

BRC Global Standard for Food Safety Issue 6

A Guide to the key changes Issue 5 to Issue 6

The BRC published the Issue 6 of the Global Standard for Food Safety in July 2011 and the new Issue 6 Standard will be used for all audits from 1st January 2012. Certificates issued against Issue 5 will remain valid for the duration indicated on the certificate.

This document is intended to provide an introduction to the new Issue of the Standard and provides a guide to all users of the changes made to the Standard. Part 1 of this guide provides an overview of how Issue 6 was developed, the priorities and objectives in producing Issue 6 and an explanation of the key developments of the certification scheme.

Part 2 of this document looks in more detail at the requirements of the Standard, provides a management summary of the main changes to the Standard and the main reasons behind these changes. Companies will however need to purchase a copy of the full Standard and are advised to study the detail of how the requirements apply to their own operation before their next certification audit.

Part 1

Background to the production of Issue 6 and objectives

1. Consultation and development process

The BRC Food Safety Standard is widely used around the world and before starting the review for Issue 6, the BRC undertook an extensive consultation with the users of the Standard to understand the strengths and potential areas for improvement.

The feedback on Issue 5 was generally very positive and the continual growth in use of the Standard around the world, with nearly 14,000 certificated sites and over 20% growth in 2010, is a testament to its increasing international popularity. The consultation identified a number of opportunities for further improvement particularly with regard to the way that the audits are conducted:

- ensure a better balance of auditing time between the factory environment and paperwork review with more emphasis on good manufacturing practice
- ensure consistency of audit results so that the grades awarded are truly representative of the standards sites can maintain on an ongoing basis
- provide a path to allow recognition of sites which are still developing their food safety systems
- reduce the need for multiple customer and other audits
- ensure the audit report is focused and provides value and does not just add cost.

The rewrite process was directed by a steering committee made up of senior representatives from major retailers and food service companies using the Standard to ensure the Standard continues to develop in line with their own requirements.

The detail of the Standard was developed using 2 multi-stakeholder working groups made up of representatives from retailers, food service, Certification Bodies, manufacturers and UKAS. A separate group of North American users also provided input to working groups.

The draft Standard was tested in a series of trial audits and made available for public consultation. More than 1,700 people from around the world downloaded the draft document. All of the comments on the draft were reviewed before the final draft was produced.

The BRC would like to thank all of those people who have contributed to the development of the Issue 6 of the Standard.

Moving the Standards forward -Evolution not revolution

The main focus of the rewrite has been on the development of ideas to extend the reach of the Standard, provide options to differentiate the performance of sites and encourage a consistency of audit. The review of the requirements has focused on clarification and simplification rather than wholesale changes reflecting the feed back from consultation.

1. Increasing Focus on Good Manufacturing Practice (GMP)

Maintaining good and constantly improving standards of Food Safety and due diligence requires documented procedures and processes to ensure the consistency of working methods and provide information to identify areas for improvement. The implementation of the procedures within the factory, staff training supervision and working practices, factory hygiene and working conditions however ultimately affect the product safety and quality. Issue 6 attempts to rebalance the audit process by increasing the amount of time spent by the auditor within the processing areas.

The proposals for Issue 6 of the Standard and the auditor training package to accompany the Standard incorporate changes to increase the emphasis on the GMP aspects of the audit. These include:

- A two part audit checklist (in line with the unannounced audit option 2) which helps define requirements which are expected to be audited within the production areas
- A change in the balance of the number and depth of requirements in favour of good manufacturing practices rather than documentation of the systems
- A new more customer focused audit report format reducing report writing time and encourage a more challenging audit approach
- Greater emphasis on standardising best practices for auditing to the BRC Standard within the auditor training materials – discussions with production staff, challenging assumptions, audit trails, observing product change procedures etc.

Against a backdrop of an overall reduction in the number of requirements sections of the Standard covering foreign body control, hygiene and housekeeping and allergens have been expanded.

2. Refreshing the requirements

The rewrite has been used as an opportunity to look at the wording and lay out of the Standard to simplify and remove ambiguity.

A review has been undertaken of the statements of intent which precede each set of requirements in the Standard to ensure that these all express the required outcome with the following more detailed requirements supporting the achievement of the desired outcome.

Changes to the Standard have resulted in an overall reduction in the number of clauses by about 25% by removing or rolling together clauses so that each expresses a significant idea. This should also add to the consistency of grading as requirements now have a more similar significance.

The certification process has been strengthened by ensuring that not only are issues identified at the audit corrected but also the root cause is identified and an action plan put in place to prevent recurrence.

3. Unannounced audits- Increasing accessibility and reward

The use of unannounced audits by customers is becoming increasingly common in some markets and is seen as providing a greater challenge and more realistic assessment of sites' day-to-day standards. The unannounced scheme within Issue 5 was not well used partly because the benefits were not seen to outweigh the practical difficulties of having the entire audit conducted unannounced.

For Issue 6, the working groups have developed two options for unannounced audits both of which will be **voluntary**.

Option 1 – Full unannounced audit similar to Issue 5

Option 2 – An audit in two parts:

- Part 1 unannounced audit - largely based on factory operations and good manufacturing practice
- Part 2 - planned audit - based largely on a review of documented systems, procedures and records carried out at the usual audit due date.

The new option 2 audit allows sites to ensure availability of managers for the documentation review whilst still being able to benefit from the higher audit grade.

The increased emphasis on Good Manufacturing Practices with this approach and realism from the unannounced element will increase customer confidence in the audit and grades. The BRC will promote the unannounced scheme and help market the sites achieving the schemes top A+ Grade.

4. Encouraging Food Safety- The new Enrolment process

The BRC Standards have been adopted and used around the world with certificated sites in over 100 countries. Published as Issue 6, the Standard has rightly gradually increased the requirements for certification with each Issue as factory standards and our knowledge of food safety improves. It is important that as the standards for certification move forward there is still a path for sites which are currently developing their food safety systems to be recognised and encouraged to develop to ultimately achieve certification.

A new enrolment process will be introduced which will enable sites to register their audits on the BRC Directory and share their progress with customers as they develop their food safety systems. A progressive weighted scoring system will be introduced prioritising the basics of food hygiene to encourage improvement where sites are not certificated. This recognises the status of the sites and provides a measure by which to chart their progress towards full certification. The audit report and scorecard will be available on the private area of the BRC Directory only and enable sites to share results with their customers.

Whilst encouraging improvement, it is recognised that there must be a clear point of difference between certificated sites, meeting all of the requirements of the Standard. Only sites achieving full certification will be issued with a grade and certificate, have their achievement recognised on the BRC public website Directory and be able to use the BRC certificated site logos.

5. Ensuring transparency

The BRC Standard is designed both to assist companies to improve food safety and as a means of providing assurance to the certificated site's customers; by means of the report and certificate. The opportunity has been taken with Issue 6 to ensure that the scopes defined on certificates and reports clearly reflect the activities included within the audit process and that any exclusions are clearly identified. Exclusions from scope for Issue 6 have been more restricted and need to be justified. Factored goods have now been excluded from scope.

6. Completing the Jigsaw

The improvements to Issue 6 are not just about the Standard itself, but continued improvement of the entire scheme which supports the Standard, including training, the management of Certification Body performance, auditor competency and development.

Training – A new range of interactive training courses have been developed to provide information for both auditors and manufacturing sites and are available from the BRC and the international network of BRC Approved Training Providers (ATP's). All auditors registered to carry out audits against Issue 6 will be required to attend a two day training course and successfully complete an exam in order to be allowed to audit Issue 6.

Auditor Competence – Auditing against the BRC Standards requires a high level of technical knowledge, experience and interpersonal skills. The BRC has always required that auditors have industry sector knowledge in order to be able to audit a particular sector and auditors are registered by product category. The auditor competency working group for Issue 6 is defining category skills, knowledge and materials to assist Certification Bodies to evaluate and improve auditor's sector knowledge.

Certification Body management (compliance) - As well as being accredited by their national accreditation body the BRC also reviews the performance of all registered Certification Bodies against a set of key performance indicators (KPI's). The results of this performance rating will in future be published on the BRC Directory to allow sites to identify Certification Bodies with the best performance. The compliance activities will be extended to include more site visits and customer surveys. The BRC always welcomes feed back on the performance of the scheme.

Part 2

The main changes to requirements in Issue 6

General comments

Statements of intent – These have been reworded to be outcome based and express the objective to be achieved by the more detailed requirements for that sub section. The 'Statements of Intent' in addition to the individual requirements need to be complied with as in Issue 5.

Colour coding has been introduced to requirements within the Standard. This provides a guide for auditors on areas which are expected to be audited for the two part unannounced audit scheme and largely correlates with points which are expected to be audited either in the factory or in the document review.

Renumbering of requirements – There has been some re-ordering of sections within the Standard and re-numbering of requirements. This improves the flow of ideas within the Standard. There is **no** requirement for a company's own quality systems numbering to correspond with that of the clauses within the Standard, as long as the actual requirements are achieved.

Merging of requirements – there has been some merging of requirements which had been separate requirements in Issue 5. This has been done to ensure requirements have a more equivalent weighting of importance where non conformances are raised.

Section 1 - Senior Management Commitment

The section has been reorganised and now includes some requirements previously in section 3 for instance, *Organisational structure (1.2)*, *quality policy statement (1.1.1)*. The link between a company's policy statement, the setting of objectives and targets to achieve the policy, measurement of results and review through the management review process is made through requirements 1.1 - 1.3.

The new clause 1.10 is designed to be used where recurring Issues are raised at consecutive audits indicating the underlying causes of non conformities have not been addressed.

Section 2 - The Food Safety Management System – HACCP

The actual requirements for this section which are based on internationally accepted Codex Alimentarius principles are unchanged.

The exception to this is the new requirement for *Pre-requisite programmes (2.2)* which has been introduced to show the link between pre-requisite programmes and the HACCP process. This requires that the existing programmes are documented and where controls are via pre-requisites these are verified (2.7.3).

Section 3 - Food Safety and Quality Management System

The section has been re-organised with the transfer of some clauses to section 1, the removal of *customer focus* and inclusion of *control of non conforming products (3.8)* formally in section 4 of Issue 5.

The *internal audit (3.4)* requirements have been extended to include process/environment inspections clause 3.4.4 to give greater emphasis to the ongoing assessment of the processing environment.

Greater emphasis has been placed on *Supplier and Raw Material approval and performance monitoring (3.5)*. This now requires a documented risk assessment of raw materials (3.5.1.1) as the basis for establishing raw material supplier approval and sampling regimes. Within section 3.5 requirements for suppliers of raw materials (3.5.2) have been separated from the management of suppliers of services (3.5.3). A new section has been included to cover the *management of outsourced processing (3.5.4)*. This covers intermediate parts of a process which may be undertaken at another site e.g. Agglomeration of powders or maturation of cheese and ensures transparency to customers.

Requirements for *corrective actions (3.7)* and *complaint handling (3.10)* both now include requirements to ensure the root cause of the Issue is addressed.

The only change to the requirements for *Traceability (3.9)* is the inclusion of guidelines for the time, 4 hours, to retrieve records. This has been introduced to ensure information can be produced quickly in case of a recall. In practice however auditors will use the traceability exercise to undertake a review of processing records associated with the products chosen for the trace exercise.

Product recall now includes the requirement (3.11.4) to notify the Certification Body within 3 days where a recall is undertaken. This ensures that any incident can be reviewed and customers can have full confidence in certificates Issued.

Section 4 - Site Standards

Site security has attained greater significance with the global spread of the Standard and particularly where products are exported to the United States. A documented risk assessment of security arrangements is now included (4.2.1) to ensure security risks are adequately addressed.

High risk/high care – The Standard has attempted to clarify the where high risk and/or high care areas are required by introducing a decision tree and new guideline. The intention is to ensure a consistent interpretation. The requirements of high care areas have been increased particularly with respect to changing facilities (4.8.4) and segregation between high care and low risk areas (4.3.5) this reflects the protection which needs to be provided to high care products to control the risk from pathogens. In both cases risk assessment forms an integral part of satisfying the clauses.

The *lay out product flow and segregation (4.3)* section has been extended by the requirement for a site plan showing different risk zones (4.3.1) and incorporation of process and staff flows (4.3.2). This assists the organisation of process flow, identification of potential cross contamination points and appropriate levels of processing environment control.

Building Fabric (4.4) has been condensed but the expectation of sites is unchanged from Issue 5.

In recognition of the risk that water contamination can play in product safety a plan of the water system is now required (4.5.2). This is to be used in defining water sampling points and identifying areas where water may require treatment.

Within *Staff Facilities (4.8)* the requirements for both high care (4.8.4) and high risk (4.8.5) changing facilities are now more detailed to ensure a consistent approach and reflect established industry best practise.

The management of the risks to products of *chemical and physical contamination (4.9)* and *methods for detection and removal of foreign material (4.10)* has always had a high priority within the Standard. Within Issue 6 these requirements have been extended considerably to try to ensure a consistent approach. In particular the clauses reflect the management of risks from different materials and the different technologies available for removal of contamination. Depending on the type of production undertaken some requirements may not apply.

Housekeeping and Hygiene (4.11) is an area that was identified from the initial consultation as requiring greater emphasis and an area where most variability occurred on customer audits of certificated sites. Accordingly audits will generally incorporate observation of line-

change cleaning and may require dismantling of equipment for inspection where this does not adversely affect production. Cleaning standards are now required to be defined and validated to be appropriate for the particular risk (4.11.2). The new clause 4.11.3 expects resources and the planning of cleaning to take account of the cleaning of equipment which is only acceptable outside of production periods. New more detailed requirements have also been introduced to cover Cleaning in Place (CIP) systems (4.11.6) where these are used in liquid processing plants e.g. Dairies.

In recognition of increasing legal requirements on the use of "waste" food for Animal feed a new requirement (4.12.3) has been added to ensure products for animal feed are handled correctly.

The *Pest control* section has been revised to provide greater clarity on the expectations of a site where pest control is undertaken by the site (4.13.2). There is a new requirement for in depth pest control surveys (4.13.8) typically quarterly in addition to the routine pest control measures to provide an overview of the pest control programme.

The requirements for *Storage* (4.14) and for *Dispatch and Transport* (4.15) have been separated into two sections and more details have been added to the management of dispatch and vehicle checks. Off site storage facilities owned by the company must now be included in the audit or specifically excluded where these are within 50 Km of the main site. This is to ensure products are not at risk when stored.

Section 5 - Product Control

Product design and development (5.1) has been slightly revised to ensure that the development process does not unwittingly introduce new hazards to the production facility e.g. allergens without this being properly considered. Guidelines on products for development (5.1.1) and sign off of new products by the HACCP team leader (5.1.2) have been added to ensure new hazards are controlled.

Allergens (5.2) continue to be the cause of a significant number of product recalls both in North America and Europe. This area of the Standard has been revised to ensure that some of the main causes of the Issues are fully addressed. The list of controls to consider in making a risk assessment (5.2.3) and introducing allergen control procedures (5.2.4) have been extended. New clauses have been introduced to cover validation of cleaning methods to remove allergenic materials when changing products (5.2.8) and product change over and label checks (5.2.10). There is now a need for all production staff to be given a general allergen awareness training (5.2.9) to have an understanding of the Issues. Where it is not possible to prevent cross contamination the use of warning statements on products in line with legislative or industry guidelines has been added (5.2.6)

There are an increasing number of assurance schemes for primary agricultural products which require an assessment of the chain of custody in packing and processing operations to allow a claim to be made on products. To address that need and prevent the need for additional inspections the section *on identity preserved materials* (5.3) has been extended and renamed to specifically cover assurance claims. This includes verification of origin of raw materials (5.3.1), mass balance checks at least 6 monthly (5.3.2) and review of process flows to identify and control risks of product mixing or loss of identity (5.3.3).

The interaction between food and the *packaging* (5.4) in which it is in contact has been an emerging food safety issue. The new requirement (5.4.1) extends previous requirements concerning certificates of conformity for packaging and obliges the sharing of information on product characteristics and usage to allow the correct packaging to be used.

Section 6 - Process Control

Control of operations (6.1) has been reworded to ensure that the production process is managed through recipes and process specifications to control not only product safety but also consistent quality of the products produced (6.1.1). New clauses have been added to ensure that the production lines are checked before start up and at product changes (6.1.6) and that the correct packaging is used, and packaging changes and coding are carefully controlled (6.1.7) to prevent errors.

There have been no significant changes to requirements for *Quantity control* (6.2) or *Calibration* (6.3)

Section 7 - Personnel

This section of the Standard has been simplified with some rewording. The use of temporary workers often supplied by Agencies has been a significant development in recent years and auditors have been asked to ensure that temporary staff have been adequately trained and are aware of site hygiene rules. The *Training* section (7.1) has been extended by the requirement for sites to be able to retrieve training records for agency trained staff (7.1.4).

Requirements for *personal hygiene* (7.2) have been simplified to make these clearer. The wearing of jewellery other than plain wedding rings or wedding wrist bands is not permitted in production areas (7.2.1).

Medical screening (7.3) requirements have been reworded to take account of personal privacy laws which are present in some countries (7.3.2).

The requirements for *Protective clothing* (7.4) remain largely unchanged. Auditing of laundries however now only applies to laundries for High care/high risk clothing (7.4.4).

To obtain a copy of the Issue 6 Standard and for more details on the BRC Global Standards, please contact www.brcglobalStandards.com.