

# **BRC Global Standard for Food Safety – Issue 8**

## **Highlights of the changes from Issue 7**

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# Section 1

1.1.2 The site shall have a documented strategic plan for the development and continuing improvement of **Food Safety and Quality Culture**.

Including:

- **Defined activities** involving **all sections** of the company
- **An action plan** indicating how the activities will be undertaken and intended timescales
- **Review of the effectiveness** of completed activities \*\*

In terms of Culture, the Campden / TSI model defines 20 elements across 4 areas that need to be considered and addressed:

- For **People**: Empowerment; Reward; Teamwork; Training; and Communication.
- For **Process**: Control; Coordination; Consistency; Systems; and Premises.
- For **Purpose**: Vision; Values; Strategy; Targets; and Metrics.
- For **Proactivity**: Awareness; Foresight; Innovation; Learning ; and Investment.

## 1.1.4 Management Review Meetings

Review of any objectives that have not been met, to understand the underlying reasons for their failure.

Evaluation of incidents (including recalls and withdrawals)

## 1.1.5

Food Integrity shall be included in monthly meetings.

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.

## 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 to senior management.*

*The mechanism (eg the relevant telephone number) for reporting concerns must be clearly communicated to staff.*

*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.”*

## Section 2 (HACCP)

Numerous references to a **Food Safety Plan** due to FSMA, also a requirement for **training** as well as competence and experience for the Food Safety Team.

This satisfies the need for a PCQI in the USA.

## 2.1 A Food Safety Plan or HACCP Plan

### HACCP Reviews

2.14.1 A review shall take place following the emergence of a new risk (known adulteration of relevant information published, for example, a recall of a similar product)

Where appropriate, any HACCP review changes made shall also be reflected in the company's food safety policy and objectives.



# Documents and records

3.2.1. Where documents are stored in electronic form these shall be:

- Stored securely (eg authorised access, control of amendments, password protected)
- Backed up to prevent loss

3.3.1 The same applies for records

## Internal Audits

3.4.1. As a minimum the scheduled programme will include **at least 4 different audit dates** spread throughout the year

Each internal audit shall have a defined scope and consider a defined activity or section of the food safety or HACCP Plan

3.4.4 There should be a **separate** programme of documented inspection to ensure the factory environment and processing equipment is maintained

## 3.5.1.2 / 3.5.1.3

Split requirements for **supplier approval and monitoring**

*“There shall be a documented process for the ongoing review and monitoring of suppliers, based on risk and using defined performance criteria.*

*The process shall be fully implemented.”*

## 3.5.1.2

Where a supplier audit is completed by a 2<sup>nd</sup> or 3<sup>rd</sup> party then the company shall be able to:

- demonstrate the competency of the auditor
- Confirm the scope of the audit includes product safety, traceability, HACCP review and GMP
- Obtain and review a copy of the full audit report

Or, for low risk suppliers, and where a valid risk-based justification is provided, ongoing approval may be based on a completed questionnaire that has been reviewed and verified by a competent person.

### 3.5.1.4

The site shall have an up-to-date list or database of **approved suppliers** (hard copy or electronic).

The list or relevant components shall be readily available to relevant staff (eg. at goods receipt).

## 3.5.1.5 Raw materials from agents and brokers

Where raw materials (excluding packaging) are purchased from companies that are not the manufacturer, packer or consolidator (eg purchased from an agent or broker), the site shall know the identity of the last manufacturer or packer, or for bulk commodity products the consolidation place of the raw material

# Traceability of raw materials

3.5.1.6. Suppliers of raw materials (inc. packaging) have an effective traceability system. Suppliers approved by questionnaires, verification of the supplier's traceability system shall be carried out on first approved and then at least every 3 years.

Where a RM is received directly from a farm, further verification of the traceability system is not mandatory

## 3.5.2 Raw material and packaging acceptance, monitoring and management procedures

Controls on the acceptance of raw materials (including packaging) shall ensure that these do not compromise the safety, legality and quality of products and where appropriate any claims of authenticity



### 3.5.2.2

Where the site is in receipt of live animals, there shall be an inspection at lairage and evisceration to ensure that animals are fit for human consumption

### 3.5.2.3

Documented procedures shall be in place for the removal of packaging from raw material (eg debugging or deboxing procedures) to prevent contamination of the raw material during these processes

### 3.5.3.1

Documented procedure for the approval and monitoring of suppliers of services:

Such services shall include: **additionally food safety consultants**

This approval and monitoring process shall be risk-based and shall take into consideration:

- risk to the safety and quality of products
- compliance with any specific legal requirements
- potential risks to the security of the product (i.e. risks identified in the vulnerability and food defence assessments)

## 3.6.2 Specifications

These may be in the form of a printed or electronic document, or part of an online specification system.

Specifications shall be formerly agreed with the brand owner.

Specification review shall be sufficiently frequent to ensure date is current, taking into account product changes, suppliers, regulations and other risks.

Reviews and changes shall be documented

## 3.7.3

*“Information about non-conforming products shall be analysed for significant trends.*

*Where there has been a significant increase in a type of non-conformity or a non-conformity places the safety, legality or quality of a product at risk, **root cause analysis** shall be used to implement ongoing improvements and to prevent recurrence.”*

+ When, how, who?

## 3.8.1 Control of non conforming product

Additional requirement

Procedures shall include:

Root cause analysis and implementing ongoing improvements, to avoid recurrence

## 3.9 Traceability

3.9.2 The traceability test shall include a summary of the documents that should be referenced during the traceability test, and clearly show the links between these documents, thus demonstrating how the traceability system works

## 3.1.1 Management of incidents, product withdrawal and product recall

2 additional requirements -

3.11.1 Incidents may include:

Failure of, or attacks against, digital cyber security

3.11.2 Documented recall procedure should include:

Root cause analysis and implementing ongoing improvements, to avoid recurrence

## 4.2 Site security and Food Defence

Systems shall ensure that products, premises and brands are protected from malicious actions while under the control of the site



## 4.2.1

The company shall undertake a documented risk assessment. The risk assessment shall include both **internal and external** threats.

Vulnerabilities identified shall have documented mitigation strategies in place.

These controls shall be monitored and results documented.

The assessment and mitigation strategies shall be reviewed at least annually.....

## 4.2.2

Sensitive areas shall be defined, clearly identified, monitored and controlled. This shall include external product and ingredient storage and intake points.

Where prevention is not sufficient or possible, tamper evidence shall be in place.

## 4.2.3

Restrictive access policies and systems shall be in place for production and storage areas.

A visitor monitoring system shall be in place.

Staff shall be trained in site security procedures and food defence.

## 4.4.6

Where **elevated walkways** are adjacent to, or pass over production lines, they shall be:

- Designed to prevent contamination of products and production lines
- Easy to clean
- Correctly maintained

## 4.11.7.1 CIP Systems

*“All CIP equipment shall be designed and constructed to ensure effective operation.*

*This shall include:*

- validation confirming the correct design and operation of the system*
- an up to date schematic diagram of the layout of the CIP system*

*Where rinse solutions are recovered, and reused, the company shall assess the risk of cross-contamination (eg due to the re-introduction of allergens).*

*Alterations or additions to the CIP system shall be authorised by a suitably competent individual, before changes are made.*

*A record of changes shall be maintained.*

*The system shall be revalidated at a frequency based on risk, and following any alteration or addition.”*

## 4.11.8 Environmental monitoring

### SOI

*“Risk based environmental monitoring programmes shall be in place for pathogens and spoilage organisms. As a minimum, this shall include all production areas with open, ready-to-eat products.”*

## 5.1.4

*“Initial **shelf-life trials** shall be undertaken using documented protocols reflecting conditions expected during manufacture, storage, transport/distribution, use and handling to determine product shelf life.*

*Results shall be recorded and retained and shall confirm compliance with relevant microbiological, chemical and organoleptic criteria/sensory analysis.*

*Where shelf-life trials prior to production are impractical, for instance for some long-life products, a documented science-based justification for the assigned shelf life shall be produced.”*

## 5.2.5

*“Where cooking instructions are provided to ensure product safety, they shall be **fully validated** to ensure that, when cooked according to the instructions, they will consistently produce a safe, ready-to-eat product.”*

## 5.6.2.5

*“The significance of laboratory results shall be understood and acted upon accordingly.*

*Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.*

*Where legal limits apply these shall be understood and appropriate action implemented promptly to address any exceedance of these limits.”*



## 6.1.2

*“Where equipment settings are critical to the safety or legality of the product, **changes to the equipment settings** shall only be completed by trained and authorized staff.*

*Where applicable controls shall be password protected or otherwise restricted.”*

## 7.1.5

*“All relevant personnel (including relevant agency-supplied staff, temporary staff and contractors), shall have received **training on the site’s labelling and packing processes** which are designed to ensure the correct labelling and packing of products.”*

## Section 8 (High Risk, High Care and Ambient High Care Production Risk Zones)

### SOI

*“The site shall be able to demonstrate that production facilities and controls are suitable to prevent pathogen contamination of products.”*

## Section 9 (Traded Goods)

Where a site purchases and sells food products, that are stored in the site's facilities, that would normally fall within the scope of the Standard, but which are not manufactured, further processed or repacked at the site being audited, the site's management of these products may be incorporated into the audit scope.

### SOI

*“The company shall operate procedures for approval of the last manufacturer or packer of food products which are traded to ensure that traded food products are safe, legal and manufactured in accordance with any defined product specifications.”*

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