
**BRCGS Top 10 Auditor
Nonconformances –
Food Safety
Issue 9 (2023) &
Packaging Issue 6 (2022-2023)**

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PJRFSI

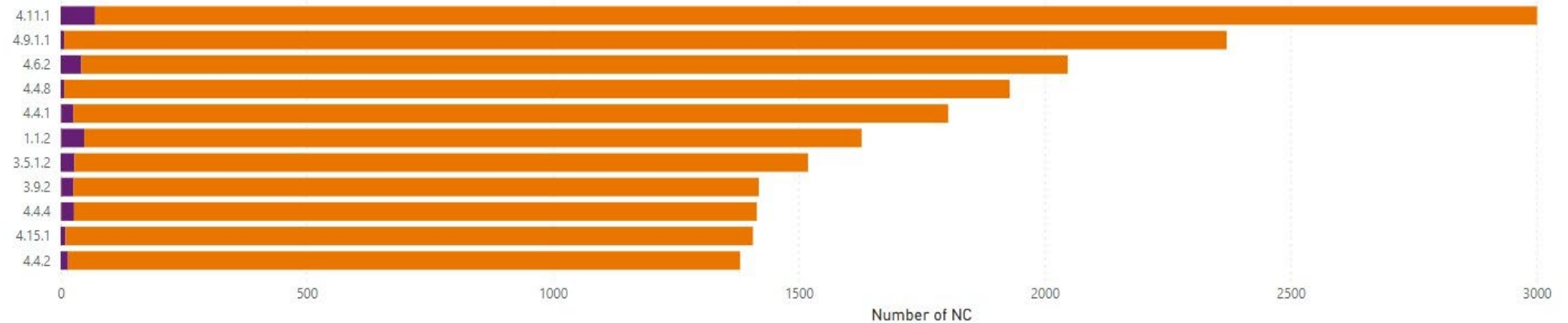


BRCGS Top 10 Auditor Nonconformances – Food Safety Issue 9 (2023)

Horizon Basic for CBs

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Severity ● Critical ● Fundamental ● Major ● Minor



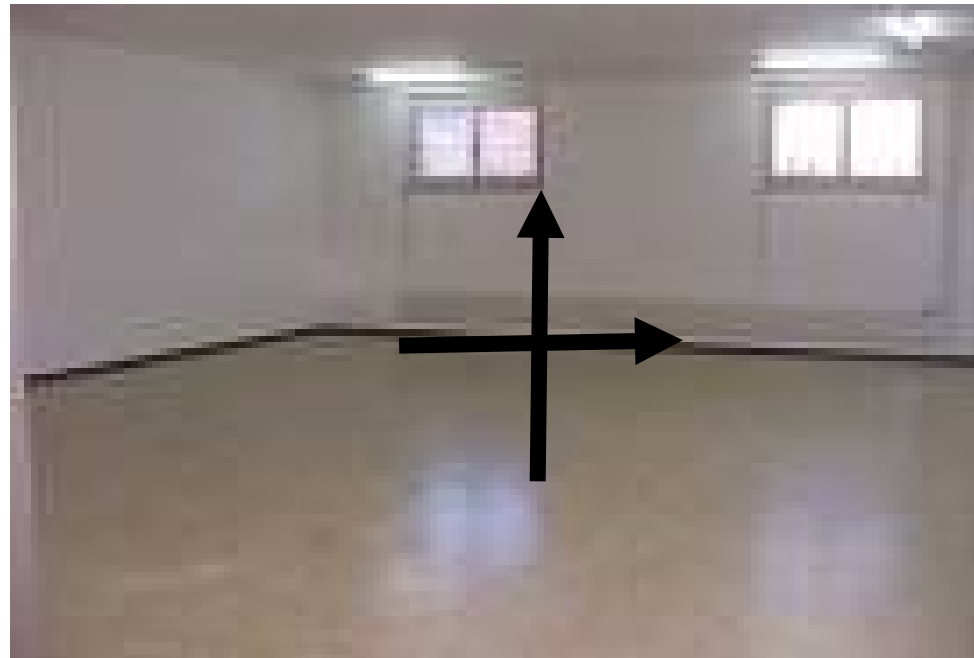
Clause Critical Fundamental Major Minor

4.11.1			70	2931
4.9.1.1			7	2363
4.6.2			42	2005
4.4.8			7	1922
4.4.1	1		25	1778
1.1.2	1		47	1580
3.5.1.2			28	1491
3.9.2	1		25	1393
4.4.4	1		26	1388
4.15.1			10	1397
4.4.2			15	1366

#1: 4.11.1; The premises and equipment shall be maintained in a clean and hygienic condition.

- **2931 Minors, 70 Majors**

What is provided to the auditor – **The Presidents Tour!**
6 feet wide, 6 feet high



What is the auditor looking for – checking the perimeters for debris and dirt



#2: Clause 4.9.1.1; Processes shall be in place to manage the use, storage and handling of non-food chemicals to prevent chemical contamination

2363 Minors, 7 majors

These shall include, at a minimum:

- **an approved list of chemicals for purchase**
- **availability of material safety data sheets and specifications**
- **confirmation of suitability for use in a food-processing environment**
- avoidance of strongly scented products
- **the labelling and/or identification of containers of chemicals at all times**
- **a designated storage area (separate from chemicals used as raw materials in products) with access restricted to authorized personnel**
- use by trained personnel only
- procedures to manage any spills
- procedures for the safe, legal disposal or return of obsolete or out-of-date chemicals and
- empty chemical containers

Separate Food vs Non-Food Grade Chemicals

Locked
Proper
Storage



Properly
Labeled with
SDS



#3: Clause 4.6.2; The design and construction of equipment shall be based on risk, to prevent product contamination. For example, the use of the correct seals, impervious surfaces or smooth welds and joints, where they are exposed to product and could otherwise result in foreign body, microbiological or allergen contamination of the product

2005 Minors, 42 Majors

No Black Steel or painted equipment



**Frayed conveyor belting –
where did go?**



#4: Clause 4.4.8; Doors (both internal and external) shall be maintained in good condition. At a minimum:

1922 Minors, 7 Majors

- external doors and dock levelers shall be close fitting or adequately proofed
- external doors to open product areas shall not be opened during production periods except in emergencies
- where external doors to enclosed product areas are opened, suitable precautions shall be taken to prevent pest ingress.
- **Remember: a mouse will go through a hole the size of a pencil and a rat will go through a hole the size of a quarter!**

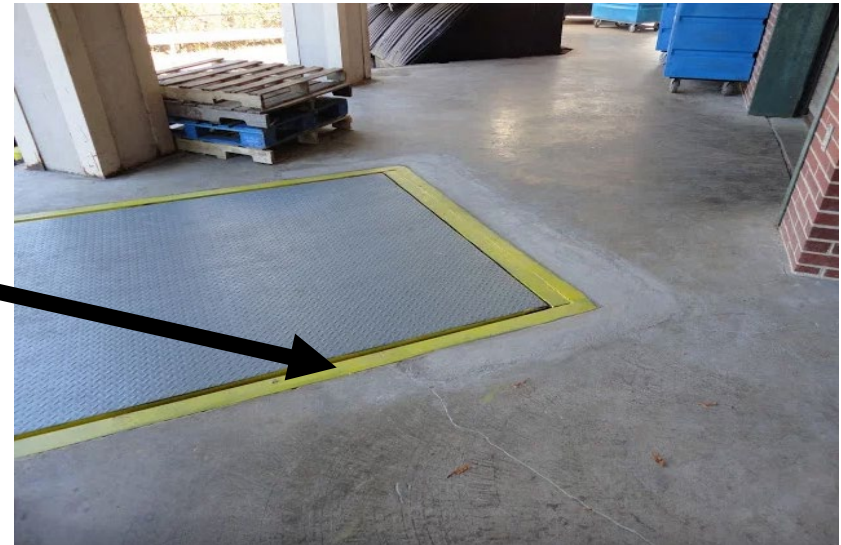


If you can see daylight, you have a problem



Damaged or missing pads

Missing or damaged brushes allowing pest entry



#5: Clause 4.4.1; Walls shall be finished and maintained to prevent the accumulation of dirt, minimize condensation and mold growth, and facilitate cleaning

1776 Minors, 25 Majors, 1 Critical

Flaking Paint



Mouldy Wall & Ceiling



Cracks in wall surface



#6: Clause 1.1.2; The site's senior management shall define and maintain a clear plan for the development and continuing improvement of a food safety and quality culture. The plan shall include measures needed to achieve a positive culture change.

1580 Minors; 47 Majors, 1 Critical

This **shall** include:

- defined activities involving all sections of the site that have an impact on product safety. As a minimum, these activities **shall** be designed around:
- clear and open communication on product safety (**HOW?**)
- training
- feedback from employees (**HOW is this provided?**)
- the behaviors required to maintain and improve product safety processes
- performance measurement of activities related to the safety, authenticity, legality and quality of products (**HOW**)
- an action plan indicating how the activities will be undertaken and measured, and the intended timescales (**HOW**)
- a review of the effectiveness of completed activities. (**HOW & WHEN**)

The plan shall be **reviewed and updated at least annually**, at a minimum.

#7: Clause 3.5.1.2; The company shall have a documented supplier approval procedure to ensure that all suppliers of raw materials, including primary packaging, effectively manage risks to raw material quality and safety and are operating effective traceability processes.

1491 Minors; 28 Majors

- Suppliers not on Approved Supplier List
- Supplier Approval Documentation missing
- Supplier GFSI Certificate is expired.
- Low risk supplier has not completed questionnaire
- Low risk supplier questionnaire has not been reviewed or renewed every 3 years.

#8: Clause 3.9.2; Identification of raw materials (including **primary packaging**), intermediate/semi-processed products, part-used materials, finished products and materials pending investigation shall be adequate to ensure traceability

1393 Minors; 25 Majors, 1 Critical

- Primary Food Contact Material must be traceable.
- Work in-process/rework must be traceable.
- Minor ingredients must be traceable
- Bulk product (silos) must be able to be traced

#9: Clause 4.4.4; Ceilings and overheads shall be constructed, finished and maintained to prevent the risk of product contamination.

1366 Minors; 26 Majors, 1 Critical

- No overhead dust, flaking paint, leaks, condensation that can result in product contamination or contamination of the surrounding environment leading to product contamination



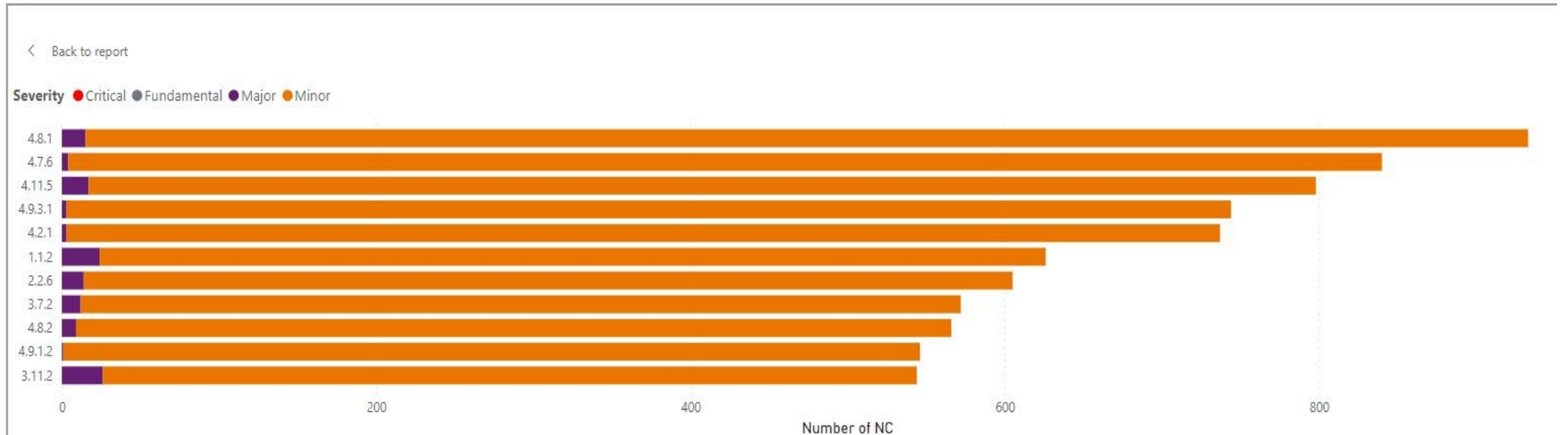
#10: Clause 4.15.1; Procedures to maintain product safety and quality during storage shall be developed on the basis of risk assessment, understood by relevant staff and implemented accordingly.

1397 Minors; 10 Majors,

- managing chilled and frozen product transfer between temperature-controlled areas
- segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergens) or taint uptake (**Chemicals stored with food products, allergen materials stored above non-allergen materials, chilled or frozen product stored under leaking cooling unit**)
- storing materials off the floor and away from walls (**No boxes or bags sitting on floor**)
- specific handling or stacking requirements to prevent product damage (**Stacking 2 or 3 high crushes product on bottom pallet**)

BRCGS Top 10 Auditor Nonconformances – Packaging Safety Issue 6 (2022-2023)

Horizon Basic for CBs



Clause	Critical	Fundamental	Major	Minor
4.8.1			15	918
4.7.6			4	836
4.11.5			17	781
4.9.3.1			3	741
4.2.1			3	734
1.1.2			24	602
2.2.6			14	591
3.7.2			12	560
4.8.2			9	557
4.9.1.2			1	545
3.11.2			26	518

#1: 4.8.1; Good standards of housekeeping shall be maintained, which shall include a condition-based cleaning or 'clean as you go' policy.

- **918 Minors; 15 Majors**



#2: 4.7.6; Temporary repairs/modifications using **tape, cardboard, etc.** shall only be permitted in emergencies and where product contamination is not at risk. Such modifications **shall be subject to a time limit and shall be recorded and scheduled for correction.**

- **836 Minors; 4 Majors**

- Date temporary repairs and document for follow-up



#3: 4.11.5; Effective precautions shall be in place to prevent pests entering the premises. The building shall be suitably proofed against the entry of all pests via doors, windows, ducts and cable entry points. This shall include measures to prevent birds and flying mammals from entering buildings or roosting above loading or unloading areas.

- **781 Minors; 417 Majors**



If you can see daylight, you have a problem

#4: 4.9.3.1; Processes shall be in place to manage the use, storage and handling of non-production chemicals, to prevent chemical contamination.

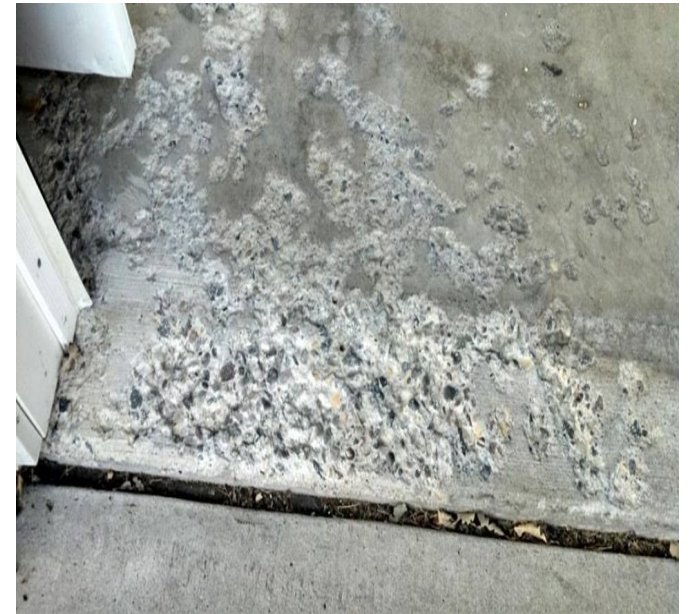
- **741 Minors; 3 Majors**

These shall include, as a minimum:

- a list of approved chemicals for purchase
- availability of material safety data sheets and specifications
- avoidance of strongly scented products
- the labelling and/or identification of containers of chemicals at all times
- designated storage area with access restricted to authorized personnel
- used by trained personnel only

#5: 4.2.1; Walls, floors, ceilings and pipework shall be maintained in good condition and shall facilitate cleaning.

- **734 Minors; 3 Majors**



#6: 1.1.2; The site's senior management shall define and maintain a clear and effective plan for the development and continual improvement of a product safety and quality culture.

- **602 Minors; 24 Majors**

This shall include:

- defined activities involving all sections of the site that have an impact on product safety and quality
- a description of how the activities will be undertaken and measured, and the intended timescales
- a review of the effectiveness of completed and ongoing activities.

#7: 2.2.6; The HARA team shall identify and record all potential product safety hazards that are reasonably expected to occur at each step in relation to the product and process

- **591 Minors; 14 Majors**

- microbiological hazards, chemical contamination (e.g. taint, odor, allergen, component transfer from inks, varnishes and glues), foreign objects
- potential for unintended migration of substances from the packaging material into food or other hygiene-sensitive products
- potential problems arising from the use of recycled materials • foreseeable misuse by the consumer
- defects critical to consumer safety
- hazards that may have an impact on the functional integrity and performance of the final product in use
- potential for malicious intervention & potential for raw material fraud

#8: 3.7.2; The Supplier Approval Procedure shall be based on risk

- **560 Minors; 12 Majors**

- Suppliers not on Approved Supplier List
- Supplier Approval Documentation missing
- Supplier GFSI Certificate is expired.
- Low risk supplier has not completed questionnaire
- Low risk supplier questionnaire has not been reviewed or renewed every 3 years
- No valid risk-based justification is provided

#9: 4.8.2; Documented cleaning procedures shall be in place and maintained for buildings, equipment and vehicles.

- **557 Minors; 9 Majors**

- The frequency and methods of cleaning **shall be based on risk**
- responsibility for cleaning
- item/area to be cleaned
- frequency of cleaning
- method of cleaning
- cleaning materials to be used
- cleaning record and responsibility for verification

#10: 4.9.1.2; Glass or brittle plastics (other than the product) that pose a potential product contamination hazard shall be controlled and recorded on a register that includes, as a minimum:

- **545 Minors; 1 Major**

- a list of items detailing location, number, type and condition
- recorded checks of condition of items, carried out at a specified frequency that is based on the level of risk to the product
- details on cleaning or replacing items to minimize the potential for product contamination.
- Glass or brittle plastics **not** in the production or storage areas shall be included in the register on the basis of risk (Shipping/Receiving office, coffee pots?).

QUESTIONS?