# BRC Global Standards
# Food Version 8

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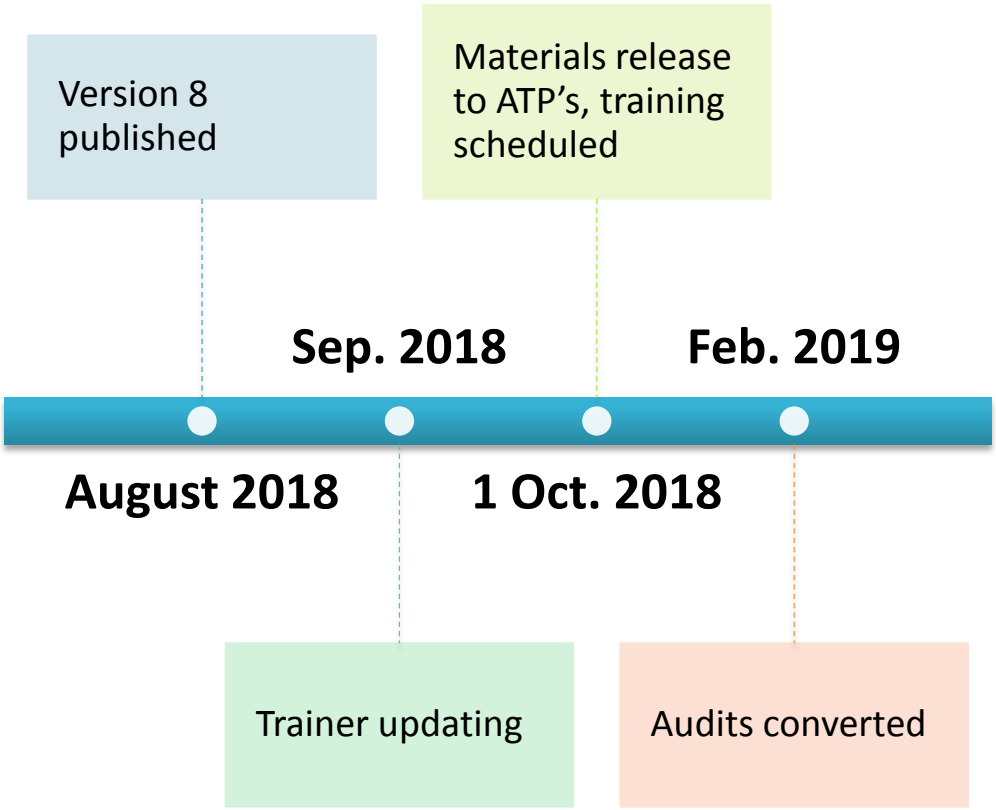
# Background to Issue 8

The consultation and review of emerging food safety concerns identified a number of opportunities for further development since the publication of Issue 7.

Therefore the key objectives were identified as:

- align Issue 8 with the proposed GFSI benchmark requirements
  - environmental monitoring
  - food defence/product security
- continue activities to reduce the burden of duplicate, private audits of certificated sites
- consider any potential implications of the US Food Safety Modernization Act (FSMA) requirements
- consider the practicalities of including product safety culture within the Standard
- review of the scope of the Standard
- review issues, incidents & recalls
  - product labelling

# Food 8 Timing



# KEY CHANGES TO THE REQUIREMENTS

# Management Commitment

INCREASED IMPORTANCE AND FOCUS DURING THE AUDIT.

INTERVIEWS WITH SENIOR MANAGEMENT

FOOD SAFETY AND QUALITY CULTURE AND OBJECTIVE SETTING

# Food Safety Culture

## Background & Objective

- Food safety culture is a fundamental factor in the management of product safety
- While challenging to audit, it is important that food safety culture is considered within a site and therefore within the requirements of the Standard

## Requirement

- Sites shall plan to maintain and develop product safety and quality culture within the business

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| **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. This shall include:<br>• defined activities involving all sections of the site that have an impact on product safety<br>• an action plan indicating how the activities will be undertaken and measured, and the intended timescales<br>• a review of the effectiveness of completed activities. |

Auditors will **NOT** be attempting to audit the culture of the site but will be looking at how sites have implemented the bullet points. Effectiveness will be assessed only on the 2nd issue 8 audit

# Reporting Issues

## Background & Objective

- Product safety is the responsibility of all staff – not just a select few
- Therefore all staff need to know how to report concerns and incidents

## Requirements

- Clause 1.1.5 amended – staff understanding importance
- Clause 1.1.6 added – confidential reporting system needed

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| 1.1.5 | The site shall have a demonstrable meeting programme which enables food safety, legality, integrity and quality issues to be brought to the attention of senior management. These meetings shall occur at least monthly.<br><br>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. |

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| 1.1.6 | The company shall have a confidential reporting system to enable staff to report concerns relating to product safety, integrity, quality and legality.<br><br>The mechanism (e.g. the relevant telephone number) for reporting concerns must be clearly communicated to staff.<br><br>The company's senior management shall have a process for assessing any concerns raised. Records of the assessment, and where appropriate actions taken, shall be documented. |

# HACCP/Food Safety Plan

## Background & Objective

- Some countries (e.g. the USA) have regulatory requirements that incorporate all HACCP processes outlined by Codex Alimentarius but use different terminology.
- Review wording for section 2 of the Standard on the HACCP Food Safety Plan to ensure compatible in all countries and geographies.

## Requirements

- Sites are required to meet the requirements of the Standard - specific terminology should not be an impediment to demonstrating compliance.

# Internal Audits

## Background & Objective

- Internal audits are one of the most powerful tools that a site has
- It is clear from the non-conformities raised and from our own compliance audits that many sites are still not effectively scheduling their internal audits throughout the year - where audits are only completed once or twice a year the system is more likely to lead to drops in standards between audits

## Requirements

- Clause 3.4.1 amended to make sure that the safety management systems are being assessed in depth at regular intervals – at least 4 audit dates per year

| CLAUSE | REQUIREMENTS |
| --- | --- |
| 3.4.1 | There shall be a scheduled programme of internal audits.<br><br>At a minimum, the programme shall include at least four different audit dates spread throughout the year. The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All activities shall be covered at least once each year.<br><br>At a minimum, the scope of the internal audit programme shall include the:<br><br>• HACCP or food safety plan, including the activities to implement it (e.g. supplier approval, corrective actions and verification)<br>• prerequisite programmes (e.g. hygiene, pest control)<br>• food defence and food fraud prevention plans<br>• procedures implemented to achieve the Standard.<br><br>Each internal audit within the programme shall have a defined scope and consider a specific activity or section of the HACCP or food safety plan. |

# Supplier Approval

## Background & Objective

- Safety, integrity, legality and quality of raw materials are fundamental to the site's operations
- GFSI benchmarking

## Requirements

- All of the requirements reviewed and updated to ensure rigorous control controls of raw materials whilst maintaining practical application

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| **Primary packaging** | The packaging which constitutes the unit of sale to the consumer or customer (e.g. bottle, closure and label of a retail pack or a raw material bulk container). |

# Product security & food defence

## Background & Objective

- Rigorous food defence systems have gained renewed understanding and should form an integral part of factory protocols
- Procedures adopted to assure the safety of raw materials and products from malicious contamination or theft

## Requirements

- Threat (risk) assessment with actions (a plan) based on risk.
- Scope of the risk (threat) assessment the same as the process flow diagram (clause 2.5) i.e. all stages when product is under the management control of the site.

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| 4.2.1 | The company shall undertake a documented risk assessment (threat assessment) of the potential risks to products from any deliberate attempt to inflict contamination or damage. This threat assessment shall include both internal and external threats.<br><br>The output from this assessment shall be a documented threat assessment plan. This plan shall be kept under review to reflect changing circumstances and market intelligence. It shall be formally reviewed at least annually and whenever:<br><br>• a new risk emerges (e.g. a new threat is publicised or identified)<br>• an incident occurs, where product security or food defence is implicated. |
| 4.2.2 | Where raw materials or products are identified as being at particular risk, the threat assessment plan shall include controls to mitigate these risks. Where prevention is not sufficient or possible, systems shall be in place to identify any tampering.<br><br>These controls shall be monitored, the results documented, and be subject to review at least annually. |
| 4.2.3 | Areas where a significant risk is identified shall be defined, monitored and controlled. These shall include external storage and intake points for products and raw materials (including packaging).<br><br>Policies and systems shall be in place to ensure that only authorised personnel have access to production and storage areas, and that access to the site by employees, contractors and visitors is controlled. A visitor recording system shall be in place.<br><br>Staff shall be trained in site security procedures and food defence. |
| 4.2.4 | Where required by legislation, the site shall maintain appropriate registrations with the relevant authorities. |

# Physical Contaminants

## Background & Objective

- Obviously vital that physical contamination of products is prevented
- Historically, the Standard has predominantly focused on metal detection
- There are some known potential contaminants that need site management

## Requirements

- Contamination of products or raw materials from packaging materials e.g. during deboxing or debagging
- Control of pens e.g. exclusion of pens with small detachable parts and detectable by foreign body detection equipment

# Environmental Monitoring

## Objective

- Introduce an important tool for identifying potential contamination risks
- Sites to develop a rigorous monitoring programme, enabling timely corrective action before product contamination occurs

## Requirements

- Monitoring of all factory production areas as a minimum areas with open ready to eat products
- Risk based programme developed
- Pathogens, spoilage organisms and/or indicator organisms should be considered

# Environmental Monitoring

## 4.11.8 ENVIRONMENTAL MONITORING

Risk-based environmental monitoring programmes shall be in place for pathogens or spoilage organisms. At a minimum, these shall include all production areas with open and ready-to-eat products.

4.11.8.1 Program designed properly
4.11.8.2 Appropriate limits and corrective actions
4.11.8.3 Review triggers

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|---|---|
| 4.11.8.1 | The design of the environmental monitoring programme shall be based on risk, and as a minimum include:<br>• sampling protocol<br>• identification of sample locations<br>• frequency of tests<br>• target organism(s)<br>• test methods (e.g. settle plates, rapid testing, swabs)<br>• recording and evaluation of results<br>The programme and associated procedures shall be documented. |

# Production Risk Zones

## Objective

- To promote understanding and best practice for the manufacture of products that require high risk, high care or ambient high care areas.
- Review the requirements to ensure practical application without reducing the effectiveness of the current requirements.

## Requirements

- Requirements remain largely unchanged from Issue 7 to Issue 8.
  - Equipment received back following maintenance
  - Waste management
  - Portable equipment
- Requirements have been relocated into a single, newly created, section of the Standard (section 8).
- Protocol and definitions reviewed and update for increased clarity

# KEY CHANGES TO THE PROTOCOL

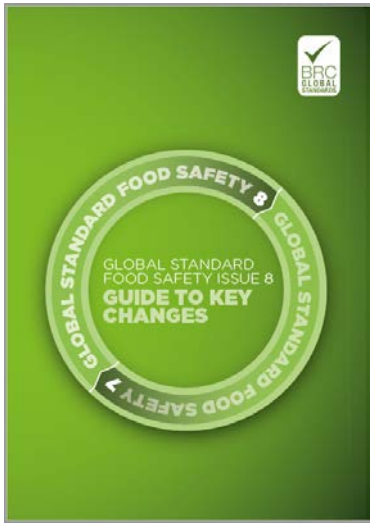
# Interim reporting

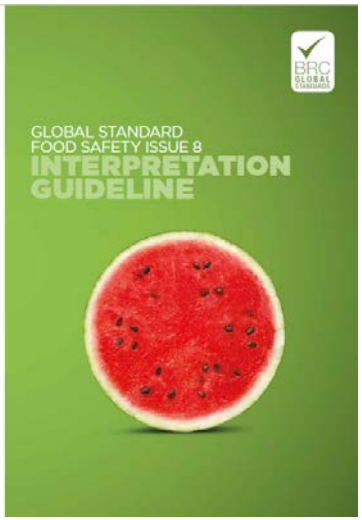
## Background

- One of the consistent concerns raised by key stakeholders (e.g. customers, certificated sites, regulators) is the time gap between audit and confirmation of certification (certificate & audit report).

## New Protocol

- Following each audit an ‘interim’ report shall be available on the BRC Directory within 10 calendar days.
- Contents strictly limited to date of audit, details of the audit scope and the non- conformities found.
- Final audit report will still be available after 42 days – currently being designed




# Where to find help

- Interpretation Guideline
- Key Changes Document
- FAQs – Published October onwards
- ‘Understanding’ Guidelines (22 for Issue 8)

# Your Training Options

| Target Audience | Course | Duration |
|---|---|---|
| Existing Food 7 ATP's | Food 7-8 Conversion for Trainers | 3 Days |
| New ATP's | Food 8 TTT | 4 Days |
| Existing Food 7 Auditors | Food 7-8 Conversion for Auditors | 2 Days |
| New Auditors | Food 8 Lead Auditor | 5 Days |
| New Auditors with Lead Status | Food 8 Auditor | 3 Days |
| Sites | Food 7-8 Conversion for Sites | 1 Day |
| Sites | Food 8 Sites | 2 Days |

# Global Markets – Food Targeting very small, and developing suppliers

- New auditor requirements
  - Field of Audit, no categories
  - 2 years experience
  - 2 training audits
- Reduced cost
- New protocol
  - Auditors able to provide guidance for improvement
- Launch late September

# FSMA Module

- Active August 2018
- Most used module ~ 500 sites


FOOD SAFETY AMERICAS 2019
CONSUMING CHALLENGES
MAY 21-22, 2019
Loews Coronado Bay, San Diego, California
brcglobalstandards.com/events