

BRCGS Food Safety Issue 9

What's changed?

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Important changes

Why upgrading?

GFSI Benchmark
Sector specific
requirements
for slaughter

Continued evolution of
product safety culture
and
fraud prevention

Product recalls and
withdrawals (and
processes
for managing

New auditing techniques
and approaches

Emerging new products
safety risks
High risk/High Care
Products

Changes in global food
safety legislation and
Standards e.g.: Codex,
ISO
22003-2

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Important changes

Timeline



Mandatory from 01 February 2023 forwards

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Important changes

Scope of the standard

The Standard sets out the requirements for the manufacture, processing and packing of:



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Important changes



Change in the unannounced audits window

- The unannounced audit may occur at any stage within the last 4 months of the audit cycle.
- A site may select up to **10** non-audit days
 - Sites with a six-month audit window (e.g. sites certified to the C or D grade standard) may nominate up to 5 days

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Important changes

Audit option in issue 9

- Option 1 – Announced audit program (with mandatory unannounced audit every 3 years)
- Option 2 – Blended announced audit program (with mandatory unannounced audit every 3 years)
- Option 3 – Unannounced audit program

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Important changes

Blended announced audit program

- The audit is split into two separate parts: a remote audit followed by an on-site audit.
- The blended audit option is available for announced recertification audits only and not for initial audits

Part 1

- Announced remote audit
- Occurs within the 56 days prior to the audit due date

Part 2

- Announced on-site audit
- Occurs within 28 days of the remote audit (Part 1)

Changes to the requirements

1.1 Senior management commitment and continual improvement

- Policy to include commitment to continuously improve the site's food safety and quality culture
- The food safety culture plan shall include measures needed to achieve a positive culture change:
 - Clear and open communication on product safety
 - Training
 - Feedback from employees
 - The behaviours required to maintain and improve product safety processes
 - Performance measurement of activities related to the safety, authenticity, legality and quality of products
- The plan shall be reviewed and updated at least annually, at a minimum.

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Changes to the requirements

1.1 Senior management commitment and continual improvement

- The most senior production or operations manager shall participate in the opening and closing meetings and a member of the senior management team shall be available for a discussion on effective implementation of the food safety and quality culture plan

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Changes to the requirements

1.2 Organisational structure, responsibilities and management authority

- Staff shall be aware of the need to report risks or evidence of unsafe products
- Food safety, quality, legality and authenticity remains the responsibility of the site when using external expertise

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Changes to the requirements

2. The food safety plan – HACCP

- Where the control of a **specific** food safety hazard is achieved through prerequisite programmes or control measures other than CCPs, this shall be validated
- HACCP or food safety plans shall be validated **prior** to any changes which may affect product safety, to ensure that the plan will effectively control the identified hazards **before** implementation.

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Changes to the requirements

3.4 Internal audits

- Fabrication inspections are more clearly described (e.g. doors, walls, facilities and equipment)
- The results shall be reported to the responsible personnel
- Corrective actions, and timescales for their implementation, shall be agreed and verified
- Results of the inspections shall be reviewed in the management review meetings

Changes to the requirements

3.4 Management of outsourced processing

- Definition has been expanded: Outsourced processing is any intermediate process step (including production, processing or storage). During outsourced processing, the product leaves the site for the completion of the outsourced processing before **returning** to the site. The audited site may or may not complete the additional packing or processing steps of the product.
- Outsourced process shall form part of the site's food safety plan (HACCP plan).
- Requirements for outsourced processing shall be agreed in a service specification (similar to a finished product specification).
- Outsourced processing operations shall maintain product traceability
- A documented acceptance procedure for products where part of the processing has been outsourced shall be established.

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Important changes

Changes to the requirements

3.7 Corrective and preventive actions

- Corrective action procedure for handling and correcting issues and include the **root cause analysis** and implementation of preventive action
- Where a non-conformity places the safety, authenticity or legality of a product at risk, or where there is an adverse trend in quality, this shall be investigated and recorded

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Changes to the requirements

3.11 Management of incidents, product withdrawal and product recall

- Significant food safety, **authenticity or legality** incident shall be notified to the CB within 3 working days.
- The company shall provide sufficient information (corrective action, root cause analysis, preventive action plan) within 21 calendar days.

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Changes to the requirements

4.1 External standards and site security

- Visitor recording system shall be in place
- Visitors, contractors and staff need to be aware of procedures for access
- All visitors must have someone on site responsible for them

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Important changes



Changes to the requirements

4.2 Food Defence

- Responsible for food defence shall understand potential food defence risks at the site and the principles of food defence
- Where there is a legal requirement for specific training, this shall be in place.

Changes to the requirements

4.4 Building fabric, raw material-handling, preparation, processing, packing and storage areas

- Elevated walkways supplemented with access steps or mezzanine floors
 - Care needs to be taken in design, cleaning and maintaining areas above, adjacent/near production
- Plastic strip curtains shall be maintained in good condition, clean, fitted correctly and shall not pose a food safety risk.

Changes to the requirements

4.6 Equipment

- A documented purchase specification is needed for any new equipment:
 - Detailing the requirements
 - Reference to relevant legislation
 - Requirements for contact surfaces
 - Suitable for intended use
- Evidence that equipment meets the site requirements must be available prior to supply

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Changes to the requirements

4.6 Equipment

- Documented risk-based commissioning procedure shall be in place
- Documented cleaning and inspection before use
- Inspected by authorised staff before being accepted
- Update of existing site procedures (e.g. training, operating procedures, cleaning, environmental monitoring, maintenance schedules,...)
- Design and placement shall ensure effectively cleaning and maintained

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Changes to the requirements

4.6 Equipment

- There must be a documented procedure which covers how food safety and equipment integrity will be maintained during movement of the equipment
- Procedures shall be in place to bring equipment back into use, including cleaning
 - Equipment not used shall be cleaned and appropriate stored
 - Equipment stored in production and storage areas shall be kept clean
 - Stored equipment that is not daily used shall be cleaned prior to use

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Changes to the requirements

4.6 Equipment

- Mobile equipment shall not pose a risk to the product
- Where the use of mobile equipment in external areas cannot be avoided and poses a risk to the product, the equipment shall be cleaned and disinfected prior to entering production areas.
- Battery-charging equipment shall not be stored where they are a possible source of product contamination

Changes to the requirements

4.9.6 Other physical contaminants

- Physical contaminants are no longer limited to pens, a longer list of examples is given
- Procedures shall be implemented to minimise all types of foreign-body contamination

4.10.3 Metal detectors and X-ray equipment

- New clause on X-ray
- It is important that the effectiveness is verified

4.10.7 Other foreign-body detection and removal equipment

- New clause on all other foreign-body detection than metal detection and X-ray
- Again the effectiveness must be verified

Changes to the requirements

5.1 Product design/development

- A process for new product development and changes to existing products must be formalised
- Safety, legality and integrity maintained

5.2 Product labelling

- Label made by customer:
 - Information for accurately creating
 - Information on changes

Changes to the requirements

5.4 Product authenticity, claims and chain of custody

- Responsible for food fraud shall understand potential food fraud risks of raw materials and the principles of vulnerability assessment.
- Minimal yearly review of the assessment and whenever there is:
 - A change in raw materials or a supplier
 - Emergence of a new risk
 - A significant product safety incident on authenticity

Changes to the requirements

5.6 Product inspection, on-site product testing and laboratory analysis

- Issue 8 sections 5.6.1 Product inspection and testing and 5.6.2 Laboratory testing have been combined.

5.8 Pet food and **animal feed**

- Additional requirements on
 - Supplier approval for all medicated raw materials
 - Specific staff training on the correct handling of medicated materials
 - Waste disposal mechanisms that include the safe and legal disposal of medicated raw materials and products
- Meet the relevant legislative requirements both in the country of production and in the country of sale

Changes to the requirements

5.9 Animal primary conversion

- New section
 - Risk assessment for potential prohibited substances
 - There must be traceability of all the edible parts of the carcass
 - Establish postslaughter times and temperatures to ensure product safety

6.1 Control of operations

- The site must consider and manage any potential product safety, authenticity and legality risks of products or materials outside of the scope of the BRCGS audit

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Changes to the requirements

7.4 Protective clothing: staff or visitors to production areas

- Clarification on laundering of protective clothing
 - Home laundering is exceptional but acceptable where:
 - Protective clothing is not used for food safety purposes
 - Protective clothing is used in low risk areas or enclosed products

Changes to the requirements

8.2 Building fabric in high-risk and high-care zones

- Documented procedure exist to ensure removeable walls are used in a control way
 - Tight fitting
 - Their use is managed
 - Movement only by trained and authorised staff
 - Cleaning and reconditioning procedures in place and completed prior to production

8.5 Housekeeping and hygiene in high-risk and high-care zones

- CIP equipment shall not pose a risk

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Important changes

Changes to the requirements

9.1 The food safety plan – HACCP

- The company shall:
 - Have a HACCP or food safety plan specifically for the traded products
 - Incorporate the traded products into its existing HACCP

Good luck

THANK YOU