BRC ISSUE 8

The Changes You Need to Know About

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BRC GLOBAL STANDARDS

alchemy WEBINAR

Today's Speakers

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Agenda

1. BRC Global Standards for Issue 8
2. Key Updates to Requirements
3. Key Changes to Protocol
4. Available Resources
5. Questions?

BRC Global Standards Issue 8

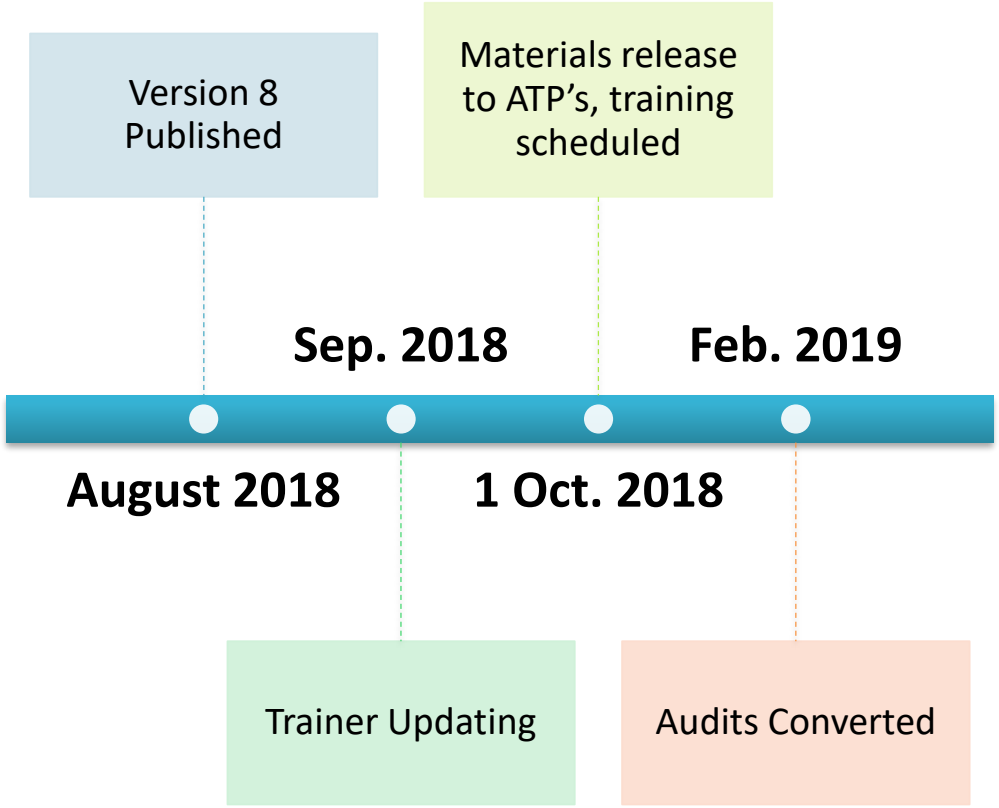
Background to Issue 8

The consultation and review of emerging food safety concerns identified a number of opportunities for further development since the publication of Issue 7.

Therefore the key objectives were identified as:

- Align Issue 8 with the proposed GFSI benchmark requirements
  - Environmental monitoring
  - Food defense/product security
- Continue activities to reduce the burden of duplicate, private audits of certificated sites
- Consider any potential implications of the US Food Safety Modernization Act (FSMA) requirements
- Consider the practicalities of including product safety culture within the Standard
- Review of the scope of the Standard
- Review issues, incidents & recalls
  - Product labelling

Food 8 Timing



Key Updates to the Requirements

Management Commitment

INCREASED IMPORTANCE AND FOCUS DURING THE AUDIT

INTERVIEWS WITH SENIOR MANAGEMENT

FOOD SAFETY AND QUALITY CULTURE AND OBJECTIVE SETTING

Food Safety Culture

- Background & Objective
  - Food safety culture is a fundamental factor in the management of product safety
  - While challenging to audit, it is important that food safety culture is considered within a site and therefore within the requirements of the Standard
- Requirements
  - Sites shall plan to maintain and develop product safety and quality culture within the business

Clause 1.1.2

- The site's senior management shall define and maintain a clear plan for the development and continuing improvement of a food safety & quality culture. This shall include:
  - Defined activities involving all sections of the site that have an impact on product safety
  - An action plan indicating how the activities will be undertaken and measured, and the intended timescales
  - A review of the effectiveness of completed activities

*Auditors will **NOT** be attempting to audit the culture of the site but will be looking at how sites have implemented the bullet points. Effectiveness will be assessed only on the 2nd Issue 8 audit.*

Reporting Issues

- Background & Objective
  - Product safety is the responsibility of the staff – not just a select few
  - All staff need to know how to report concerns and incidents
- Requirements
  - Clause **1.1.5** amended – staff understanding importance
  - Clause **1.1.6** added – confidential reporting system needed

Clause 1.1.5

- Requirements
  - The site shall have a demonstrable meeting program which enables food safety, legality, integrity and quality issues to be brought to the attention of senior management. These meetings shall occur at least monthly.
  - Employees shall be aware of the need to report any evidence of unsafe or out of specification product or raw materials, to a designated manager to enable the resolution of issues requiring immediate action.

Clause 1.1.6

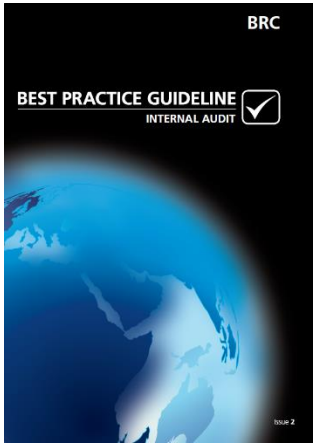
- The company shall have a confidential reporting system to enable staff to report concerns relating to product safety, integrity, quality and legality.
- The mechanism (e.g. the relevant telephone number) for reporting concerns must be clearly communicated to staff.
- The company's senior management shall have a process for assessing any concerns raised. Records of the assessment, and where appropriate actions taken, shall be documented.

HACCP/Food Safety Plan

- Background & Objectives
  - Some countries (e.g. the USA) have regulatory requirements that incorporate all HACCP processes outlines by Codex Alimentarius but use different terminology
- Requirements
  - Sites are required to meet the requirements of the Standard – specific terminology should not be an impediment to demonstrating compliance

Internal Audits

- Background & Objective
  - Internal audits are one of the most powerful tools that a site has
  - It is clear from the non-conformities raised and from our own compliance audits that many sites are still not effectively scheduling their internal audits throughout the year – where audits are only completed once or twice a year the system is more likely to lead to drops in standards between audits
- Requirements
  - Clause **3.4.1** amended to make sure that the safety management systems are being assessed in depth at regular intervals – at least 4 audits dates per year



Clause 3.4.1 Requirements

- There shall be a scheduled program of internal audits
- At a minimum, the program shall include at least 4 different audit dates spread throughout the year. The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All activities shall be covered at least once a year.

Clause 3.4.1 Requirements

- At a minimum, the scope of the internal audit program should include:
  - HACCP or Food Safety Plan, including activities to implement (e.g. supplier approval, corrective actions and verifications)
  - Prerequisite programs (e.g. hygiene, pest control)
  - Food defense and food fraud prevention plans
  - Procedures implemented to achieve the Standard
- Each internal audit within the program shall have a defined scope and consider a specific activity or section of the HACCP or food safety plan

Supplier Approval

- Background & Objective
  - Safety, integrity, legality and quality of raw materials are fundamental to the site's operations
  - GFSI benchmarking
- Requirements
  - All of the requirements reviewed and updated to ensure rigorous control controls of raw materials while maintaining practical application

Clause 3.5.1.1

The company shall undertake a documented risk assessment of each raw material or group of raw materials including primary packaging to identify potential risks to product safety, legality and quality. This shall take into account the potential for:

- **Allergen contamination**
- **Foreign-body risks**
- **Microbiological contamination**
- **Chemical contamination**
- **Variety or species cross-contamination**
- **Substitution or fraud (see clause 5.4.2)**
- **Any risks associated with raw materials which are subject to legislative control**

Consideration shall also be given to the significance of a raw material to the quality of the final product.

The risk assessment shall form the basis for the raw material acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.

The risk assessment for a raw material shall be updated:

- **When there is a change in a raw material, the processing of a raw material, or the supplier of a raw material**
- **If a new risk emerges**
- **Following a product recall or withdrawal, where a specific raw material has been implicated**
- **At least every 3 years**

Primary Packaging

- The packaging which constitutes the unit of sale to the consumer or customer (e.g. bottle, closure and label of a retail pack or a raw material bulk container)

Clause 3.5.1.2

The company shall have a documented supplier approval procedure to ensure that all suppliers of raw materials, including primary packaging, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval procedure shall be based on risk and include one or a combination of:

1. Valid certification to the applicable BRC Global Standard or GFSI-benchmarked standard. The scope of the certification shall include the raw materials purchased

OR

2. Supplier audits, with a scope to include product safety, traceability, HACCP review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor. Where this supplier audit is completed by a second or third party, the company shall be able to:
    - Demonstrate the competency of the auditor
    - Confirm that the scope of the audit includes product safety, traceability, HACCP review and good manufacturing practices
    - Obtain and review a copy of the full audit report

OR

3. For suppliers assessed as low risk only, and where a valid risk-based justification is provided, initial approval may be based on a completed supplier questionnaire, with a scope that includes product safety, traceability, HACCP review and good manufacturing practices. This questionnaire shall have been reviewed and verified by a demonstrably competent person.

Product Security & Food Defense

- Background & Objective
  - Rigorous food defense systems have gained renewed understanding and should form an integral part of factory protocol
  - Procedures adopted to assure the safety of raw materials and products from malicious contamination or theft
- Requirements
  - Threat (risk) assessments with actions (a plan) based on risk
  - Scope of the risk (threat) assessment the same as the process flow diagram (clause 2.5) i.e. all stages when product is under the management control of the site

Clause 4.2.1 – 4.2.4 Requirements

4.2.1	The company shall undertake a documented risk assessment (threat assessment) of the potential risks to products from any deliberate attempt to inflict contamination or damage. **This threat assessment shall include both internal and external threats.** The output from this assessment shall be a documented threat assessment plan. This plan shall be kept under review to reflect changing circumstances and market intelligence. It shall be formally reviewed at least annually and whenever: • A new risk emerges (e.g. a new threat is publicised or identified) • An incident occurs, where product security or food defence is implicated.
4.2.2	Where raw materials or products are identified as being at particular risk, the threat assessment plan shall include controls to mitigate these risks. Where prevention is not sufficient or possible, systems shall be in place to identify any tampering. These controls shall be monitored, the results documented, and be subject to review at least annually.
4.2.3	Areas where a significant risk is identified shall be defined, monitored and controlled. These shall include external storage and intake points for products and raw materials (including packaging). Policies and systems shall be in place to ensure that only authorised personnel have access to production and storage areas, and that access to the site by employees, contractors and visitors is controlled. A visitor recording system shall be in place. Staff shall be trained in site security procedures and food defence.
4.2.4	Where required by legislation, the site shall maintain appropriate registrations with the relevant authorities.

Physical Contaminants

- Background & Objective
  - Obviously vital that physical contamination of products is prevented
  - Historically, the Standard has predominantly focused on metal detection
  - There are some know potential contaminants that need site management
- Requirements
  - Contamination of products or raw materials from packaging materials e.g. during deboxing or debagging
  - Control of pens e.g. exclusion of pens with small detachable parts and detectable by foreign body detection equipment

Other Physical Contaminants

- **4.9.6.1**
  - Procedures shall be in place to prevent physical contamination of raw materials from raw material packaging (e.g. during debagging and deboxing procedures to remove the packaging)
- **4.9.6.2**
  - Pens used in open product areas shall be controlled to minimize risk of physical contamination (e.g. designed without small parts and detectable by foreign body detection equipment)

Environmental Monitoring

- Objectives
  - Introduce an important tool for identifying potential contamination risks
  - Sites to develop a rigorous monitoring program, enabling timely corrective action before product contamination occurs
- Requirements
  - Monitoring of all factory production areas as a minimum area with open ready to eat products
  - Risk based program developed
  - Pathogens, spoilage organisms and/or indicator organisms should be considered

4.11.8 Environmental Monitoring

- Risk-based environmental monitoring programs shall be in place for pathogens or spoilage organisms. At a minimum, these shall include all production areas with **open & ready-to-eat products**
  - **4.11.8.1** – Program designed properly
  - **4.11.8.2** – Appropriate limits and corrective actions
  - **4.11.8.3** – Review triggers

Clause 4.11.8.1 Requirements

- The design of the environmental monitoring program shall be based on risk, and as a minimum include:
  - Sampling protocol
  - Identification of sample locations
  - Frequency of tests
  - Target organisms
  - Test methods (e.g. settle plates, rapid testing, swabs)
  - Recording and evaluation of results
- The program and associated procedures shall be documented

Clause 4.11.8.2 Requirements

- Appropriate control limits shall be defined
- The company shall document the corrective action to be taken when monitored results indicate a failure to meet a control limit, or when monitored results indicate a trend of increasing positive environmental results

Clause 5.6.2.5 Requirements

- The significance of laboratory results shall be understood and acted upon accordingly
- Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends
- Where legal limits apply these shall be understood and appropriate action implemented promptly to address any exceedance of these limits

Clause 4.11.8.3

- The company shall review the environmental monitoring program at least annually and whenever:
  - Changes in processing conditions, process flow or equipment
  - New developments in scientific information
  - Failure of the program to identify a significant issue (e.g. regulatory authority testing identifies positive results which the site program has not)
  - Product failure (products with positive tests) that are not identified in the environmental monitoring program (i.e. if product tests give positive pathogen results then the program should be reviewed to ensure that it remains effective)
  - Extensive lack of positive results (i.e. a site with a long history of negative results should review the program, for example to consider whether the correct parts of the factory are correctly tested, for the appropriate organisms, etc.)

Production Risk Zones

- Objective
  - To promote understanding and best practice for the manufacture of products that require high risk, high care or ambient high care areas.
  - Review the requirements to ensure practical application without reducing the effectiveness of the current requirements
- Requirements – largely unchanged from Issue 7 to Issue 8
  - Equipment received back following maintenance
  - Waste management
  - Portable equipment
- Requirements have been relocated into a single, newly created, section of the Standard (section 8)
- Protocol and definitions reviewed and update for increased clarity

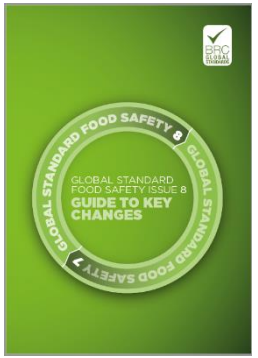
Key Changes to the Protocol

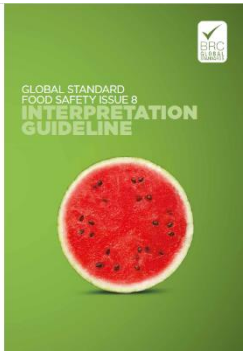
Interim Reporting

- Background
  - One of the consistent concerns raised by key stakeholders (e.g. customers, certified sites, regulators) is the time gap between audit and confirmation of certification (certification & audit report)
- New Protocol
  - Following each audit an ‘interim’ report shall be available on the BRC Directory within 10 calendar days
  - Contents strictly limited to date of audit, details of the audit scope and the non-conformities found
  - Final audit report will still be available after 42 days – currently being designed

Where to find help?

- Interpretation Guideline
- Key Changes Document
- FAQs – Published October onwards
- ‘Understanding’ Guidelines (22 for Issue 8)





Your Training Options

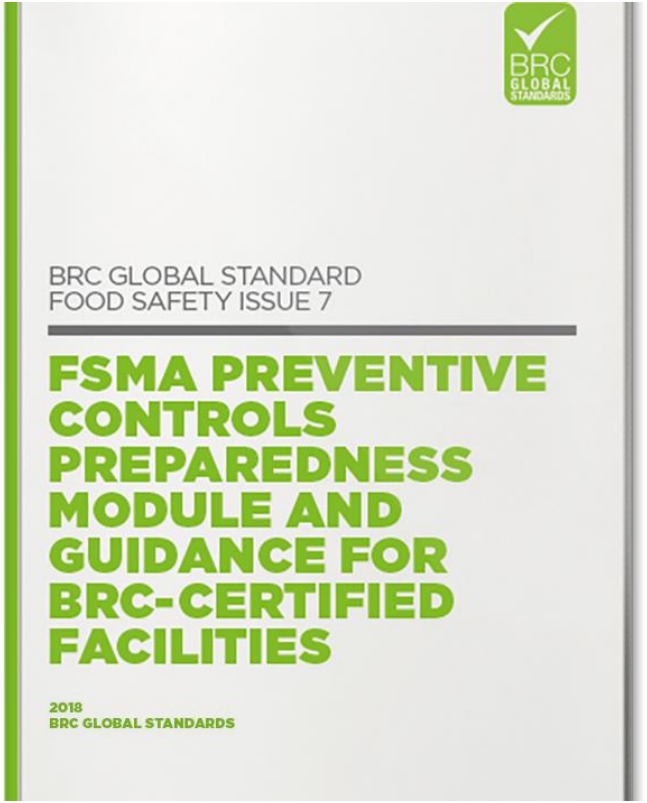
Target Audience	Course	Duration
Existing Food 7 ATP's	Food 7-8 Conversion for Trainers	3 Days
New ATP's	Food 8 TTT	4 Days
Existing Food 7 Auditors	Food 7-8 Conversion for Auditors	2 Days
New Auditors	Food 8 Lead Auditor	5 Days
New Auditors with Lead Status	Food 8 Auditor	3 Days
Sites	Food 7-8 Conversion for Sites	1 Day
Sites	Food 8 Sites	2 Days

Global Markets – Food Targeting

- New auditor requirements
  - Field of Audit, no categories
  - 2 years experience
  - 2 training audits
- Reduced cost
- New protocol
  - Auditors able to provide guidance for improvement
- Launch late September

FSMA Module

- Active August 2018
- Most used module ~ 500 sites



Available Resources

FOOD SAFETY AMERICAS 2019

CONSUMING CHALLENGES

MAY 21-22, 2019

Loews Coronado Bay, San Diego, California

brcglobalstandards.com/events

Alchemy Helps Ensure BRC Certification

- **Train** your employees with multilingual courses
- **Reinforce** food safety fundamentals with huddle guides and signage
- Use **reinforcement** elements to drive continuous improvement with an on-the-job coaching app
- **Compliance!** Stay audit-ready with automatic documentation and real-time reporting to

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Alchemy Consulting Services for BRC Issue 8

BRC Issue 8 Conversion Service

- Ready your facility & documentation with laser-focused consulting on what's new and updated in BRC Issue 8.

BRC Issue 8 Audit Readiness Assessment

- Dot all your i's and cross all your t's for every aspect of a BRC audit under Issue 8.

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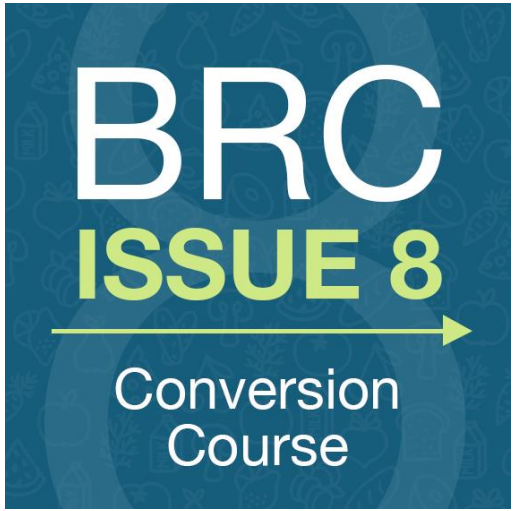
BRC Conversion eLearning Course



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