/CONTRACT BLENDING OPERATION INTO A FULLY ENCLOSED PACKAGE)?

Outsourced processing is where an intermediate production process or step in the manufacture of a product is completed at another company or site before being returned to certified site for completion of production/packing operation. If the product doesn't return to site for a further process step, then it falls outside the definition of an outsourced process and is categorised as a subcontracted service.

An outsourced product would normally be permitted to appear in scope.

Packing of products by third parties (e.g. contract packing) has been removed from this section as this should not form part of the scope of the audit (the packing site can have its own site certification).

CLAUSE 3.5.4.1: WHY DOESN'T THE STATEMENT OF INTENT (3.5.4) REFER TO CONTRACT PACKING BUT THE CLAUSE (3.5.4.1) DOES?

Clause 3.5.4.1 is primarily focused at communication to brand owners and both outsourcing of production and the use of an external packing company are of relevance to the brand owner. Whereas the rest of the requirements in this section specifically refer to outsourced processes.

SECTION 3.9: WOULD SHRINK WRAP AND PALLET SLIPS BE CLASSED AS PRIMARY PACKAGING?

Primary packaging is defined as packaging that constitutes the unit of sale to the end consumer or customer. As shrink wrap or pallet slip sheets are not items that a consumer would see/take home, therefore, these items are not considered as primary packaging.

However, when identifying primary packaging due consideration must be given to processes to minimise or eliminate any risk which may result in contamination of food product, for example:

- Using suitable food contact materials
- If the food contact material is a permeable substance, then anything stuck onto the surface should also be considered (migration of inks through cardboard for example, is a well-documented risk which has affected a range of packing).

As a general rule, the Standard would not expect transit materials to be classed as primary packaging for example, pallets, pallet wrap, any label on the outside of the pallet wrap, etc

CLAUSE 3.9.3: IS 100% TRACEABILITY RECOVERY NO LONGER REQUIRED? (THE WORD 'FULL' WAS REMOVED FROM CLAUSE)?

The word 'full' was removed from this clause as it was a common cause of confusion during Issue 7. However, the meaning and intent of the clause remains unchanged from Issue 7 to Issue 8.

It is unlikely that the mass balance check will be able to account for all materials to an accuracy of 100%; however, the company needs to be able to justify any discrepancies and demonstrate that it understands the nature of the variance (e.g. through processing factors such as dehydration of fresh ingredients, typical wastage on equipment, or portion variances).

The Standard requires the site to test traceability 'across the range of products' each year. Where the traceability for all products manufactured by the site is the same or similar, then a minimum of one traceability test a year must be completed. However, if there are significant differences or specific traceability challenges relating to one product or a group of products, this may necessitate additional tests specifically related to that product or group of products.

In addition, where the site makes a product claim, the requirements of clause 5.4.4 apply (i.e. traceability tests should occur at a frequency to meet any particular scheme requirements or at least every 6 months in the absence of a scheme-specific requirement).

CLAUSE 3.11.2: WHAT EVIDENCE IS ACCEPTABLE TO SHOW COMPLIANCE TO KEY TIMINGS FOR A MOCK RECALL?

The standard requires an actual record of the times at which key activities took place. For example, time the mock activity started, time traceability exercise completed, etc.

CLAUSE 3.11.4: WHAT IS CLASSIFIED AS A 'SIGNIFICANT FOOD SAFETY ISSUE'?

Where a significant food safety issue occurs, the site manufacturing or processing the implicated product is required to notify their certification body of the situation. This is to ensure that the integrity of the certificate can be maintained by allowing the certification body to assess whether the incident affects the certification. Situations which should be notified to the certification body include:

- all product recalls
- any situation where regulatory authority insists on action (e.g. an enforcement notice) due to product safety or legality concerns
- legal proceedings with respect to product safety or legality
- adverse media attention relating to product safety
- any food safety incident with the potential to harm a consumer

It should be noted that only the site where an issue occurs is required to notify their certification body.

4 SITE STANDARDS

CLAUSE 4.6.2: THE STANDARD REQUIRES EQUIPMENT TO BE SUITABLE FOR FOOD CONTACT WHERE APPROPRIATE AND TO MEET LEGAL REQUIREMENTS, BUT WE CAN'T OBTAIN A CERTIFICATE OF CONFORMITY FOR MACHINERY WE'VE HAD ON SITE FOR YEARS. WHAT CAN WE DO?

The requirement is designed to ensure that manufacturers are complying with relevant legislation (e.g. the EU Materials and Articles Intended to Come into Contact with Food Regulations 2012) and that the materials do not constitute a hazard to food.

CLAUSE 4.9.6.2: IF A FACTORY HAS PENS WITH SMALL DETACHABLE PARTS SHOULD THEY BE REPLACED WITH A NEW DESIGN WITH NO SMALL PARTS TO ENSURE COMPLIANCE TO THE NEW CLAUSE?

It is good practice to restrict the purchase of pens so that any breakage does not result in small pieces of undetectable plastic in products. Pens used in open product areas therefore need to be controlled to minimise this risk of physical contamination (e.g. designed without small parts and detectable by foreign-body detection equipment).

However, internal parts may not be relevant unless they can 'fall out' or become detached. Small external parts that can detach or fragile bits that can easily break off are the concern that the Standard expects sites to consider.

CLAUSE 4.10.3.4: WHY DOES THE CLAUSE NOT REQUIRE X-RAYS TO MEET THE REQUIREMENTS?

X-ray detectors generally require slightly different test procedures and the working group felt that including both metal detector and x-ray in the same clause would confuse rather than improve operation.

It should be noted that clause 4.10.3.3 requires sites to have a defined procedure for set up and testing of the x-ray and therefore auditors would still expect sites to have properly documented operating systems in place.

CLAUSE 4.10.3.4: WHAT IS MEANT BY 'CHECKS OF FAILSAFE SYSTEMS'?

Many modern designs of metal detector (and other foreign-body detection systems such as X-rays) have failsafe systems. These are systems that monitor their own functions and raise an alarm (usually audible) if something stops working. For example, if the product rejection system is powered by compressed air and the air supply fails, this will sound the alarm immediately allowing staff to

investigate the fault, rather than waiting until the next metal detector check finds there is a problem. Where these systems exist, it is important to run occasional checks to make sure that the failsafe system itself is operating (e.g. that the alarm will sound).

The Standard does not expect sites to purchase new metal detection equipment if there is no failsafe system on their current equipment.

SECTION 4.11.8: CAN YOU PROVIDE SOME EXAMPLES OF TARGET ORGANISMS THAT WILL BE ACCEPTABLE IN OPEN PRODUCT AREAS WHERE THE PRODUCT IS NOT HIGH CARE OR HIGH RISK?

It is difficult to provide a definitive list for relevant target organisms for all product categories as these will vary according to product type and process step.

The section on environmental monitoring indicates that the sites environmental monitoring programme should be risk based, therefore the food safety plan/HACCP may be indicative of risks that should be monitored. Risks may include pathogens and/or spoilage organisms (such as yeasts or moulds) and the site should consider whether it is more suitable to monitor the risk directly or via indicator organisms.

BRC Global Standards will publish additional guidance on environmental monitoring which will be available on BRC Participate.

5 PRODUCT CONTROL

CLAUSE 5.2.5: WHAT WOULD BE EXPECTED FOR A COOKING VALIDATION WHEN THE COOKING INSTRUCTIONS USE A MICROWAVE, GIVEN THAT MICROWAVES VARY IN POWER AND EFFICIENCY?

Microwaves certainly provide some additional challenges to the validation of cooking instructions.

The key aim of the requirement is to ensure the target product will be sufficiently heated to destroy and remove any appreciable risk of food poisoning from key heat resistant pathogenic bacteria which may, or may not be present in the food, especially those able to grow at (chilled) storage temperatures. Campden Bri (a food research association based in the UK) have produce a short technical document which covers many of the challenges associated with the validation of cooking instructions. It is available on BRC Participate (www.brcparticipate.com).

CLAUSE 5.4: DO WE NEED TO CONSIDER PACKAGING IN FOOD FRAUD RISK ASSESSMENTS?

Section 5.4 applies to food raw materials and ingredients therefore packaging does not need to be considered under this section.

CLAUSE 5.4.4: IF A SITE MAKES MULTIPLE CLAIMS (E.G. PROVENANCE CLAIMS AND GMO FREE), DO THEY NEED TO CONDUCT A MASS BALANCE TEST EVERY 6 MONTHS FOR EACH CLAIM OR A SINGLE MASS BALANCE TEST EVERY 6 MONTHS?

Where a site makes a product claim, the Standard requires traceability and mass balance tests to occur at a frequency to meet any particular scheme requirements that the claim is certificated by or at least one test every 6 months in the absence of a scheme-specific requirement. This means that the site will be expected to complete at least 2 traceability tests per year, not 2 tests per claim per year.

SECTION 5.8: SHOULD ALLERGENS BE CONSIDERED AND CONTROLLED AT PET FOOD MANUFACTURING SITES?

Sites are required to meet the appropriate allergen management legislation in the country of intended sale of the products. Therefore, if there is no legislation relating to allergens in pet food, this section of the Standard may be considered 'not applicable'.

However, in some parts of the world allergen claims (eg gluten-free or dairy-free) are made on pet food products. Therefore, where a site makes an allergen claim on a pet food the site is required to meet ALL of the requirements within section 5.3.

Please note this reflects an update from the requirements for Issue 6 and 7 which required pet food manufacturers to meet the requirements of this section regardless of whether a claim was being made or not.

6 PROCESS CONTROL

No questions have been asked relating to this section of the Standard.

7 PERSONNEL

CLAUSE 7.2.1: CAN ITEMS SUCH AS A "FITBIT" AND "APPLE" WATCHES BE CONSIDERED UNDER ACCEPTABLE PERSONAL ITEMS FOR A MEDICAL ALERT?

The key aim of this clause is to enable the site to eliminate potential sources of contamination, including jewellery. It is therefore good practice to minimise the number and type of items that are permtted within production areas. Exceptions are made for simple wedding bands, other religious items that would be inappropriate to ask staff to remove and medical items.

Medical alerts items actually refer to items where it is vital that information is available in an emergency (e.g. individuals with severe allergy) and the absence of the information could delay emergency treatment.

Generally, Fitbit style products do not contain emergency information or linked with ongoing medical treatment, but exceptions may apply. In any situation where an item needs to be permitted, the site should complete a risk assessment and put in place suitable controls to prevent product contamination.

8 HIGH RISK, HIGH CARE AND AMBIENT HIGH CARE PRODUCTION RISK ZONES

IF A SITE PACKS PRODUCT PREPARED OR MANUFACTURED AT OTHER SITES. DOES IT NEED TO FOLLOW THE HIGH-RISK OR HIGH-CARE REQUIREMENTS IN THE STANDARD?

The principle of the production risk zones in the Standard is to ensure that the environmental conditions and controls in open product areas are appropriate for the products being handled. Therefore, the expectations for factory hygiene, finish of buildings, equipment, protective clothing and staff hygiene should reflect the potential risks to the product.

Where a product requires high-risk or high-care production zones during its manufacture and initial packing (refer to appendix 2 of the Standard for details of these products), equivalent controls are expected for any subsequent handling or re-packing operation where the product is open to the factory environment (i.e. the re-packing site is expected to have equivalent facilities).

CLAUSE 8.4.1: DO HIGH-RISK AND HIGH-CARE CLOTHING NEED TO BE SEPARATED, IF BOTH ARE USED IN THE SAME SITE?

The expectations for compliance to this clause hasn't changed from Issue 7 to 8. Where a site has a high-risk and/or high-care area it must be separate from any lower risk area, therefore by definition a high-risk would need to be separate from a high-care area. The same principle applies to protective clothing, equipment, changing areas, etc.

Further explanation can be found in the Interpretation Guideline for Issue 8 and the BRC Global Standards Understanding High-Risk, High-Care and Ambient High-Care. Both of these guidance documents are available on BRC Participate. (www.brcparticipate.com).

CLAUSE 8.4.1: ARE BOOT-WASH FACILITIES ACCEPTABLE AT THE ENTRANCE TO HIGH-RISK AREAS?

The site needs a system to control footwear effectively. This may include:

- the use of clean footwear to be worn only in the high-risk area and the provision of effective measures for changing into such footwear
- by exception, the use of boot-wash facilities at the entrance to the high-risk area. This will be acceptable where such facilities demonstrably provide an effective control. The site must have undertaken a risk assessment to identify the suitability of the boot-wash facilities and the controls to manage the effective sanitation of footwear.

For such controls to be effective they would be expected to include the following:

- The potential for cross-contamination of boots prior to boot washing must be considered. Permitted areas where footwear can be worn prior to entry to a high-risk area must be clearly defined (e.g. the same footwear must not be worn outside the facility or in low-risk processing areas).
- The boot-wash equipment must be suitably designed, well maintained and demonstrably effective in cleaning and sanitising the footwear.
- The minimum cleaning time and concentrations of detergent and sanitiser used must be determined, monitored and controlled to ensure effective cleaning of footwear.
- A cleaning schedule (i.e. a schedule for the cleaning of the boot-wash facility and equipment) should be in place to ensure that the boot wash does not become a source or vector of microbiological contamination.
- Records must be maintained of detergent/sanitiser checks and of the effectiveness of the boot-wash facilities.

Regardless of the method of footwear control, the site must ensure that:

- the footwear controls are validated by microbiological monitoring of the factory environment (e.g. the footwear, floors and drains in the high-risk area) to demonstrate the absence of pathogens such as Listeria species

- the footwear is company-issued and of a design that is easily cleaned (i.e. smooth upper surfaces, cleats on soles that are sufficiently spaced so as not to trap dirt which may not be easily removed by boot-wash equipment).

CLAUSE 8.4.1: DO BULLET POINTS 3 AND 4 REFER TO ONE ACTION OR TWO SEPARATE ACTIONS (I.E. IS THE OPERATIVE REQUIRED TO WASH THEIR HANDS AFTER THEY PUT THEIR HAIR NET AND BOOTS ON, AND THEN AGAIN BEFORE THEY GO IN TO PRODUCTION OR WOULD IT BE ACCEPTABLE TO WASH THEIR HANDS ONLY ONCE AFTER THEY HAVE PUT THEIR HAIR NET AND BOOTS ON).

For high risk areas the intention is that both of these actions are completed – during the changing and before entry to the area. This is to minimise the risk of contamination of hands during the changing operation particularly when handling the hair and footwear.

CLAUSE 8.5.2: IS VISUAL INSPECTION STILL A METHOD OF DETERMINING CLEANING ACCEPTABILITY SINCE CLAUSE 8.5.1 REQUIRES MICROBIAL LIMITS?

The Standard provides some flexibility so that sites could use appropriate systems when designing systems to adhere to above clause. However, visual clean will be less relevant in high-risk and high-care areas than in other parts of the site. It is expected that sites will have different systems for validation and verification of the cleaning procedure, compared with ongoing routine monitoring. It is ultimately the responsibility of the site to develop appropriate controls and then be able to justify them to the auditor.

9 TRADED GOODS

IS SECTION 9 OF ISSUE 8 STILL A VOLUNTARY ADDITIONAL MODULE AND SITE'S CHOICE WHETHER TO INCLUDE IT IN THE SCOPE OF THE AUDIT OR NOT?

It is still a voluntary additional module and a site may choose to include it in the audit scope. However, it is worth noting that where a site handles traded products but elects to omit this activity from the scope of the audit, this is recorded as an exclusion from scope on the audit report and certificate.

IF A SEALED PRODUCT IS PURCHASED AND THEN ADDED TO A BOX THAT INCLUDES ITEMS MANUFACTURED AT THE SITE, WOULD THIS BE A TRADED PRODUCT OR PART OF THE MAIN SCOPE?

The section on traded products only relates to those situations where a site purchases, stores and sells the material, but does not complete any processing or packing activity. Therefore the process described in the questions is considered part of the production process for the final product, and must therefore meet the requirements of section 1 – 8 of theStandard rather than section 9. The wording of the scope (on the certificate and audit report) will ensure that it does not imply the purchased item is manufactured onsite.

IF A SITE SENDS A RAW MATERIAL TO ANOTHER COMPANY AND FINISHED GOODS RETURN TO SITE CAN THE COMPANY INCLUDE THIS CONTRACT MANUFACTURED PRODUCT AS A TRADED PRODUCT? WOULD THIS CHANGE IF THE PRODUCT WAS LABELLED ON RETURN?

If the product comes onto the site and simply stored and dispatched, then it is a traded product. However, if any further activity is undertaken for example a labelling process after the product returns to the site, then the activity that was completed offsite should be considered an outsourced process.

A BRC GLOBAL STANDARDS CERTIFICATED SITE INTENDS TO PROVIDE COLD STORAGE AND DISPATCH SERVICES FOR A NEW PRODUCT THAT THEY DON'T BUY OR SELL (IT IS PACKED AT A DIFFERENT SITE). WHICH STANDARD IS APPLICABLE FOR THIS SERVICE?

The key principle here is that traded products section/module can only apply to products that are purchased and stored on the site prior to sale to the customer.
Therefore:

- if the site purchases these products it could fit within the scope of the Food Standard (possibly with an extension to scope visit if the process is different)
- if the product is not purchased, but is stored onsite then Storage & Distribution would be the correct Standard
- if the product is not stored onsite at all then Agents & Brokers would be applicable

IF A SITE CHOOSES TO INCLUDE TRADED PRODUCTS, IS THE AUDIT DURATION INCREASED?

In Issue 7 of the Standard, this module added approximately 1 hour to the audit duration, depending on the complexity of the operation. It is therefore likely to increase the length of the audit duration slightly.

Auditors have the flexibility to increase/decrease audit duration by 30% so if it is slightly longer this can be accommodated into the audit.

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