

TUV Staff Highlight



Paul Fallaw is Program Manager of TUV USA's Food Safety Division. Paul has over a decade of auditing and consulting experience; he is a recognized food specialist with in-depth expertise in quality assurance, product development, regulatory affairs, manufacturing, and packaging.

Prior to a career in third-party certification, Paul held various roles in Quality Assurance and Regulatory Compliance with Hain Celestial Food Group, Cargill and Kraft Foods. His strong analytical abilities, proven technical leadership and management skills make him a great addition to the TUV USA team. Paul has a B.S. in Chemical Biology from Rhodes College in Memphis, TN.

What's new in issue 8: BRC Global Standard for Food Safety

By Paul Fallaw and Lori Carlson

Issue 8 of BRC's Food Safety Standard is out for public comment and TUV USA is excited about the proposed new changes! At first glance, it's hard to miss new sections 8 and 9 and about two dozen new clauses, but what results is a food safety management standard improved in the areas of efficiency, functionality, and consolidated industry best practices. Are you curious about issue 8, new requirements, and how to get involved and comment? Read on as TUV highlights some of our key takeaways from the upgraded Standard.

While two new sections may seem daunting at first glance, BRC has its stakeholders' best interests at heart with streamlined efficiency and enhanced competency in food safety management and certification. All high risk, high care, and ambient high care requirements are now centralized in section 8, which lends itself to more focused management and auditing against high risk/ high care requirements where applicable. Section 9 incorporates voluntary module, Traded Goods, which is now under the framework of an accredited standard providing increased confidence in the certificated module. While section 9 remains voluntary in issue 8, non-conformities assigned against section 9 requirements will now be included in a site's audit grade.

New clauses help ensure the Standard more closely aligns with industry best practices, meets new GFSI benchmarking requirements, and captures the intent of new and emerging food regulations. Most notably are new clauses relating to senior management commitment, supplier monitoring and material acceptance, food defense, environmental monitoring, and product design/ development.

New to section 1 (Senior Management Commitment and Continual Improvement) are requirements for senior managers to establish a strategic plan for cultivating a food safety culture; develop a system that enables employees to confidentially report product safety,

quality, and integrity issues; and ensure the company follows protocol requirements of the Standard, including those related to BRC logo use.

While already a leader in food safety management requirements for assessing material/ supplier risks and establishing robust mechanisms for supplier approval and material acceptance, BRC refined this area with several new clauses. This includes the requirement for a documented supplier approval list (or database) accessible to relevant staff, ongoing monitoring and review of suppliers against defined performance criteria, procedures for notifying receiving personnel of approved material changes to ensure the correct version of materials are accepted, and lairage/ evisceration inspection to ensure fitness for human consumption where live animals are received.

Sub-section 4.2 (Security)—now titled Site Security and Food Defense—was largely overhauled in consideration of food defense, threat assessment, and mitigation requirements established in *GFSI Benchmarking Requirements v7* and the Food Defense rule of the U.S. Food Safety Modernization Act (FSMA). While technically only one new clause was added, all requirements were significantly amended to bring the Standard into greater alignment with recognized best practices for food defense management. New changes require that site's complete a risk assessment of internal and external threats and review annually; mitigate risks to raw materials, products, and site areas; and monitor all applied controls along with an annual review of their effectiveness.

In similar fashion for GFSI and regulatory alignment, sub-section 4.11.8 (new) adds three clauses aimed at supporting sites in developing, maintaining and improving an environmental monitoring program. The risk-based program shall include monitoring for pathogens and spoilage microorganisms with a minimum requirement for monitoring in all production areas where ready-to-eat (RTE) products are exposed to the environment. Environmental monitoring expectations put forth are well-described to help sites gain the most benefit out of this valuable preventive tool and include requirements for a highly defined monitoring plan inclusive of sampling protocols, monitoring locations, test methods, control limits, and corrective action. The plan shall be reviewed annually (at minimum) to evaluate its effectiveness and consider product failures (i.e., positive environmental pathogen result on product) or trends such as consistent, negative swab results potentially indicating ineffective monitoring.

Three new clauses added to sub-section 5.1 (Product Design and Development) target pet food manufacturers to ensure formulations meet intended use and contain raw materials and ingredients appropriate for the species. Where medicinal substances form part of the formulation, they shall be managed to ensure correct dosage, accurate labeling, and the prevention of contamination in non-medicated products.

New protocol changes help fast track audit reporting and communication via the BRC Directory with the requirement for interim reporting within 10 days of the audit. The interim report is not required to contain details observed during the audit or the site's grade but rather, is intended to communicate site information, audit scope, and assigned non-conformities. New changes to the audit report may also be underway pending continued input and revision from the working group. An additional criterion of the vertical audit, whereby auditors will evaluate a product label against the product specification and recipe for correctness, aims at reducing product recalls and withdrawals for mislabeling. And lastly,

protocol changes improve the disclosure of activities surrounding food safety incidents between a site and its certification body by requiring the establishment of procedures for notifying CB's of legal proceedings against a company for food safety or issues significantly affecting the operation, regulatory enforcement actions (e.g., notices), and any recall or withdrawal since the last audit. This expands the current requirement of 3.11.4.

Are you interested in learning more about issue 8 and commenting on the proposed changes? Get involved at [Issue 8 Draft](#); BRC wants to hear from you!

About TUV USA, Inc.

TUV USA, Inc. is an ISO accredited certification body offering food safety certification against the BRC, SQF, FSSC 22000, IFS, and GLOBALG.A.P. standards. [Contact us](#) for more information about our food safety services, upcoming training courses, and industry events. [Click here](#) to subscribe to our monthly newsletter.

About the Author

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