BRC Global Standard for For Food Safety - Issue 6 Briefing Document

An NSF International Company

Overview of the key changes between Issue 5 and Issue 6.

Introduction

The BRC published Issue 6 of the Global Standard for Food Safety in July 2011 and this new 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. The intention of this document is to highlight some of the key changes between Issue 5 and Issue 6. It is not possible in a document such as this to provide a comprehensive list of every change. In order to prepare fully for an audit it will be necessary to purchase a copy of the standard at £95 from www.brcbookshop.com.

The scope of the Standard remains the same, however there is more focus on Good Manufacturing Practice. 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, working practices, factory hygiene and working conditions directly affect the product safety and quality. For Issue 6 auditors will spend much more time in factory processing areas holding discussions with production staff, following audit trails, observing product changeover procedures, etc. Requirements covering foreign body control, allergens, hygiene and housekeeping have been expanded.

Unannounced Audits

For Issue 6, as well as fully announced audits, there are now two options for unannounced audits both of which are voluntary.

Option 1 – Full unannounced audit,, no change from Issue 5

Option 2 – An audit in two parts:

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

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.

Other Administrative Points:

A^+ is the highest grade – this is only available to those in the unannounced schemes.

Corrective actions – have to be fixed within the 28 days, but there must also be a root cause analysis and a plan to prevent recurrence, i.e. to manage the timeliness and true closure of the NC.

Product Recalls – must be notified to CBs within 3 working days; CBs will investigate the reasons for the recall, this may involve site visits.

Audit Due Date – the audit must be undertaken on or before the audit due date indicated on the certificate – there will be no grace period. Companies are responsible for ensuring that announced audits are carried out in time; CBs are responsible for ensuring audits take place within the time frames for Unannounced Audit Options 1 and 2.

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Unannounced audits are truly unannounced and companies are expected to be able to demonstrate compliance with all requirements even though key staff may be unavailable, through deputies. Access to all areas, documents and records is essential.

Factored Goods, (goods not manufactured or only part processed on site but bought in and sold on), can no longer be included in the scope.

Scopes must accurately reflect the manufacturing processes undertaken on site – see page 118 Processed Food. Descriptions such as trade, selling, etc, are not permitted.

Successful audits are graded A^+, A; B^+, B; C^+, C. Unsuccessful audits have no grade.

The Enrolment Scheme

The Enrolment Scheme is designed for companies who have not previously been certified to Issue 5 or Issue 6 of the Standard. Such companies are considered to be developing towards achieving certification and will be able to demonstrate continuous improvement to potential clients by addressing the areas of weakness identified in a full BRC audit and improving their scores. Only new (to the BRC Global Standard) clients may be able to enter the Enrolment Scheme if they do not pass the audit.

The Requirements:

Statements of Intent have been re-worded and are auditable. Other clauses have been modified, moved or collated together so that each one now has the same weight / equal value. Where the Standard says "a procedure" this is expected to be documented. The Standard states in a number of places a minimum time e.g. at a minimum frequency of 3 months, as a minimum annually. This minimum frequency is only acceptable based on historical evidence and risk where the subject can be demonstrated as being fully under control. Risk Assessment is mentioned 13 times. These Risk Assessments must be documented.

1. Senior Management Commitment and Continual Improvement

1.1.2 Review of objectives – monitored and reported at least quarterly. Objectives need to include some food safety and quality objectives and include targets / clear measures of success.

1.1.3 Management Review records – auditors will expect to review good information inputs and output actions, and, that they are being acted on and monitored.

1.2 Deputies – how is this managed when key staff are not on site, implemented systems to make sure the site is covered / holiday periods; contact details, etc. Key issue with unannounced audits.

2. The Food Safety Plan—HACCP

PRPs not new – just collected into one place and must be included in the HACCP review.
Introduction of new machinery - this is often forgotten, it should always initiate a HACCP review.

HACCP validation – not acceptable to have a manufacturer's recommendation e.g. metal detection, must be some objective evidence of testing.

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3. Product Safety and Quality Management System

3.4.4 In addition to internal audits there shall be a programme of documented inspections of the factory environment and processing equipment – at a frequency based on risk but at no less than once per month in open product areas. Internal audits do not count as GMP audits, must be separate ones, frequency based on risk.

3.5.1.1 Consideration shall also be given to the significance of a raw material to the quality of the final product. Any materials supplied or specified by customers must still be assessed in terms of risk, controls, inspection, etc.

3.5.4.2 Outsourced processes have to be audited; sub contractors have to be audited – 3rd party certificate or by the company.

3.6 All specifications have to be reviewed whenever products change or at least every 3 years. The date of review and the approval of any changes shall be recorded.

3.6.2 Manufacturing instructions / specifications. Audit reports need to state what was checked and found to comply.

3.7.1 NCs need an investigation of the failure and how to prevent a recurrence – internal NCs as well as those identified in a BRC audit.

3.9 Traceability test must include a product, preferably purchased, AND a mass balance check of one of the ingredients. Mass balance calculations often do not take account of wastage, re-work, cooking losses, re-work breaks.

3.10 Complaints – statement of intent has been written to reduce recurring complaints

3.11 In the event of a product recall – the CB has to be notified within 3 working days. The CB is expected to review the causes of the recall and actions taken. This may involve a visit to the site which will have to be paid for by the certified site.
Recall tests have to include a test of the site's capability:– press statements, medical information public announcements, medical, contacts, etc. It does not have to be done in one go, it can be done over several weeks. It is not a traceability test – it is a lot more. It has to include for example provision for the transportation and warehousing of recalled products and their disposal.

4. Site Standards

Security. If selling into the USA a Vulnerability Assessment is needed. Known product misuse and malicious contamination are now included in the vulnerability.

4.3.1 New requirement. There must be an actual site plan with defined product zones.

4.4.4 New requirement. High Care / High Risk areas – there must be a plan of the drains available.

4.4.13 New requirement. Filtered air filter specification and frequency of air changes shall be documented.

4.5.2 New requirement. Plan needed of water distribution system, tanks, pipes, etc

4.8.5 Hand washing – with soap, water, towels is mandatory on entry to production areas – gels, disinfectants only are not acceptable.

4.9.1.2 Corrective action plans for building work / repairs might need to include non production time to allow materials to cure or smells to dissipate, especially where solvent based materials are used.

4.9.3.4 New requirement. How to clean up and deal with breakages for products packed in glass or ceramic containers.

4.10.2 Systems other than metal detection are increasingly being specified by customers. Materials retained in filters are expected to be examined and investigated to identify the source.
Metal detectors – alarm and belt stop systems only now permitted for "big" packs; or; (for example fragile packs where a rejection into a locked bin would cause damage).

4.10.5.1 New requirement. Optical sorting is new.

4.10.6.2 New requirement. Container cleanliness.

4.11.6 New requirement. Must review competency records for those people doing the cleaning.

4.11.6.2+3 New requirements. New clauses concerning CIP systems

4.12 New requirement. Tight controls needed for any food waste going back into the food chain.

4.15.6 New requirement. Documented procedures for the transport of products, including security.

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5. Product Control

5.1 NPD – There are no circumstances when this is not applicable, and that includes Produce sites.

5.2 New products have to be positively approved by the HACCP Team Leader before introduction to the factory.

5.2 Allergens. Many changes here. Most important is the VALIDATION of cleaning regimes. Validation has to be done several times to demonstrate that the cleaning is effective in removing allergen materials. Testing by, for example ELISA, Norgen, Geotechnical, etc rapid detection systems for specific allergen proteins. Company's must be prepared to demonstrate product changeovers, especially where allergens are involved.

5.3.2 New requirement. Provenance, Assured Status and claims of Identity Preserved materials – a mass balance check must be done every 6 months. Practices and procedures must be in place to prevent misleading claims.

6. Process Control

6 New requirement. Site to be classified into production zones based on risk – Production Zone Decision Tree applies, page 97:-

Enclosed Product Areas – warehouses, despatch areas where products and ingredients are fully packed; closed tanks and pipe work systems (breweries, wine, milk production)

Low Risk Area – ambient foods such as bread, fresh fruit and vegetables, dried foods

Low Risk Area – raw meats, prepared meals, uncooked products (chilled)

High Care Area – Fresh prepared, uncooked components, products (sandwiches, cured meats, dairy desserts with uncooked components).

High Risk Area – Foods which have been cooked – cooked meats, prepared meals without garnishes, dairy desserts with cooked components

7. Personnel

7 .1.2 Evidence of competency assessment must be in place for those involved in activities related to CCPs.

7.1.4 Details of training, including training by agencies, must be available

7.2.1 Personal Hygiene Rules all in one clause now; the wearing of ear rings is not permitted

7.2.2 Hand washing (with soap, water) when entering production areas is mandatory. Just using gels for example is not acceptable.

7.2.5 Personal medicines. Written instructions to staff to control the use and storage of personal medicines must be in place. It is about genuine medicines such as inhalers, insulin, Epipens (for treatment of anaphylactic shock) – it is not about headache pills.

7.3 Medical Screening – it is mandatory.

7.4.2 No external pockets above the waist or sewn on buttons.

7.4.4 High Care / High Risk protective clothing provided by a contracted laundry must be audited directly or by a third party with the relevant certification. (No longer a requirement for low risk production clothes).

7.4.6 New requirement. Risk assessment required for the frequency of cleaning items which cannot be laundered – e.g. aprons, gloves, chain mail.

Training Courses Available from NSF-CMi

1 day Issue 5 to Issue 6 Conversion Course for Manufacturers – no exam

2 day Understanding the Global Standard for Food Safety - for manufacturers and new auditors; with exam.

Further information can be obtained from:
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