

# FOOD SAFETY INSIGHT



Everybody eats... Everybody cares about food safety!



A Publication of Perry Johnson Registrars Food Safety, Inc.



## BRC Issue 6

Since its release in July 2019, BRC Packaging Issue 6 has raised questions – just what is different from Issue 5? Overall, there are six major changes, comprised of four changes to the requirements of the former Issue 5 certification and two changes to protocol.



First and foremost among the changes to requirements is the new integration of specific requirements on corrective and preventive action. Related to root cause analysis, this structured continuous improvement approach emphasizes the importance of addressing issues with the intention of removing recurrence risk. This clause is considered fundamental; sites that have not implemented it cannot be certified.

Also new to Issue 6 is the emphasis on product quality, as BRC for Packaging is not simply a hygiene standard, but one for product safety and quality as well. There is now more emphasis than before on quality in Issue 6, and clear differences between quality and safety are outlined. Hazards are separated into product safety and quality defects in order to improve the control measures required to reduce, prevent, or eliminate each quality hazard to proper levels.

Product safety and quality culture is another new emphasis in Issue 6 with the introduction of a new clause (1.1.2). This clause requires the development and implementation of action plans to improve a site's culture of product safety and quality. Note that it is not the culture itself that will be audited, but the system in place to encourage improvement.

Raw materials management is acknowledged more than ever in Issue 6, with the intention of removing new plastic contamination from the supply chain (particularly regarding the risks of cumulative chemical contamination and the impact upon fish and marine mammals). Section 8 in particular is applicable to the conversion of polymer from pellet, as well as the use of flake or powder and hot melt glues.

(BRC CONT. ON PG 3)

## GFCP Version 3

We Launched in February 2019, BRC Global Standards (BRCGS)'s latest issue of the Gluten-Free Certification Program (GFCP). GFCP is one of the newer offerings in PJRFSI's repertoire of certifications. A standard that applies only to gluten control in manufacturing, processing, and packaging, certified sites and systems will contain between 0-20ppm detectable gluten according to BRCGS. The types of products covered under GFCP includes (but is not limited to): ingredients for use in food manufacturing, cosmetics, drugs, pet foods, and processed foods.

Issue 3 intends to offer increased clarity to both customers and service providers, as well as improved alignment with international regulations, new practical learnings, and detailed guidance regarding oats, the grain supply chain, sampling plans, and analytical testing.



GFCP audits with PJRFSI can serve as a standalone audit or be combined with another certification audit such as SQF, BRC, HACCP, or GMP. After successful completion of the audit and certification is granted, gluten-free brands manufactured in the certified facility are eligible to use the GFCP trademark on product packaging.

To learn more about the requirements and process of Gluten-Free certification through BRCGS and PJRFSI, visit [www.pjrfsi.com](http://www.pjrfsi.com). ♦

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## FDA FSMA Dashboard

Newly released from the FDA, companies looking to comply with the Food Safety Modernization Act (FSMA) have a new place to track compliance and measure progress – a public dashboard. This new tool looks at metrics from three of the seven rules implemented by the nearly decade-old program, and has already shown a five-year low in food recalls. While allergen issues led to a spike in recalls in 2017, recalls related to E. coli or listeria have dropped, indicating that previous doubts in new food regulations' efficacy may have been misplaced.

However, the number of facilities inspected by the FDA has been declining, which may show that the government's ability to follow through with stringent enforcement for the rules may be insufficient. In the meantime, there is extra emphasis on requiring companies to focus on prevention; with such a heavily-layered and nuanced industry as food, the consistent window into the process that the new dashboard offers is undoubtedly beneficial.

To learn more about the FDA's FSMA and FSVP (Foreign Supplier Verification Program) requirements, visit [www.pjrfsi.com](http://www.pjrfsi.com). ♦

## PJRFSI Career Opportunities

- Seeking BRC Auditors in the UK and Pacific Northwest
- Seeking SQF Auditors in the Pacific Northwest

### BRC Auditors:

Seeking hardworking and articulate individuals for BRC subcontract auditing. Minimum of 5 years work experience demonstrating quality assurance and/or food safety functions with relation to food industry manufacturing, retailing, inspection, or enforcement. All candidates must possess a degree in a food or bioscience-related discipline in relation to the Food Sector Category they are qualified in. Qualified candidates must also be a BRC Certified Lead Auditor.

### SQF Auditors:

Seeking hard working and articulate individuals for subcontract SQF auditing. Minimum of 5 years work experience demonstrating operational experience in the food related industry, two of which must be in a technical, professional or supervisory position. All candidates must possess a university degree or higher education considered as equivalent in relation to the Food Sector Category they are qualified. Qualified candidates must also be a SQF Certified Lead Auditor as well as knowledgeable in Reliance Database.



**For immediate consideration please call us today  
or email resume to: [lmaloney@pjrfsi.com](mailto:lmaloney@pjrfsi.com). ♦**

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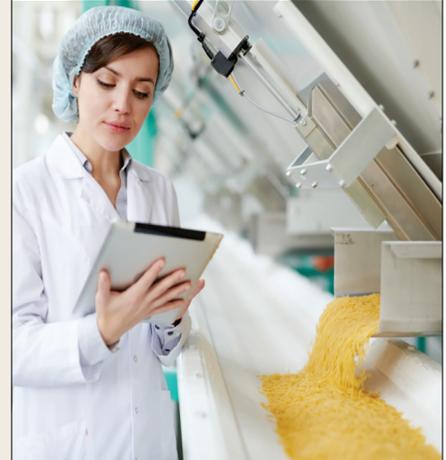


## Client Spotlight: Pasta Garofalo

For over 300 years, Pasta Garofalo has been producing some of the highest-quality durum wheat pasta in the world. Their ongoing quest for the best quality and flavor is reflected in their signature transparent packaging – “as transparent as our conviction that knowing how to make pasta is a centuries-old art” according to their website. Now offering a huge range of products from traditional durum macaroni and spaghetti to whole wheat, gluten free, and organic varieties, the Garofalo philosophy of excellence is reflected in every piece of pasta they produce.

With their sole production facility in Gragnano, Italy – near Naples – Pasta Garofalo currently has FSMA VQIP certification with PJRFSI. “This certification has allowed us to better understand the American legislation and the expectations of customers and authorities of that market,” said Quality Manager, Sergio De Gennaro. “[With certification] we hope to offer better service to American importers and increase market share in [America].” In using PJRFSI for their certification, Garofalo was highly complimentary of the collaborative, constructive approach of auditors and staff in helping the company achieve their goals.

Looking toward the future, Garofalo aims to expand their production plant and increase production capacity to better meet demand while still emphasizing safety and attention to detail. Their long track record of superior quality and service is sure to lead to further success, especially with the help of VQIP certification. To learn more about how FSMA VQIP certification might be of help to your company, or to learn more about our wide range of certification services, visit [www.pjrfsi.com](http://www.pjrfsi.com). ♦



### (BRC CONT. FROM PG 1)

With regard to the protocol changes, the first is the removal of the second hygiene category. Previously, BRC for Packaging included two categories of requirements that depended upon the intended use of the product – either high or basic hygiene. Streamlining the new standard by simplifying the system, the categories are replaced by a risk-based approach with just one set of requirements. (So-called “food contact materials” may have slightly greater requirements.)

In Issue 6, the option to elect a split unannounced audit will be removed. Not only does this help streamline and make the new issue more uniform, but it brings the BRC Packaging standard in line with Issue 8 of the Food Standard as well.



The impacts of the changes in Issue 6 may vary between operations, but PJRFSI is dedicated to helping ensure a smooth and stress-free transition for all clients. If you have questions about what the new issue means for your organization or if you'd like to learn more about BRC programs in general, visit [www.pjrfsi.com](http://www.pjrfsi.com). ♦

## Tradeshows & Events

### Southeast Regional Fruit & Vegetable Conference

January 9-12, 2020  
Savannah, Georgia



### Texas Hemp Convention

January 28-30, 2020  
Dallas, Texas



### USA\* CBD Expo

February 13-15, 2020  
Las Vegas, Nevada



### GFSI Conference

February 25-28, 2020  
Seattle, Washington



## Cannabis Logo & Usage

To accompany PJRFSI's new Cannabis Safety Certification offerings, we are pleased to present a logo for use on certified organizations' products and/or packaging! To learn more about our cannabis programs as well as further details on use of our new logo, please visit [www.pjrfsi.com](http://www.pjrfsi.com). ♦



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## Upcoming FREE Webinars From PJRFSI

PJRFSI is hosting a series of free, educational webinars in the coming weeks and months. Check out what's coming up below! Go to our website [www.pjrfsi.com](http://www.pjrfsi.com) now to register.

### Friday, January 10, 2020

"Cannabis GAP: How Safe is Your Growing Business?"

### Friday, March 20, 2020

"Cannabis GMP for Retailers:  
How to Safely Grow Your Cannabis Business!"



In the event you cannot attend a webinar at its scheduled time, we have the recordings available to download from our website at [www.pjrfsi.com/webinars/past-webinars](http://www.pjrfsi.com/webinars/past-webinars). We currently have the following webinars available for download:

- 8/16/2019 –  
Gluten-Free Certification Program Issue 3
- 4/26/2019 –  
Cannabis Certification
- 3/18/2019 –  
FSMA: FSVP and VQIP

Keep checking back to our website for newly added webinar dates. ♦