

## BRCGS Food Safety, Issue 9

### Key focus

#### Scope of the Standard

The scope of the Standard has been reviewed and focuses on product safety, authenticity, quality and legality. The Standard does not cover other activities such as environmental, ethical or financial arrangements.

#### Requirements

Below is a summary of the key changes to the requirements in the Standard. A full Issue 8 to 9 key change document has been published alongside the Standard and Interpretation Guideline (available on BRCGS Participate or from the BRCGS Store):

##### Section 1

A number of clauses in this section have been added or amended. The most significant include:

- Adding culture in the statement of intent and a wider range of the clauses
- Expanding clause 1.1.2 to provide greater structure to the product safety culture plan
- The role of senior managers at the audit (clause 1.1.11)
- Re-location and amendment of some of the clauses, for example, clause 1.2.3
- New requirements relating to external product safety expertise (clause 1.2.4)

##### Section 2

Updated to reflect the 2020 update to the Codex General Principles of Food Hygiene. The most notable changes are:

- Amendments to sections 2.2, 2.7 and 2.12
- The relocation of clause 2.14.1 into section 2.12 to create a coherent section on validation and verification within the HACCP process

##### Section 3

Chapter 3 has been significantly updated to:

- Increase details on the expectations for the company's internal audit programme, corrective action, root cause analysis and preventive action processes, to encourage best practice in the use of these fundamental product safety activities
- Expand the management and reporting of incidents such as product recalls
- A review of the supplier and raw material approval requirements, including amendments to the sections on suppliers of services and outsourced processing

##### Section 4

A number of clauses in this section have been added or amended with some significant changes:

- Site standards and site security have been combined into a single section (section 4.1)
- Competency (e.g. product knowledge, site knowledge and knowledge of food defence principles) added to section 4.2

- Section 4.3 has been updated to provide a clear link with production risk zones (e.g. an assessment of the appropriate production risk zones for the site using appendix 2 and inclusion on the site plan)
- Additional requirements have been added to section 4.4 for steps and mezzanine floors over production lines, and for strip curtains
- A complete update to section 4.6 to reflect the growing knowledge on the importance of hygienic design and management of equipment
- Requirements for x-rays and miscellaneous foreign-body detection methods have been added to section 4.10
- Section 4.16 has been updated to ensure consistency with section 3.5

## Section 5

A number of clauses in this section have been added or amended. The most significant are:

- Competency (e.g. product knowledge, site knowledge and knowledge prevention of food fraud and vulnerability assessment principles) added to section 5.4
- Section 5.6 has been restructured and simplified (sections 5.6.1 & 5.6.2 have been combined into a single section)
- Requirements for animal feed have been added to those for pet food in section 5.8
- Sector specific requirements for primary animal slaughter have been added to create a new section 5.9

## Section 6

The most significant addition to section 6, is the new requirement for the management of operations that are outside the scope of the audit.

Sites are also required to complete a reconciliation of printed labels to confirm actual use matches expected use (clause 6.2.1).

## Section 7

A majority of the changes to this section are designed to provide clarity on the requirements and are based on enquiries received by BRCGS during the lifetime of Issue 8. For example:

- Clarification on training requirements within clauses 7.1.1 and 7.1.2.
- Amendments to the colour coding of the clauses (e.g. clauses 7.1.4 and 7.1.5).
- Amendments to section 7.3
- Clarification on the situations in which home laundry is permitted (clause 7.4.3)

## Section 8

A number of clauses in this section have been added or amended. The most significant are:

- Amendments to reflect the changes in section 4.3 (e.g. changes to clause 8.1.1)
- Changes to the colour coding of several requirements. The dual colouring highlights that these requirements must be audited during both the audit of production facilities and the audit of records and documentation
- A new requirement has been added where a site has removable walls for access to high risk or high care areas (clause 8.2.3)
- Clause 8.5.3 has been expanded to reflect the additional controls needed to prevent equipment becoming a source of product contamination

- A new require has been added for sites that have CIP systems in high risk or high care areas (clause 8.5.4)

## Section 9

There are 3 significant changes to section 9:

- An updated definition of traded products allowing a larger range of products to be included within this section
- Requirements for traded products to be included within the scope of a HACCP plan have been added (section 9.1)
- Clause 9.6.1 has been updated to include details of the traceability system for traded products

## Additional Voluntary Modules

Additional voluntary modules will be available for sites when Issue 9 audits commence in February 2023:

- Module 10 – GlobalG.A.P. Chain of Custody
- Module 11 – Meat Supply Chain Assurance
- Module 13 – Meeting FSMA Requirements for Food

Modules 11 and 13 have been published and are available on BRCGS Participate and from the BRCGS Store.

An updated module 10 (GlobalG.A.P. Chain of Custody) will be published in January 2023.

Asda AA module will not be carried out after January 2023.

New additional voluntary modules may be added later.

## Transition of unannounced audits from Issue 8 to Issue 9

Issue 9 audits start on 1 February 2023 therefore:

- audits starting before 1 February 2023 (including audits starting in January 2023) are to be completed to Issue 8
- audits starting in February 2023 or any date after the 1 February 2023 are to be completed to Issue 9

Any queries regarding transition from Issue 8 to Issue 9 can be addressed to [uk.food@kiwa.com](mailto:uk.food@kiwa.com).

## Blended Audits

Where the first part of a blended announced audit commences prior to 1 February 2023 (for example in January 2023), the entire audit (both remote and onsite parts) are completed as an Issue 8 audit.

Where the first part of a blended audit commences on (or after) 1 February 2023 the entire audit is completed as an Issue 9 audit.

## Head Office Audits

Where a head office audit is completed prior to 1 February 2023, it will be completed to Issue 8 of the Standard.

If subsequent site audits are completed after 1 February 2023, these must be completed to Issue 9. In this situation, the company may need to provide additional information regarding head office activities to demonstrate full compliance to the Issue 9 requirements – this shall be provided during the site audits. In conjunction with the company, certification bodies may wish to consider whether to audit the head office to issue 9 requirements in the first place.