BRCGS Standard for Agents and Brokers Position Statements for Issue 2

Document Scope:

During the lifetime of a published Standard the BRCGS Technical committee may be asked to either review the wording of a clause in the Standard, provide an interpretation for a requirement or rule on the grading of non-conformity against a clause. Any such judgements are defined in position statements. Position statements are binding on the way that the audit and certification process shall be carried out and are an extension to the Standard. This document contains a summary of the position statements for the BRCGS Standard for Agents and Brokers Issue 2.

Change log:

Version no.	Date	Description
1	June 2018	Position statement to allow limited exclusions from scope for audits against Issue 2 of the Global Standard for Agents & Brokers
2	September 2018	Position statement to allow accommodate the requirements of GFSI Benchmark 7.2 into A&B Issue 2.
3	12/08/2019	New BRCGS logo and footer changed
4	9/11/2020	Addition of updated positions to meet the GFSI Benchmark 2020.

1. Exclusions from scope

Issue 2 of the Global Standard for Agents & Brokers states (Protocol section 1.6.2):

'The fulfilment of the certification criteria relies on clear commitment from the company management to adopt the best-practice principles outlined within the Standard and to develop a product safety culture within the business. There is often an assumption by customers that where a certificate has been issued to a company's office, all products and not just a selection of products have been included within the scope of the certificate. It follows, therefore, that the exclusion of products or services provided by a certificated office shall not be permitted.

Certificates are issued to the company for specific office locations. It is permissible for a company to have some offices certificated under the scheme and other offices not included in the scheme.'

However, this has created an unexpected challenge for sites and certification bodies as Issue 2 expanded the scope of the Standard to include food, packaging and consumer products, which means that where a site's product range includes all of these product types, the certification bodies are responsible for identifying and training an auditor (or auditors) with experience of all three of these product types (Issue 2 Appendix 4). This has two consequences:

- Certification bodies have to send multiple auditors to relatively small companies (e.g. one auditor approved for food safety, another for packaging materials and a third for consumer products)
- Certification bodies having to delay or postpone audits due to a limited number of auditors approved for the completion of consumer products audits

In order, to prevent these challenges BRCGS will permit a site to exclude a type of product (e.g. consumer products). It is only permitted to exclude the entire type of product, it is not acceptable to include some food products in scope and exclude other food products, or to include some consumer products and exclude other consumer products. For example, the site must either have a scope which includes all food products and all consumer products, or one that includes all food products and excludes all consumer products, or one that excludes all food products and includes all consumer products.

The scope must include the entire type of product (e.g. all food products), and therefore it is not permitted to include chilled and frozen foods but exclude ambient foods.

The audit report and certificate shall accurately reflect any exclusions from scope. On the certificate, certification bodies shall add additional text under product categories e.g.:

For the scope:	Broker for dried fruit and prepared fresh fruit
Product categories:	Chilled and frozen food Ambient food
Exclusions from scope:	Broker for paper and textile products

A new audit report template is available on the BRCGS Directory which includes exclusions from scope. The report template should be used for all audits from 1st August 2018 onwards.

Issued 13/06/2018

GFSI Benchmarking Requirements Version 2020

Issue 2 of the Global Standard for Agents and Brokers has been benchmarked to the GFSI Benchmark since April 2018. However, subsequent to the benchmarking, GFSI have published several updates, and the current version is Benchmark 2020.

For the Standard to maintain its benchmarked status, it is important that the Standard completely meets the GFSI document and it is therefore necessary to add a requirement and amend several requirements (all shown below) to ensure certificated sites complete all the activities required by the new GFSI benchmark.

These changes will be included in all audits from 1st February 2021 onwards:

2. Product Safety and Quality Culture

NEW REQUIREMENT

Clause	Requirements

1.1.12	The site's senior management shall define and maintain a clear plan for the development and continuing improvement of a product safety and quality culture within the company. This shall include:
	• defined activities involving all sections of the company that have an impact on product safety and quality. As a minimum, these activities shall be designed around:
	  ◦ communication within the supply chain and within the company
	  ◦ training
	  ◦ feedback from employees
	  ◦ performance measurement on product safety and quality related activities
	• an action plan indicating how the activities will be undertaken and measured, and the intended timescales
	• a review of the effectiveness of completed activities.

Interpretation	A proactive, positive culture within a company can make all the difference in the effectiveness of the product safety and quality plan and its consistent implementation throughout the site. Culture relies not just on measurables and specifics, but an ethos and values felt by people at all levels of the site. The size and complexity (or simplicity) of the company should not be a barrier to a successful culture, although it is likely to influence the activities incorporated into the product safety and quality culture plan. For example, in a small company with 2 – 3 staff, communications and staff feedback will probably be conducted differently from a company of 50+ staff. In the later case an information 'cascade' and notice boards are likely to feature, whereas small companies are more likely to use more informal approaches such as 'huddles'. The Standard is not prescriptive on the methods of communication used, or the format of the evidence to demonstrate compliance. For example, it may include: minutes of formal meetings, items previously, or currently, displayed on notice boards, a meeting agenda with a note of any items actioned, communications strategy with the supply chain and evidence of such communications. It should be remembered that relevant communication should relate to items that have impact on product safety and quality, although internally it may also include communication of activities relating to the improvement of product safety culture. The company is required to develop and implement a clear plan or programme for developing and improving its product safety culture. Such a plan would be based on the nature of the organisation, and dependent on its size, seasonality and the overall aims it has identified as important for its own culture. It is acceptable for the plan to cross-reference other workstreams where these are operating, for example, a company may already be operating an effective personal development plan which can be incorporated into the culture plan. The plan does not need to be annual. A strategic plan could, for example, cover 5 years, with activities each year designed to measure current culture, implement changes and/or assess improvements (or where improvement was not evident, a review of why). Some aspects of the plan may occur more frequently than others and the tools, metrics and measures for monitoring the plan should be demonstrable. The auditor will expect to find evidence of a plan with objectives, and evidence of the company completing the activities in its action plan. This will be determined through interviews and by viewing objective evidence of the steps taken. The final bullet point in the clause requires company to undertake a review of the effectiveness of completed activities. However, as audits to this requirement only commence in February 2021 it is possible that this review of the success of the programme, will not always be implemented in year 1 and therefore non-compliance with this bullet point is not considered a non-conformity until the company's first audit to Issue 3.

3. Hazard and Risk Assessment

AMENDED REQUIREMENT

The existing Statement of Intent (SOI) for Section 2 states:

> The company shall operate a product safety plan for the processes for which it is responsible. This shall be based on the principles of hazard and risk analysis, and shall be documented, systematic, comprehensive, fully implemented and maintained.

For all audits from 1st February 2021 this requirement will be replaced by:

> The company shall operate a product safety plan for the processes for which it is responsible. This shall be based on the principles of hazard and risk analysis including the Codex Alimentarius HACCP principles. The plan shall be documented, systematic, comprehensive, fully implemented and maintained.

Interpretation

The clauses within section 2 of the Standard have always been based on the Codex Alimentarius HACCP principles. For clarity, this detail has now been added to the Statement of Intent.

Specific terms (such as prerequisites or critical control points) are drawn from global terminology to describe expectations. Sites are not required to amend the specific terminology used in their hazard and risk assessments as a result of this change to the Statement of Intent. Alternative terminology is acceptable, providing it is evident that all the requirements have been fully met. For example, legislative requirements in the US (detailed in the Food Safety Modernization Act) use different terminology but still incorporate all the requirements of the Standard.

4. Incident Management

AMENDED REQUIREMENT

The existing clause states:

Clause	Requirements
3.11.4	In the event of a product recall, the certification body issuing the current certificate for the company against this Standard shall be informed within 3 working days of the decision to issue a recall.

For all audits from 1st February 2021 this requirement will be replaced by:

Clause	Requirements
3.11.4	The certification body issuing the current certificate for the company shall be notified within 3 working days of any significant product safety incident affecting a product traded by the company. This may include a product recall or regulatory product safety non-conformity (e.g. a regulatory enforcement notice).

Interpretation
The aim of this notification is to ensure that the integrity of the certificate is maintained by allowing the certification body to assess whether the incident affects the certification status of the site. Therefore, the certification body needs to be notified of all significant food safety incidents (including all product recalls and regulatory food safety enforcement actions) relating to product that is traded by the company. Where appropriate, the certification body can request further information or conduct a full or partial re-audit of the site to confirm certification.

It is important that action is taken in a timely manner (i.e. within 3 working days). There is no requirement to notify the certification body of a product withdrawal.

5. Supplier Approval – Product Security (Food Defence) Plan and Product Authenticity Plan

AMENDED REQUIREMENT

The existing Position Statement for clause 4.1.2 states:

4.1 Approval and performance monitoring of manufacturers/packers of traded products

Clause	Requirements
4.1.2	The process for the initial and ongoing approval of manufacturers of products shall be based on risk. It shall include one or a combination of the following: • Valid certification of the manufacturing or packing site to the applicable BRC Global Standards or a standard benchmarked by the Global Food Safety Initiative (GFSI). The scope of the certification shall include the products traded by the agent or broker. • A supplier audit with a scope to include product safety, traceability testing, HACCP or hazard and risk management review, the product security (food defence) plan, the product authenticity plan and good manufacturing practices. This shall be undertaken by an experienced and demonstrably competent product safety auditor. For products (food or non-food) assessed as low-risk only, and where a valid risk-based justification is provided, initial and ongoing approval maybe based on a completed manufacturing site questionnaire. As a minimum the questionnaire must demonstrate that the supplier has effective action plans to control product safety, product security (food defence) and product authenticity. The questionnaire shall be reviewed and verified by a demonstrably competent person. For non-food products assessed as low-risk only, and where a valid risk-based justification is provided, initial and ongoing approval may also be based on at least one of the following: • a legally enforceable contract/specification from the supplier • a historical trading relationship, supported by documented evidence of performance reviews that demonstrate satisfactory performance. This clause may not be applicable where it is a customer requirement that products are supplied by a specific manufacturer and the liability is with that

	customer. A record of the customer's requirement for the use of a specific supplier shall be maintained.

For all audits from 1st February 2021 this requirement will be replaced by:

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Interpretation	In addition to the guidance provided in the Interpretation Guideline for clauses 4.1.2 and 4.8.2 which remain relevant to the amended clause, the following should be considered: Each supplier must undertake risk assessments of the potential risks to the products and have appropriate controls in place to mitigate identified risks. These risk assessments must form part of the supplier's product safety management systems. This includes during manufacture, processing, packing and where part of the process, storage and transport. The management of these risks is already assessed by the agent or broker during the supplier approval process (for example, by

confirmation of certification status, by auditing the supplier or by obtaining sufficient information in a supplier questionnaire). In addition to product safety, traceability, HACCP (or hazard and risk management) and good manufacturing practices (which have always been part of the clause), the amended clause now identifies two additional risks that must be considered:

- product security (food defence) – often referred to as a threat assessment
- product authenticity (food fraud) – often referred to as a vulnerability assessment

The output from the supplier's assessments will be a documented threat assessment plan and a documented fraud mitigation plan (a combined plan is acceptable providing it appropriately assesses all of the relevant risks).

Where products are identified as being at particular risk, the plan must also include details of controls implemented by the supplier to mitigate the identified risks.

Where a supplier is certificated to a BRCGS Standard or a GFSI benchmarked standard, they will already be required to have these assessments in place by that standard (for example, sections 4.2 and 5.4 of the BRCGS Standard for Food Safety), and therefore no additional action is required by the agent or broker as the certificated supplier's threat assessment and fraud mitigation plans are audited as part of the certification audit. However, where the supplier is not certificated, the agent or broker will need to obtain sufficient information to ensure these assessments are completed and that any identified controls or activities are implemented ~~in place~~, and therefore the supplier approval, audit scope and/or questionnaire will need to include this.

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