



## BRC Food from version 5 to version 6 – what are the main changes



### Audit and certification consequences

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 1<sup>st</sup> January 2012. Certificates issued against Issue 5 will remain valid for the duration indicated on the certificate.

This document lists a summary of the main changes and impact on you as a certificate holder. Please be aware that this is a summary and not an exhaustive list of all the requirements of the Standard. You can purchase the full standard at [www.brcglobalstandards.com](http://www.brcglobalstandards.com).

### New rules for scope

It is no longer allowed to include *Factored goods* in the scope of the audit/certificate. If your company trades factored goods, there shall be an exclusion on the certificate.

Words such as sales, marketing, trade, growing, distribution and delivery are not permitted in the scope.

Production of specific or other certificated products (e.g. organic, halal, vegetarian or specific allergen claims) shall not be included in the scope as these claims are verified under other standards. The details may be included

in the report within the chapter "company profile".

## Background to Issue 6 and objectives

### 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 affects 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 to 50% of on-site audit time.**



### 2. Unannounced audits

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. In Issue 6, there are 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 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.

Please notify your ISACert contact if you want more information or wish to enter the unannounced audit program.

### 3. The new Enrolment process

For sites not BRC certified, and are not yet fully up to standard to pass the first audit, a new enrolment process has been 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. 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.

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.



## The main changes to requirements in Issue 6

### Section 1 - Senior Management Commitment

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

New in this chapter is 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

New in this chapter are *Control of non conforming products (3.8)*; *The internal audit (3.4)* requirements have been extended to include process/environment Inspections and *Management of outsourced processing (3.5.4)*. Another new section has been included to cover the 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.

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. The requirements for *Traceability (3.9)* now include guidelines for the time, 4 hours, to retrieve records. *Product recall (3.11.4)* now includes the requirement 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 risk/high care areas are required by introducing a decision tree and new guideline 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.

If you are not sure whether this applies to your company, please contact your ISACert office to find out well before your audit date.

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).

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) have been extended considerably to try to ensure a consistent approach.

*Housekeeping and Hygiene* (4.11) has greater emphasis. 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.



### **Section 7 – Personnel**

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).



For more information contact your local ISACert office or look on our website for an ISACert office near to you.