BRC Global Standard for Food Safety Issue 7
What are the major changes?

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Objectives

- Understand the reasons for changes to the standard
- Make participants aware of the major changes to the requirements of the standard in Issue 7

Important Changes

- Full chain traceability
- Tackling fraud
- Ambient products included in high-care
- Labelling and pack control
- Reduce multiple audits and meet customer requirements
- Improvement of grading
- Visibility where agents and brokers are used

Site Vs Company

Structure and format remains similar to issue 6

Site- Location being audited

Company- whole company; may include other locations such as corporate office

Fundamental Clauses

Now 12 from 10 (in Issue 6)

1.1 Senior management commitment and continual improvement

2.0 Food Safety Plan

3.4 Internal Audit

3.5.1 Management of suppliers of raw materials and packaging – New!

3.7 Corrective action

3.9 Traceability

4.3Layout product flow and segregation

4.11 House keeping and hygiene

5.3 Management of allergens

6.1 Control of operations

6.2 Labeling and pack control-New!

7.1 Training

Changes to Section 1 Requirements

1.1.2 Food Safety and Quality objectives

(Objectives set to achieve goals relating to product safety and quality; Communicated to relevant staff; Allocation of budgets and resources for these).

1.1.6 Technical Knowledge and information

The company must be able to demonstrate that it maintains up to date knowledge of relevant legislation, scientific and technical developments and new risks to authenticity of raw materials and industry codes of practice.

1.1.7 Availability of a copy of the standard

The site shall have a genuine, original hard copy or electronic version of the current standard available and be aware of the changes to the standard or protocol that are published on the BRC website

Changes to Section 2 Requirements

2.0 The Food Safety Plan

2.1.2- The scope of each HACCP plan, including the products and processes covered, shall be defined.

2.3.2- HACCP based on comprehensive information sources, which are referenced and available on request.

2.4.1- Use and alternative use of the product.

2.14.1- HACCP to be reviewed after a recall or new scientific development.

Changes to Section 3 Requirements

3.4 Internal Audits

3.4.1- Scheduled program throughout the year

Changes to Section 3 Requirements

Supplier Approval- Changes

- Fundamental requirement
- All three clauses revised
- New requirement for products supplied by Agents and Brokers

Changes to Section 3 Requirements

3.5.1.1 Risk Assessment

- Documented risk assessment of each raw material or group of raw materials, including packaging to identify potential risks to product safety, legality. This shall take into account the potential for
  - Allergen contamination
  - Foreign body risks
  - Microbiological contamination
  - Chemical contamination
  - Substitution or fraud (see clause 5.4.2)

The risk assessment shall be reviewed annually.

Changes to Section 3 Requirements

3.5.1.3 Purchasing from Agents and Brokers

- The site must obtain sufficient information to enable the approval of the last processor of the raw material
- Information to come from the manufacturer, processor, packer or through the agent/broker
- If the agent/broker are certificated to a GFSI approved standard this will demonstrate compliance to this clause

Changes to Section 3 Requirements

3.5.1.4 Exception Procedure

- Exceptions include bulk commodity purchases, emergency supplies or customer directed purchases
- Where not possible to operate the approval processes in 3.5.1.3
- Procedure to detail how exceptions are handled, to include checks and tests on products

Changes to Section 3 Requirements

3.7 Corrective Action -This clause has now been split into 2 clauses, but the intent is the same

3.9.2 Tests of Traceability System - The site shall test the traceability system across the range of product groups to ensure traceability can be determined from raw material including primary packaging to finished product and vice versa. This shall occur at a pre-determined frequency, as a minimum annually, and results shall be retained for inspection. Full traceability should be achieved within 4 hrs.

Changes to Section 3 Requirements

3.10.2 Complaint handling (Complaint data shall be analyzed for significant trends. Where there has been a significant increase in a complaint or a serious complaint root cause analysis shall be used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff).

3.12 Customer focus and communication

Two new requirements

- Implementation of customer specific policies, codes of practice
- Ensuring contractors and/or suppliers are aware of/adhere to customer policies where applicable

Changes to Section 4 Requirements

4.2.3 (New) External Storage

External storage tanks, silos and any intake pipes with an external opening shall be locked.

4.3.2 The Site map shall define,

- Access points for personnel
- Access points for RM including packaging
- Routes of movement for personnel
- Routes of movement for raw materials
- Routes for removal of waste
- Routes for movement of rework
- Location of any staff facilities including changing rooms, toilets, canteens and smoking area
- Production process flow

Changes to Section 4 Requirements

Product Risk Zones- Changes (4.8.4 and 4.8.5)

Revised high risk and high care definitions

- Dedicated footwear shall be provided to be worn in the high risk and with an effective system to segregate areas for wearing high risk and other footwear. By exception use of boot-wash facility is accepted where these demonstrably provide effective control of footwear to prevent the reduction of pathogens.

Changes to Section 4 Requirements

Ambient High Care (Clause 4.3.7)

- Environment designed to minimize product contamination
- A raw material is prone to contamination with a vegetative pathogen
- Production process includes a process step which removes or reduces the pathogen
- Finished products are stored at ambient temperature
- Final product is ready to eat or heat
- Finished products are such that vegetative pathogens could survive and grow in normal use, subsequently causing food poisoning, or are of a nature that enables food poisoning to result from a very low level of contamination.

Changes to Section 4 Requirements

4.7.5 (New)Maintenance in High Risk and High Care areas

Maintenance activities undertaken in these areas shall respect the segregation requirements. Wherever possible tools and equipment shall be dedicated.

4.7.6 Use of food grade materials

Materials used for equipment and plant maintenance and that pose a risk by direct or indirect contact with raw materials, intermediate and finished products, such as lubricating oil, shall be food grade and of a known allergen status.

Changes to Section 4 Requirements

4.10.3.4 Metal detector checking procedure

- Previously 4.10.3.5
- Metal detector checking procedure shall be based on good practice (previously best practice)
- Use of test pieces incorporating a sphere of a metal of known diameter selected on the basis of risk.

Changes to Section 4 Requirements

4.13 Management of surplus food and products for animal feed (New!)

- Ensure brand owners prior consent for disposal of labelled products
- Ensures procedures in place to ensure products are fit for consumption
- Controls on food going for animal feed

Changes to Section 4 Requirements

4.14 Pest Control

- Two new clauses; 4.14.1 (recording and managing pest activity); 4.14.11 (employee responsibility to report)

- 4.14.9- Pest control survey shall be undertaken at a frequency based on risk but as a minimum annually.

Changes to Section 5 Requirements

5.2 Product Labelling- New!

5.2.2 There shall be effective process in place to ensure that labelling information is reviewed whenever changes occur to- Product scope, raw materials, supplier of raw materials, country of origin of materials, legislation)

5.2.4 Where the label information is the responsibility of a customer or a nominated third party the company shall provide

- Information to enable the label to be accurately created
- Information whenever changes occur which may affect the label information

Changes to Section 5 Requirements

5.3 Allergens (previously 5.2)

Fundamental SOI: The site shall have a system for the management of allergenic materials which minimizes the risk of allergen contamination of products and meets legal requirements for labelling in the country of sale.

5.2.7-Where a claim is made regarding the suitability of a food for allergy or food sensitivity sufferers the site shall ensure that the production process is fully validated to meet the stated claim and the effectiveness of the process is routinely verified.

Changes to Section 5 Requirements

5.4 Product authenticity, claims and chain of custody

5.4.1- Access information on historical and developing threats- New!

5.4.2-Vulnerability assessment- New!

5.4.3- Assurance and/or testing- New!

5.4.4- Claims to be verified

5.4.5- Certification status for methods of production- New!

5.4.6- Controls to protect integrity of product claims- New!

Changes to Section 5 Requirements

5.6.1.2-Reviewing test results-

Tests and inspection results shall be recorded and reviewed regularly to identify trends. The significance of external laboratory results shall be understood and acted upon accordingly. Appropriate action shall be implemented promptly to address any unsatisfactory results or trends.

Changes to Section 6 Requirements

Labelling and Pack control

- New Fundamental section: Labelling and pack control.
- Detailed requirements to manage product changeover

Changes to Section 6 Requirements

6.4.3 Reference equipment

Reference measuring equipment shall be calibrated and traceable to a recognized national or international standard and records maintained. The uncertainty of calibration shall be considered when equipment is used to assess critical limits.

Changes to Section 7 Requirements

Personnel

7.1.1 Agency supplied staff refers to staff supplied by an employment agency

7.3.1 The site shall make employees aware of the symptoms of infection, disease or condition which would prevent a person working with open food.

7.3.2 Visitors and contractors shall be made aware of the type of symptoms, infection, disease or condition which would prevent a person visiting areas with open food. Where permitted by law , visitors shall be required to complete a health questionnaire.

Questions?