BRC Global Standard for Food Safety Issue 7

Siirl Siviye Dixon
Technical Manager, AGRI-Food
SAI Global Assurance Services
Our Presenter Today

Siarl Siviyer Dixon

- Technical Manager, AGRI-Food, SAI Global Assurance Services

- Siarl has gained 15 years of experience in the food industry working in various factories, at a small consultancy and in a Certification Body. In the last 12 years Siarl has specialized in auditing, training and food safety implementations.

- Siarl works with a variety of clients, from small owner operated companies to large multinational organizations. Recent work includes:
  - Implementing BRC Storage and Distribution and Packaging standards in North America
  - Achieving accreditation for our IFS PACSecure program
  - Training a new team of BRC Food auditors
  - Part of the N. American BRC Issue 7 revision team
Our Presenter Today

Chris Capuana

• Business Development Manager - SAI Global Information Services

• Chris works with clients to provide solutions for managing risk, achieving compliance and driving business improvement

• Chris has a strong history of developing strategic solutions that help individuals and organizations succeed
Agenda

- Additional requirements added to the Standard
- Expansions to existing Standard requirements
- Clarifications on High Risk and High Care
- Addition of Ambient High Care
- Q&A
BRC Core Principles

- Improve food safety
- Enable manufacturers to meet the demands of their customers reducing multiple audits
- Facilitate improvements and efficiencies in the manufacture of products
- Provide part of the due diligence defence for both customers and the certificated site
## Timelines for Issue 7

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<th>Time</th>
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<tr>
<td>Consultation and review</td>
<td>September 2013 to Jan 2014</td>
</tr>
<tr>
<td>Steering Committee sets objectives</td>
<td>Jan 2014</td>
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<tr>
<td>Rewrite Working Group meetings</td>
<td>Jan to May 2014</td>
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<tr>
<td>Draft issued for consultation</td>
<td>May 2014</td>
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<td>Road shows to consult</td>
<td>May 2014</td>
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<tr>
<td>Review of feedback and finalise Standard</td>
<td>June/July 2014</td>
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<tr>
<td>Develop guidelines, translations and training materials</td>
<td>July to Dec 2014</td>
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<tr>
<td>Road shows in UK, Europe and North America publicising changes</td>
<td>Oct to Dec 2014</td>
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Changes to the Audit Protocol
Scope/Exclusions from scope

Objective

- Ensure clarity for customers of the site
- Protection of the BRC Brand

Change

- Exclusions limited to the following conditions
- the excluded products can be clearly differentiated from products within scope
  AND
  - the products are produced in a physically segregated area of the factory
  - Logo use not permitted where exclusions present
Voluntary Modules

Objective

• Reduce multiple audits
• Meet specific geographical or customer requirements

Change

• Introduce additional voluntary modules, for example:
  • Traded goods
  • Food for animal feed
  • Chain of custody
  • Food defence
Grading

Objective
• Encourage differentiation and improvement
• Relieve pressure on reporting issues

Change
• New AA top grade for \( \leq 5 \) minor NCs
  ▪ A grade remains unchanged \( \leq 10 \) minors
  ▪ B and C grades redistributed over B, C and a new Grade D
Changes to the Audit Requirements
Fundamental Requirements

Objective

• Highlight requirements that are crucial to establishment and operation of effective food safety systems

Change

• 2 new fundamental sections:
  ▪ Management of suppliers of raw materials and packaging
  ▪ Labelling and pack control
Supplier Approval

Objective

• Update requirements to cover packaging
• Ensure sufficiently rigorous processes are in operation

Change

• Fundamental requirement
  ▪ All 3 clauses revised
  ▪ New requirement for traceability
### 3.5.1 Management of suppliers of raw materials and packaging

**3.5.1.1** The company shall undertake a documented risk assessment of each raw material or group of raw materials including packaging to identify potential risks to product safety, legality and quality. 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)

Consideration shall also be given to the significance of a raw material to the quality of the final product.

The risk assessment shall form the basis for the raw material acceptance and testing procedure and for the processes adopted for supplier approval and monitoring. The risk assessments shall be reviewed at least annually.
### 3.5.1 Management of suppliers of raw materials and packaging

| 3.5.1.2 | The company shall have a documented supplier approval and ongoing monitoring procedure to ensure that all suppliers of raw materials, including packaging, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval and monitoring procedure shall be based on risk and include one or a combination of:

- Certification (eg to BRC Global Standards or other GFSI-recognised scheme)
- Supplier audits, with a scope to include product safety, traceability, HACCP review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor.
- or, for suppliers assessed as low risk only, supplier questionnaires.

Where approval is based on questionnaires, these shall be reissued at least every 3 years and suppliers be required to notify the site of any significant changes in the interim.

The site shall have an up-to-date list of approved suppliers. |
### 3.5.1 Management of suppliers of raw materials and packaging

| 3.5.1.4 | The procedures shall define how exceptions to the supplier approval processes in clause 3.5.1.2 are handled (e.g., where raw material suppliers are prescribed by a customer) or where information for effective supplier approval is not available (e.g., bulk agricultural commodity products) and instead product testing is used to verify product quality and safety.  

When a site produces customer-branded product the relevant exceptions shall be identified to the customer. |
Traceability

Objective

• Meet concerns regarding supply chain traceability
• Visibility where agents and brokers are used

Change

• 2 new clauses:
  • Greater assurance of supplier traceability
  • Agents and brokers accountability
<table>
<thead>
<tr>
<th>3.9</th>
<th>Traceability</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.9.3</td>
<td>The company shall verify that its suppliers of raw materials have an effective traceability system. Where a supplier has been approved based on a questionnaire, instead of certification or audit, verification of the supplier’s traceability system shall be carried out on first approval and then at least every 3 years. This may be achieved by a traceability test. Where a raw material is received directly from a farm or fish farm, further verification of the farms traceability system is not mandatory.</td>
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</table>

<table>
<thead>
<tr>
<th>3.5.1</th>
<th>Management of suppliers of raw materials and packaging</th>
</tr>
</thead>
<tbody>
<tr>
<td>3.5.1.3</td>
<td>Where raw materials are purchased from agents or brokers, the site shall know the identity of the last manufacturer or packer, or for bulk commodity products the consolidation place of the raw material. Information to enable the approval of the manufacturer, packer or consolidator, as in clause 3.5.1.2, shall be obtained from the agent/broker or directly from the supplier, unless the agent/broker is themselves certificated to the BRC Global Standard for Agents and Brokers.</td>
</tr>
</tbody>
</table>
Labeling and Pack Control

Objective

- Address the most common issue resulting in product recalls and withdrawals

Change

- New Fundamental section: Labelling and Pack control
- New section: Product Labelling
- Detailed requirements to manage product change over
- Sample label verification within vertical traceability audit
### 5.2 Product Labelling

#### 5.2.1
All products shall be labelled to meet legal requirements for the designated country of use and shall include information to allow the safe handling, display, storage, preparation and use of the product within the food supply chain or by the customer. There shall be a process to verify that ingredient and allergen labelling is correct based on the product recipe and ingredient specifications.

#### 5.2.2
There shall be effective processes in place to ensure that labelling information is reviewed whenever changes occur to:
- the product recipe
- raw materials
- the supplier of raw materials
- the country of origin of raw materials
- legislation

#### 5.2.3
Where a product is designed to enable a claim to be made to satisfy a consumer group (e.g., a nutrition claim, reduced sugar), the company shall ensure that the product formulation and production process is fully validated to meet the stated claim.

#### 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 a change occurs which may affect the label information
### 6.2 Labelling and Pack control

| 6.2.1 | There shall be a formal process for the allocation of packaging materials to packing lines and control in the packing area which ensures that only the packaging for immediate use is available at the packaging machines. Where off line coding or printing of packaging materials occur, checks shall be in place that only correctly printed material is available at the packaging machines. |
| 6.2.2 | Documented checks of the production line shall be carried out before commencing production and following changes of product. These shall ensure that lines have been suitably cleaned and are ready for production. Documented checks shall be carried out at product changes to ensure all products and packaging from the previous production have been removed from the line before changing to the next production. |
| 6.2.3 | Documented procedures shall be in place to ensure that products are packed into the correct packaging and correctly labelled. These shall include checks:  
  - at the start of packing,  
  - during the packaging run,  
  - when changing batches of packaging materials  
  - at the end of each production run.  

The checks shall also include verification of any printing carried out at the packing stage including, as appropriate:  
- date coding  
- batch coding  
- quantity indication  
- pricing information  
- bar coding  
- country of origin |
| 6.2.5 | Where on line vision equipment is used to check product labels and printing, procedures shall be in place to ensure that the system is correctly set up and capable of alerting or rejecting product when packaging information is out of specification. |
Authenticity

Objective

• Encourage development of systems to avoid purchase of fraudulent products
• Response to requirements of EU Report 2013/2091

Change

3 new clauses:
• Access to information to inform risk assessments
• Vulnerability assessment of raw materials
• Introduction of risk based testing or assurance to mitigate risk.
## 5.4 Product Authenticity, Claims and Chain of Custody

<table>
<thead>
<tr>
<th>Statement of Intent</th>
<th>Systems shall be in place to minimise the risk of purchasing fraudulent or adulterated raw materials and ensure that all product descriptions and claims are legal accurate and verified.</th>
</tr>
</thead>
</table>
| 5.4.1               | The company shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of adulteration or substitution of raw materials. Such information may come from:  
  - trade associations  
  - government sources  
  - private resource centres. |
| 5.4.2               | A documented vulnerability assessment shall be carried out of all food raw materials or groups of raw materials to assess the potential risk of adulteration or substitution. This shall take into account:  
  - historical evidence of substitution or adulteration  
  - economic factors which may make adulteration or substitution more attractive  
  - ease of access to raw materials through the supply chain  
  - sophistication of routine testing to identify adulterants.  
  - Nature of the raw material  
  The vulnerability assessment shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risk. It shall be formally reviewed annually. |
| 5.4.3               | Where raw materials are identified as being at particular risk of adulteration or substitution appropriate assurance and/or testing processes shall be in place to reduce the risk. |
Ambient High Care

**Definition**

- Environment designed to minimise 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 temperatures
- 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
Where ambient high care areas are required a documented risk assessment shall be completed to determine the risk of cross-contamination with pathogens. The risk assessment shall take into account the potential sources of microbiological contamination and include:

- the raw materials and products
- flow of raw materials, products, equipment, personnel and waste
- airflow and air quality
- utilities (including drains)

Effective processes shall be in place to protect the final product from this contamination. These processes may include segregation, management of process flow or other controls.
Customer Focus and Communication

Objective

- Provide a link between the Standard and customer specific policies and requirements.

Change

2 New requirements:

- Implementation of customer specific policies, codes of practice
- Ensuring sub contractors and/or suppliers are aware of or adhere to customer policies where applicable
Managing surplus food and products for animal feed

Objective

• Ensure surplus food for food banks and charities is safe to eat.

Change

New requirements:

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

Objective

- Reflect good practice including global variations

Change

2 new clauses:

- Recording and managing pest activity
- Employees responsibility to report
### Changes to the Standard & Protocol

- **Minor changes to existing requirements**
- **Unannounced audits remain voluntary but extended to be accessible to all**
- **Enrolment program broken into 3 tier audit renamed BRC Global Markets**
- **Audit process and duration similar to Issue 6**
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BRC Global Standard Issue 7 Timeline

January 7, 2015
Publication of Issue 7

July 1, 2015
First audits against Issue 7
BRC Global Standard Issue 7

- For more information on the standard or for questions:

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<td>• ASC Standards</td>
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<td>• Gluten Free</td>
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<td>• Animal Welfare</td>
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## Environmental Management System

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## Medical Devices

• ISO 13485
• MDSAP

## Health & Safety Management System

• OHSAS 18001

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• SFI
• PEFC
• CoC
• CAN/CSA Z809
• CERTIFOR

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