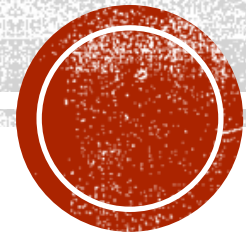


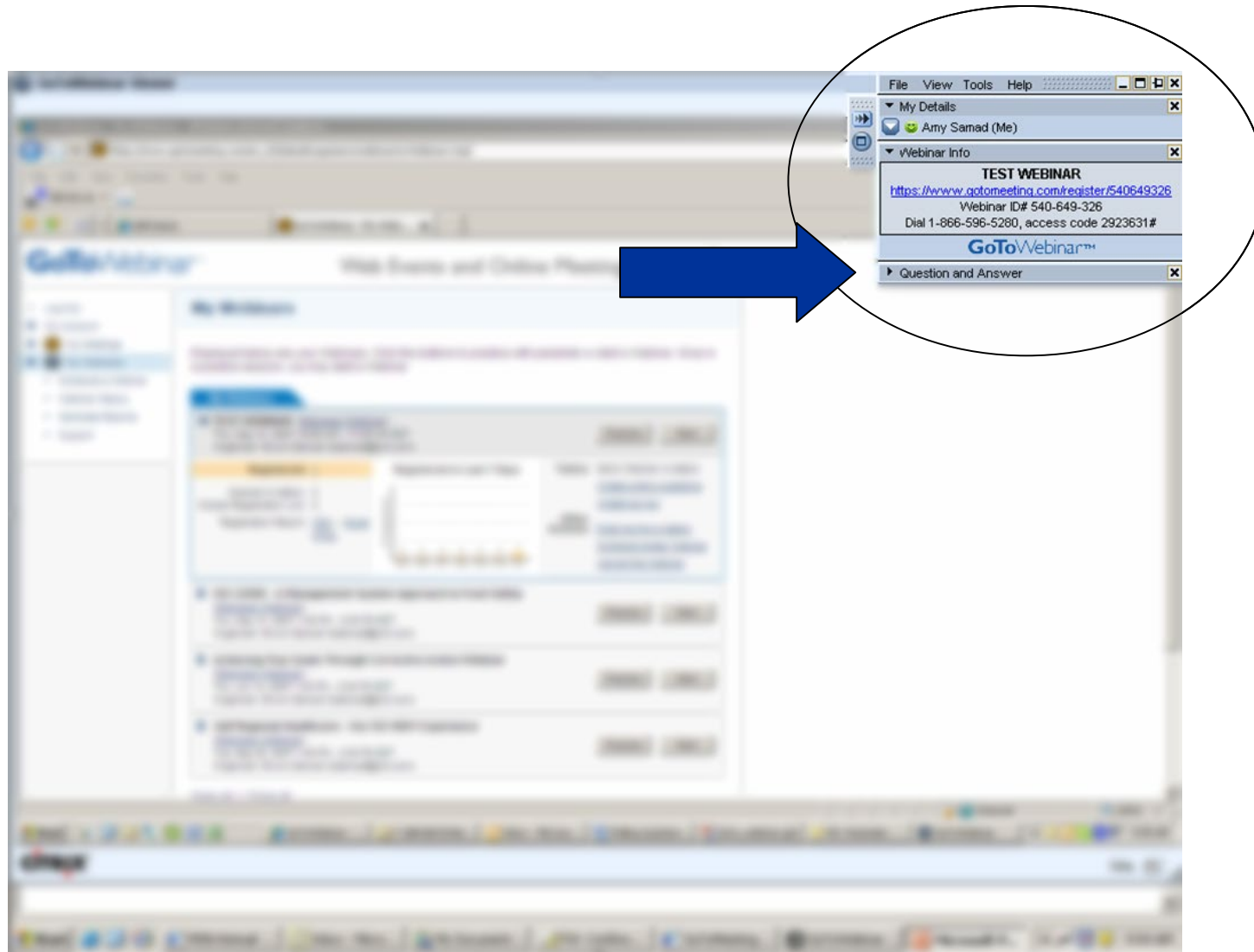


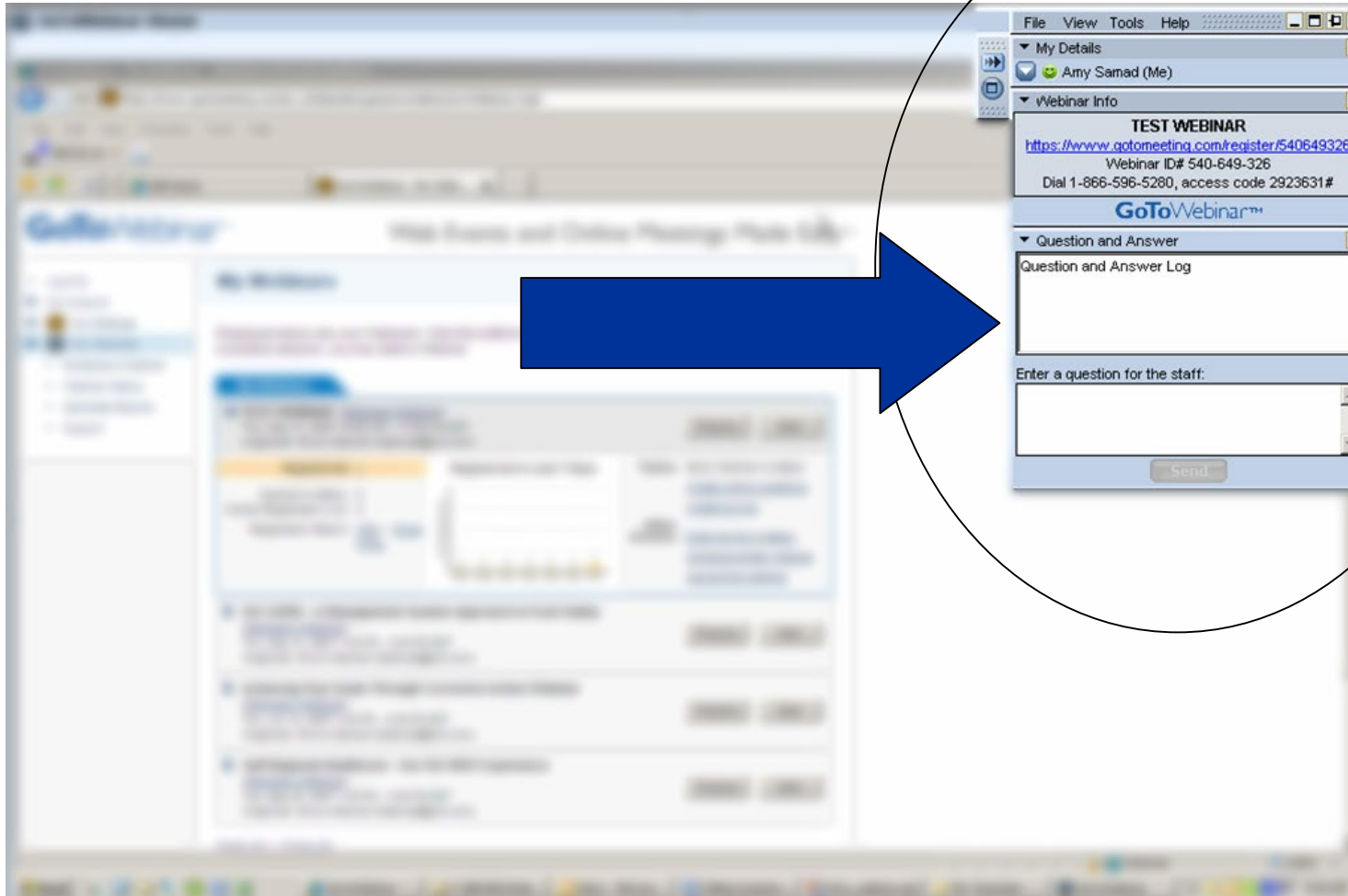
BRCS

BRCS — **PITFALLS & COMMON** **NONCONFORMANCES**

PJRFSI – Partner for Food Safety







PJRFSI – Partner for Food Safety

Paul McPhee

BRCGS Technical Manager, PJRFSI





BRCS Food Safety Issue 9 Update

Paul McPhee
August 4, 2022

BRCGS Issue 9 Timelines

- BRCGS Food Safety Issue 9 – **Launched August 1, 2022**
- Can be obtained through BRCGS Participate for Certificated sites or through BRCGS Store
- Auditor training to commence November 2022
- Auditing to Issue 9 will start **February 1st, 2023**

Major Changes to BRCGS Issue 9 – Section 1

SOI - The site's senior management shall demonstrate they are fully committed to the implementation of the requirements of the Global Standard for Food Safety and to processes which facilitate continual improvement of food safety, quality management and the site's food safety and quality culture.

The word “**integrity**” has been changed to “**authentic or authenticity**” throughout standard

Clause 1.1.1

- Need to include commitment to improve the site's **food safety and quality culture** in quality policy

Clause 1.1.2

- The a food safety and quality culture plan **shall also include behaviours** needed to achieve the intended positive culture change.
- The plan shall be reviewed and updated, **at least annually at a minimum.**

Clause 1.1.3 - Objectives

- Objectives monitored and results reported at least quarterly to site senior management **and all staff**

Major Changes to BRCGS Issue 9

Clause 1.1.4

- Annual Senior Management meeting need to the evaluate the :effectiveness of the systems for HACCP, food defence and authenticity, **food safety and quality culture plan (added to clause)**

Clause 1.1.5

- Removed from clause: ~~Employees shall be aware of the need to report any evidence of unsafe or out-of-specification product or raw materials, to a designated manager to enable the resolution of issues requiring immediate action.~~

Clause 1.1.11

Added the following to clause: **Site's senior manager shall be available during the audit for a discussion on effective implementation of the food safety and quality culture plan.**

Major Changes to BRCGS Issue 9

There are 2 new clauses in Section 1.2

Clause 1.2.3: Employees shall be aware of the need to report any evidence of unsafe or out-of-specification product or raw materials, to a designated manager to enable the resolution of issues requiring immediate action.

Clause 1.2.4: In the event of the site not having the appropriate in-house food safety, authenticity, legality or quality knowledge, external expertise (e.g. food safety consultants) may be used, but day-to-day management of the food safety systems shall remain the responsibility of the company

Major Changes to BRCGS Issue 9 – Section 2

General: Modified wording in several clauses to clarify what is required referencing another section of the Standard

Clause 2.3.2 has been expanded to include all site maps including zoning, water distribution equipment layout

Clause 2.6.1: expanded requirement that flow diagram be reviewed for accuracy **whenever there are changes which may affect food safety.**

Clause 2.7.4 (New): Where the control of a food safety hazard is achieved through prerequisite programmes (refer to section 2.2) or controls other than CCPs (refer to clause 2.8.1), this shall be stated and the adequacy of the programme to control the specific hazard validated.

Major Changes to BRCGS Issue 9

Clause 2.12.1 (New): HACCP or food safety plans shall be validated before implementation or prior to any changes which may affect product safety, to ensure that the plan will effectively control the identified hazards.

For existing HACCP or food safety plans this may be achieved using the established processes detailed in clauses 2.12.2 and 2.12.3

General: Issue 8 clause 2.12.1 become 2.12.2

Clause 2.14.1 is deleted and becomes 2.12.3

Major Changes to BRCGS Issue 9 – Section 3

General: Modified wording in several clauses to clarify what is required referencing another section of the Standard

Clause 3.4.1: Specific wording added concerning “**food safety and quality culture plan & assessment of the site’s conformity with their food safety and quality management systems.**”

Clause 3.4.4: Expanded to include

- The results shall be reported to the personnel responsible for the activity or area audited.
- Corrective actions, and timescales for their implementation, shall be agreed and their completion verified.
- As a minimum a summary of the results shall be reviewed in the management review meetings (see clause 1.1.4).

Major Changes to BRCGS Issue 9 – Section 3

Clause 3.5.2

Requirements for vendor approval have been expanded to include verification of **product security and food defence plan, product authenticity**, through audits or your supplier questionnaire.

Clause 3.5.3.1: now includes “**product safety consultants**”

Clause 3.5.3.3 (New): There shall be a documented process for ongoing performance review of suppliers of services, based on risk and defined performance criteria. The **process shall be fully implemented**. Records of these reviews will be kept.

Clause 3.5.4: Management of Outsourced Processing

Major changes to this section if applicable to your site; 2 new clause 3.5.4.3 & 3.5.4.4;
Issue 8 clauses renumbered as **3.5.4.5 & 3.5.4.6**

Major Changes to BRCGS Issue 9 – Section 3

Section 3.7 SOI has been modified to include “(e.g. non-conforming products, internal audits, complaints, product recalls, product testing, second- and third-party audits and online reviews)” for further clarification

Clause 3.7.2: rewritten to provide more clarification of requirements and now includes the following: Root cause analysis shall also be used to prevent recurrence of non-conformities and to implement ongoing improvements when analysis of non-conformities for trends shows there has been a significant increase in a type of non-conformity.

Clause 3.7.3 covering root cause has been deleted.

Clause 3.11.4: Expanded to include “The company shall provide sufficient information to enable the certification body to assess any effects of the incident on the ongoing validity of the current certificate (as detailed in the audit protocol, Part III, section 7.1). As a minimum, this will include corrective action, root cause analysis and a preventive action plan. “

Major Changes to BRCGS Issue 9 – Section 4

Section 4.1 : Renamed as “External standards and site security”

Clause 4.1.4 (New):

- Policies and systems shall be in place to ensure that access to the site by employees, contractors and visitors is controlled. A visitor recording system shall be in place.
- Contractors and visitors, including drivers, shall be made aware of the procedures for access to the site.
- Only authorised personnel have access to production and storage areas. Contractors working in product processing or storage areas shall be the responsibility of a nominated person.
- Staff shall be trained in site security procedures.

Major Changes to BRCGS Issue 9 – Section 4

Section 4.2 : Renamed as “Food Defense”

Clause 4.2.1 (New):

- Where personnel are engaged in threat assessments and food defence plans, the individual or team responsible shall understand potential food defence risks at the site. This shall include knowledge of both the site and the principles of food defence.
- Where there is a legal requirement for specific training, this shall be in place

Renumbering of clauses is required in this section if referring to BRCGS Clauses

Section 4.3: Renumbering of clauses required

Clause 4.3.1 (New)

- The site shall assess the production risk zones required for the products manufactured, processed or packed at the site, using the definitions in appendix 2 of the Standard

Major Changes to BRCGS Issue 9 – Section 4

Clause 4.4.11 (New):

- Where plastic strip curtains are present, these shall be maintained in good condition to prevent pest ingress.

Section 4.6: Equipment

This section has been totally rewritten and now has 7 clauses instead of 2 clauses

Clause 4.9.1.1 Chemical Control: Modified to include

- procedures to manage any spills
- procedures for the safe, legal disposal or return, of obsolete or out-of-date chemicals and empty chemical containers

4.9.5 Wood: modified to include:

- Wood used for food contact purposes shall be fit for purpose (e.g. free from damage or splinters, free from taint, and wood treatments where used, are only used in accordance with legislation and approved for food use).

Major Changes to BRCGS Issue 9 – Section 4

Clause 4.9.6.2: Rewritten as follows:

- Pens and similar portable items used in open product areas shall be controlled by the site to minimise the risk of physical contamination (e.g. excluding non-approved items, restricting use to site issued equipment, pens designed without small external parts and detectable by foreign-body detection equipment or use in designated areas where contamination is prevented).

Clause 4.9.6.3 (New):

- Based on risk, procedures shall be implemented to minimise other types of foreign-body contamination (i.e. types of contamination that are different from those detailed in section 4.9). (Note Risk assessment required to be on file)

Clause 4.10.3 (New): related to X-ray: Very detailed requirements,. Please review if you have X-ray, otherwise not applicable

Major Changes to BRCGS Issue 9 – Section 4

4.10.7.1 (New): Other foreign-body detection and removal equipment

- Other foreign-body detection and removal equipment, such as gravity separation, fluid bed technology or aspirators, shall be checked in accordance with the manufacturer's instructions or recommendations.
- Checks shall be documented

Clause 4.11.7 – CIP: Requirements have been expanded

Clause 4.11.8 – Environmental Monitoring:

Clause 4.12.3 (New)

- Waste disposal from open product areas shall be managed to ensure that it does not compromise product safety

Major Changes to BRCGS Issue 9 – Section 4

Clause 4.13.2: Modified

- Processes shall be in place to ensure that all products (own-branded and customer-branded) which are sold to staff or passed on to charities or other organisations are fit for consumption, and meet legal requirements and maintain traceability

Clause 4.16.6: 3rd Party distribution Contractors: clause totally rewritten & expanded.

Please review your procedure to ensure compliance!

Major Changes to BRCGS Issue 9 – Section 5

Clause 5.2.1: Product Labeling – added the following:

- The company shall have a procedure for artwork approval and sign-off .

Clause 5.3 Management of Allergens

Now **applies to** “Pet food and animal feed manufacturers certificated to the Standard 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/animal feed, this section of the Standard may be considered as ‘not applicable’ for pet food or animal feed destined for those countries. “

Section makes extensive reference to “Cross Contamination” in several clauses

Major Changes to BRCGS Issue 9 – Section 5

Section 5.4 Authenticity

One New clause so need renumber all clauses

Clause 5.4.1 (New)

- Where personnel are engaged in vulnerability assessments, the individual or team responsible shall understand potential food fraud risks. This shall include knowledge of raw materials used by the site and the principles of vulnerability assessment (Training requirement?)

Clause 5.4.3: Modified to include that the plan will be reviewed annually or: whenever there is:

- a change in raw material or a supplier of raw materials
- emergence of a new risk (e.g. known adulteration of an ingredient or developments in scientific information associated with authenticity of the site's products or raw materials, for example, information obtained as part of clause 1.1.8) following a significant product safety incident (e.g. a product recall) where the authenticity of the site's products or raw materials is implicated

Major Changes to BRCGS Issue 9 – Section 5

Clause 5.4.4 renumbered to 5.4.5 and includes the following:

- The site shall undertake documented mass balance tests at a frequency to meet the particular scheme requirements **of any scheme they are certificated to**, or at least every 6 months in the absence of a scheme-specific requirement, **at least one mass balance test every 6 months**

Clause 5.4.6 renumbered to 5.4.7 and includes the following:

- **Where a product is designed to enable a claim to be made, the company shall ensure that the product formulation and the production process are fully validated to meet the stated claim and any legal requirements (in the country of intended sale) relating to the claim**

Major Changes to BRCGS Issue 9 – Section 5

Clause 5.4.4 renumbered to 5.4.5 and includes the following:

- The site shall undertake documented mass balance tests at a frequency to meet the particular scheme requirements **of any scheme they are certificated to**, or at least every 6 months in the absence of a scheme-specific requirement, **at least one mass balance test every 6 months**

Clause 5.4.6 renumbered to 5.4.7 and includes the following:

- **Where a product is designed to enable a claim to be made, the company shall ensure that the product formulation and the production process are fully validated to meet the stated claim and any legal requirements (in the country of intended sale) relating to the claim**

Major Changes to BRCGS Issue 9 – Section 5

Clause 5.5.1: Modified as follows:

- When purchasing or specifying primary packaging, the supplier of packaging materials shall be made aware of any particular characteristics of the food **or existing packaging (e.g. high fat content, pH, usage conditions such as microwaving, other packaging used on the product, use of recyclable or reusable packaging materials)** which may affect packaging suitability.
- **Certificates of conformity or other evidence shall be available for primary packaging to confirm it complies with applicable food safety legislation and is suitable for its intended use.**

Section 5.6 Testing: There are now **7** clauses in section that cover all aspects of product testing.

Major Changes to BRCGS Issue 9 – Section 5

Clauses 5.6.6 & 5.6.7: both make reference to accuracy/proficiency of results. For inhouse labs, Proficiency testing of personnel conducting tests may be required where applicable.

Section 5.8: Pet Food & Animal Feed (Animal feed now covered under this section)

Clause 5.8.3: Now includes the additional following elements:

- supplier approval equivalent to section 3.5.1 for all medicated raw materials
- specific staff training on the correct handling of medicated materials
- waste disposal mechanisms (see section 4.12) include the safe and legal disposal of medicated raw materials and products

Clause 5.8.4 (New)

- Site procedures shall be designed and implemented to meet the relevant pet food and animal feed product safety legislation (both in the country of production and in the country of sale).

Major Changes to BRCGS Issue 9 – Section 5

NEW : 5.9 - Animal Primary Conversion (applies to primary animal conversion – meat, poultry and fish – related to slaughter); 4 new clauses

Major Changes to BRCGS Issue 9 – Section 6

Clause 6.1.7 (New):

- Where a site handles products or materials (e.g. by-products from production processes) that are outside the scope of the audit, these shall be controlled to ensure that they do not create a product safety, authenticity or legality risk to products within the scope

Clause 6.2.1 – modified to include:

Processes shall be in place to check label use is reconciled with expected use and the cause of any inconsistencies investigated. (Possible mass balance of labels daily?)

Clause 6.6.3 – modified to include:

- processes for handling rejected packs

Major Changes to BRCGS Issue 9 – Section 7

Clause 7.2.1 Modified to include the following:

- Watches and **similar wearable devices** shall not be worn (**Fitbits?**)

Major Changes to BRCGS Issue 9 – Modules 8

Clause 8.2.3 (New)

Where sites include removeable walls as part of the design of the high risk or high care area (e.g. to allow occasional movement of large items or specialist maintenance equipment) procedures shall be in place to ensure:

- removeable walls are tight fitting
- use is controlled, movement of the wall is only completed by trained and authorised staff
- cleaning and reconditioning procedures are in place and completed prior to production

Clause 8.3.3 – Modified to cover off battery charging equipment

Clause 8.5.3 – modified to include:

- hygienically designed and fit for purpose
- cleaned and stored in a hygienic manner to prevent contamination (for example storing equipment in designated locations, off the floor, when not in use).

Major Changes to BRCGS Issue 9 – Modules 8

Clause 8.5.4 (New)

Where the site uses CIP equipment, this will either be dedicated to the area (i.e. separate equipment for high-risk, high-care and other production areas) or the CIP system shall be designed and controlled so that it does not present a risk of contamination to the high-risk/high-care area (i.e. controlling direction of flow from high-risk/high-care to low-risk areas, preventing the recycling or reuse of rinse solutions from one area to another).

Major Changes to BRCGS Issue 9 – Modules 9

Guidance: All the relevant requirements from sections 1 to 8 must also be fulfilled in addition to the requirements outlined in this section.

Where a site wishes to be audited against section 9 of the Standard, all of the food products and food raw materials traded must be included within the audit scope. It is not permitted to include some traded food products or food raw materials and exclude others.

- Non-conformities against clauses within section 9 of the Standard will be recorded on the audit report and included in **the calculation of the site's grade.**
- Where a site has traded food products or food raw materials onsite but wishes them to be excluded from the scope of the audit, this will be recorded as an exclusion from scope on the audit report.

1 new clause added to section so all existing clauses will need to be renumbered.. New clause relates to HACCP/

9.1 SOI (New) - The site shall operate a HACCP or product safety plan for the processes for which it is responsible

Major Changes to BRCGS Issue 9 – Modules 9

Clause 9.1.1 (New):

The company shall either

- have a HACCP or food safety plan specifically for the traded products handled onsite
- or
- incorporate the traded products into its existing HACCP or food safety plans (see section 2).
- The scope of traded products HACCP or food safety plan shall include the products and the processes for which the site is responsible, as a minimum this will include goods receipt, storage and dispatch. .

Other BRCGS Issues not related to Issue 9



Other BRCSG Issue – COVID 19

- Most BRCGS Covid 19 protocols ended July 1, 2022
- Audit types allowed are;
- Unannounced; Hybrid (1 day off site, 2nd day to be scheduled on site or Announced
- Remote audits are permitted as a LAST Resort but concession must be obtained from BRCGS before it can be conducted
- Risk Assessment Certificate Extensions are available; BUT the site must have had a regular or hybrid (Not remote) audit before the 2nd Risk Assessment Extension can be granted. Need a concession from BRCGS
- Requirements are in effect until Dec. 31, 2022

BRCGS Unannounced Audits

- Starting in 2022, BRCGS requires an unannounced audit every 3 years
- For Food, storage and Packaging audits
- Must have an unannounced audit in 2022, 2023 or 2024
- 1 in 3 cycle then repeats itself, every 3rd annual audit will be unannounced
- For initial BRCGS audit, audit will be announced, but then unannounced schemes starts
- Unannounced audits can occur in the last 4 months to audit due date
- site can specify 10 non-audit days in last 4 months to audit due date
- If you do not chose your unannounced audit year, we will

BRCGS Unannounced Audits

- No audit plan to be forwarded to client prior to audit
- Audit plan will be presented upon arrival
- Auditors are required to be on the production floor within 30 minutes of arrival!
- Site must accommodate auditor even if clients or regulatory personnel on site or key management personnel not on site – Alternates /Back-ups are important!
- Training of Alternates /Back-ups is critical!
- Previous audit score does not affect audit scheduling
- Audit window DOES NOT change with unannounced audit.

BRCGS Unannounced Audits - Challenges

1) Refuse auditor entry to site

- Site must accommodate auditor
- If not, Site certificate to be suspended immediately by BRCGS
- Unannounced audit to be rescheduled to be conducted within next 4 months.

2) Non-availability of Key Staff

- If Senior managers not available, then Deputies/Alternates/Bach-up must be available

3) No Production Scheduled

- Site to keep CB up-to date on non-production dates
- Site should try to schedule production for the 2nd day of the audit
- If can't comply, then r=CB to reschedule a follow-up unannounced audit

BRCGS Unannounced Audits - Challenges

4) Audit Duration due to Unannounced Audit

- Duration may be 30% longer due to need for site to organize upon auditor arrival

5) Site not Certificated following audit

- Unannounced re-audit to be conducted after 28 days

6) Seasonal Production

- Site to keep CB up-to date on non-production dates
- CB needs to carefully manage unannounced audit process

7) Exceptional Circumstances

- Auditor safety, weather, Covid – auditor can postpone unannounced audit

BRCGS Unannounced Audits - Challenges

8) Changing Certification Bodies (CBs)

- If changing CBs, site **must** remain on same audit cycle

BRCGS Compliance Audits

- We can expect to see an increase in BRCGS Compliance audits starting in 2022 due to lifting of Covid 19 restrictions
- All BRCGS Certificated Sites may be subject to a BRCGS Compliance audit at anytime
- BRCGS Compliance Auditor may provide limited notice or no notice of a compliance audit
- Site cannot deny them access (possible suspension of BRCGS Certificate)
- WHY? – Integrity Issues/Falsified Reports
- Audit reports prefilled by client, audit not conducted on date declared, Time and duration falsified.
- Consequences!
- Several Auditors have been banned from Conducting BRCGS Audits
- Sites found to be complicit will have certificate withdrawn

UPCOMING WEBINARS

[HTTPS://WWW.PJRFSI.COM/WEBINARS/](https://www.pjrfsi.com/webinars/)



Date: Tuesday August 16, 2022 – 11:00am – 12:00pm EST

Webinar Title: FSSC 22000: A Food Safety Management System for Packaging Manufacturers

Webinar Description - Join PJRFSI and returning guest presenter Jacqueline Southee of FSSC for this webinar on the topic of FSSC 22000 certification for Packaging Manufacturers! Topics covered will include:

- Introduction to FSSC 22000
- Relationship to other MSSs through Annex SL, including ISO 9001, 14001, 45001
- Benefits of the MS approach/alignment
- FSSC 22000 Certification for Packaging Manufacturing
 - ISO 22002-4/ Category I
 - Most common NC's seen in Cat I
- General Benefits of FSSC 22000

Stay tuned through the end of the presentation for Live Q&A with Jacqueline - get all your FSSC- and certification-related questions answered!





You've
got **QUESTIONS**
we've got **ANSWERS**

Paul McPhee

Phone: 416-592-0511

Email: paulmcphee.hapa@gmail.com