

BRC Global Standard for Food, Issue 7 – summary of changes.

When considering what should be changed in the BRC Food standard the maxim the committees adhered to was “evolution, not revolution”. It was recognised that issue 6 of the standard worked well and so we should aim to only improve those areas which added the most value to the food manufacturing community. The other aim was to ensure that the standard was “future-proofed” against GFSI requirements. Many key areas such as product categories and audit duration have not, for the moment, been changed.

Given recent changes in other GFSI schemes a key question was the thorny issue of mandatory unannounced audits. In conjunction with stakeholders BRC took the decision not to insist upon unannounced audits. However, supermarkets and other clients may insist upon unannounced audits. For example, in the UK Wal Mart’s subsidiary, Asda, introduced a policy whereby all suppliers must undergo full (option 1) unannounced audits. Time will tell whether this will become common practice in North America.

At the end of an audit manufacturing sites are very keen to know what grade they got. Accreditation rules mean that auditors cannot discuss this at the closing meeting, but sites are left with a summary of non-conformances and using the table in section 2.4 at the back of the standard they can see what their certificate will say, assuming satisfactory closure of all non-conformances. Here Issue 7 has a surprise – a brand new grading and corrective action assessment grid. The highest grade is now AA followed by A, B, C and D. If an audit is unannounced the grade is followed by a + so AA+ etc. The highest grade is reserved for those sites with 5 or fewer minor-non-conformances. Grade A is now 6-10 minor non-conformances and grade D has been introduced with a combination of major and minor non-conformances. In Issue 7 only grade D sites require a revisit to close out non-conformances and both grade C and D sites have a 6 month validity on their certificate compared to 12 months for grade AA, A and B sites. These are substantial changes compared to Issue 6 of the standard and it will be interesting to see if any retailers or other major stakeholders in the industry insist upon their suppliers gaining the highest grade – AA.

A feature of the BRC Food standard is the concept of “Fundamental Requirements”. These are areas which are felt to be critical to food safety and quality and any major non-conformance against the Statement of Intent (the headline clause) prevents certification. There are now 12 Fundamental Requirements which include the 2 new clauses added to this list in Issue 7 – Management of Suppliers and Labelling and Pack Control. All Fundamental Statements of Intent are marked with a star and there is a summary list in Part 2 – Requirements.

Management of Suppliers has been rewritten significantly. To a certain extent the requirements now mirror those of HACCP. The best way to think of it is as a series of steps. First a company is expected to conduct a hazard analysis of each raw material (or group thereof) and packaging taking into account all the usual suspects (allergens, micro contamination etc) including a new theme for BRC 7 – substitution or fraud (on which more later). Next a company needs to risk assess their suppliers using this information and decide their risk profile (e.g. high, medium, low). This risk profile will inform the final stage which is the gathering of supplier assurance

evidence. Companies have a range of options open to them – independent certification (e.g. GFSI); supplier audits (second or third party) and for low risk suppliers only – questionnaires. A challenge for North America is that the above does not take into consideration letters of guarantee. A completely new clause requiring the identification of the manufacturer for anything that has been supplied by an agent or broker has been inserted. This is a significant change and so the BRC has stated that they expect full compliance from 1 July 2016 to allow for the necessary discussions to take place between manufacturers and their agents.

Traceability has a new clause for those suppliers deemed low risk who are approved via questionnaire. These suppliers need to demonstrate that they have a functioning traceability system once every 3 years. These suppliers can give their customers a generic traceability exercise – there is no need for a customer specific exercise to be performed.

Customer Focus and Communication is a new clause which simply requires that any customer policies are properly communicated within the company. The high risk and high care site layout and staff changing requirements have been clarified making them easier to implement and audit against. There are new requirements for ambient high care products (peanut butter, chocolate manufacture etc). Guidance is given in Appendix 2. Management of surplus food has been considered for the first time, clarifying the requirements for anything donated to food banks etc.

Product Authenticity, Claims and Chain of Custody is the revamped Provenance, assured status and claims of identity section which currently exists in Issue 6 of the standard. The model of requirements here is similar to that put in place for Management of Suppliers, discussed above. Companies are expected to gather information regarding historical and developing threats to their supply chain; use this information to develop a threat assessment (TACCP or CARVER-SHOCK for example) and put in place assurance or testing regimes to mitigate these threats.

Labelling and Pack Control has been made more robust with significant checking and verification requirements. It is also a requirement that only the packaging for immediate use shall be available on the line – no “staging” permitted. Any on-line vision equipment should be correctly set-up and sites should prepare themselves for this system to be challenged during the audit.

All of the training requirements have now been consolidated in one section of the standard. Companies should take care and read the standard thoroughly, there are some small but significant changes in wording. For example, internal audits should now take place “throughout the year” which may pose a challenge for those sites accustomed to conducting one big audit every year. There are also changes regarding the rules regarding use of the BRC logo.

The BRC have also developed an Additional Voluntary Module (AVM) on Traded Goods. These are products which are received and despatched by the facility being audited but are never opened, e.g. canned goods. It is expected that this is the first in a series of AVMs which will meet customer requirements. The Traded Goods module is expected to take an hour to audit.

All BRC standards are now free to download from [www.brcbookshop.com](http://www.brcbookshop.com) and there is the useful subscription service at [www.brcparticipate.com](http://www.brcparticipate.com). All audits conducted from 1 July 2015 will be against Issue 7 of the standard.

By: Siarl Dixon, for Lumar Food Safety Services Ltd.



416-414-2314

[www.lumarfoodsafetyservices.com](http://www.lumarfoodsafetyservices.com)