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Issue 2
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How this publication is organised?

This publication sets out the requirements for auditing and certification of agents and brokers to achieve certification for the *Global Standard for Agents and Brokers*.

The document consists of the following sections:

Section I Introduction

Provides an introduction and background to the development, scope and benefits of the Standard.

Section II Requirements

Details the requirements of the Standard with which a company must comply in order to gain certification.

Section III The Audit Protocol

Provides information on the audit process and rules for the awarding of certificates. This section also provides information on marketing support for certificated companies, the logos and the BRC Directory.

Section IV Management and Governance of the Scheme

Describes the management and governance systems in place for the Standard and for the management of certification bodies registered to operate the scheme.

Appendices

Appendices 1 to 7 provide other useful information, including auditor competency requirements and a glossary of terms.

Section I – Introduction

1 Background

Welcome to the second issue of the *Global Standard for Agents and Brokers* ('the Standard'). Originally, developed and published in 2014, the Standard has been updated to reflect the current thinking in product safety, to expand the scope to incorporate consumer products and to encourage adoption of the Standard worldwide. The Standard provides a framework to manage product safety, quality and legality for businesses in the food, packaging and consumer products industries which buy, sell or facilitate the trade of products, but who do not manufacture, process or store products in their own facilities or on their own site. These companies play an essential role in the movement and trade of products, providing a critical link in their chain of custody. They can influence product safety and quality standards at their suppliers and are responsible for maintaining an effective chain of traceability. Where activities include importation there are in many cases specific legal obligations with regard to the products which they import and requirements to maintain records which may later be requested by authorities or customers.

Certification against the BRC Global Standards is recognised by many retailers, food service companies and manufacturers around the world when assessing the capabilities of their suppliers. This Global Standard has been developed to specify the safety, quality and operational criteria required to fulfil obligations with regard to legal compliance and protection of the consumer or end user of the product. The format and content of the Standard is designed to allow an assessment of a company's product safety management systems and procedures by a competent third party – the certification body – against the requirements of the Standard.

2 The Scope of the *Global Standard for Agents and Brokers*

The *Global Standard for Agents and Brokers* sets out the requirements for companies in the food, packaging and consumer products supply chain that buy, sell or facilitate the trade of products and may provide additional services such as the purchase, importation or distribution of the products, but do not manufacture or process those products.

The scope of certification shall cover **all** applicable operations at the office certificated.

2.1 The scope of the Standard requirements

The Standard has a scope which is limited to product safety, quality and legality.

It defines requirements for the systems of operation and services to ensure this.

The Standard does not cover other activities such as environmental, ethical or financial arrangements which may be covered by other certification schemes.

2.2 The scope of companies that may be certificated to the Standard

The Standard may be used by companies operating the following services:

- Brokers – companies that purchase or 'take title to' products for resale to manufacturers, other brokers, retailers or food service companies but do not directly sell to the consumer.

- Agents or non-manufacturing service providers – companies that trade between a manufacturer or broker and their customer but do not at any point own or take title to the goods. Such companies provide a range of services to facilitate the safe and legal trade of products.

Companies may also offer their customers additional services such as sub-contracted storage, distribution or product processing or facilitate the import/export of products across national or international boundaries.

Where a company has an office location that carries out service functions (eg product inspection or import processes) but don't actually complete the trade of the product, then this office can be included within the scope of the audit providing the office is not within the scope of another BRC Standard (eg product storage which would be included within the BRC Standard for Storage and Distribution).

2.3 The scope of products applicable for certification

The Standard has a scope which covers certification for the following categories of products:

- food products, including raw materials, processed foods, and fruit and vegetables
- packaging materials – primary, secondary and tertiary materials, and raw materials for the manufacture of packaging materials
- pet foods for domestic animals.
- consumer products

The Standard shall not apply to:

- Livestock
- animal feed for livestock.

3 The *Global Standard for Agents and Brokers* and its Relationship with Other BRC Global Standards

BRC Trading Limited has developed a range of Global Standards which set out the requirements for the manufacture of food and consumer products, the packaging used to protect the products, and the storage and distribution of these products. These BRC Standards complement the *Global Standard for Agents and Brokers* providing full certification throughout the supply chain.

The BRC *Global Standard for Food Safety* is a certification standard for the manufacture and packing of food and drink products. It sets out requirements based on the HACCP (Hazard Analysis and Critical Control Point) system, good manufacturing practice and supporting quality management systems. The Standard is Global Food Safety Initiative (GFSI) benchmarked.

The BRC *Global Standard for Packaging and Packaging Materials* is a GFSI-benchmarked certification standard that lays down the requirements for the manufacturing of packaging materials used for food and consumer products at any level. Food and consumer products businesses may request this certification from their suppliers of packaging.

The BRC *Global Standard for Storage and Distribution* is a certification standard that sets out the requirements for the storage, distribution, wholesaling and contracted services for packaged food products, packaging materials and consumer goods. The standard is not applicable to storage facilities under the direct control of the production facility management, which are covered by the relevant manufacturing standard, e.g. the *Global Standard for Food Safety*.

The BRC *Global Standard for Consumer Products* is a certification standard applicable to the manufacture and assembly of consumer products. To reflect the needs of the market, it is composed of two separate Standards: Personal Care and Household, and General Merchandise. Each Standard sets out the requirements for the manufacture of relevant non-food, consumer products including the manufacture of raw materials and components as well as finished products. Certification to the BRC Standard for Consumer Products can be at two levels: foundation and higher.

The BRC *Global Standard for Retail* is a certification standard that sets out the requirements to manage product safety, quality, and legality for businesses in the food retail industry. The scope of certification covers applicable operations both at the head office and at retail stores.

4 Product Safety Legislation

The Standard is intended to assist companies and their customers in meeting the legislative requirements for product safety. Legislation covering product safety differs in detail depending on the product type and the geographic location but generally requires businesses to:

- ensure the presence of a detailed specification which is lawful and consistent with compositional and safety standards for the products concerned and follows good manufacturing practice
- ensure they verify that their suppliers are competent to produce the specified product, comply with legal requirements and operate appropriate systems of management control
- verify the competence of their suppliers or receive the result of any other audit of the supplier's system at a frequency based on risk
- establish and maintain a risk-assessed programme for product examination, testing or analysis
- monitor and act upon customer complaints.

This Standard has been developed to support companies and their customers to meet these requirements.

5 The Product Safety Management System

5.1 Principles of the *Global Standard for Agents and Brokers*

The company must have a full understanding of the products being traded or covered by the services provided and have systems in place to identify and control hazards significant to the safety, legality or quality of the products. The *Global Standard for Agents and Brokers* is

based on three key components: senior management commitment; hazard and risk analysis – a step-by-step approach to managing product safety risks; and supplier and subcontracted service management.

5.2 Senior management commitment

Product safety must be seen as a cross-functional responsibility that may draw on many departments across an organisation. Product safety management extends beyond technical departments and must involve commitment from the full management team, including procurement, logistics and sales.

The starting point for an effective product safety plan is the commitment of senior management to the development of an all-encompassing policy as a means to guide the activities that collectively assure product safety. The *Global Standard for Agents and Brokers* places a high priority on clear evidence of senior management commitment.

5.3 A hazard-and-risk-analysis-based system

The Standard requires the development of a product safety plan covering the services/operations which the company manages or specifies and based on the principles of hazard and risk analysis. The development of the plan requires the input of all relevant departments and must be supported by senior management.

5.4 Supplier and subcontracted service management

The Standard is intended to provide assurance to customers of the management of product safety risks as products pass through the supply chain. A risk-based process is taken to ensure that products are produced by approved manufacturers following agreed specifications with a traceable and transparent supply chain. The selection and management of product manufacturers, subcontractors and service providers is key to the management of risk.

6 The Certification Process

The *Global Standard for Agents and Brokers* is a service certification scheme. In this scheme, businesses are certificated upon completion of a satisfactory audit by an auditor deployed by an independent third party – the certification body. The certification body in turn shall have been assessed and accredited by a national accreditation body to ISO/IEC 17065.

In order for a business to receive a valid certificate on completion of a satisfactory audit, the organisation must select a certification body approved by the BRC Global Standards. The BRC Global Standards lay down detailed requirements that a certification body must satisfy in order to gain approval. Approved certification bodies are listed in the BRC Directory at www.brcdirectory.com

7 Benefits of the *Global Standard for Agents and Brokers*

There are a number of benefits to companies arising from the adoption of the BRC Global Standards. The BRC Global Standards:

- are internationally recognised and provide a report and certification that can be accepted by customers in place of their own audits, reducing time and cost
- provide a single standard and protocol that govern an accredited audit by third-party certification bodies, allowing a credible independent assessment of a company's product safety and quality management systems
- allow certificated companies to appear in the public section of the BRC Directory, providing recognition of their achievements and use of a logo for marketing purposes
- are comprehensive in scope, covering areas of product safety, legal compliance and quality
- provide potential customers with confidence in the services provided, thereby facilitating trade
- are designed to support compliance with regulatory requirements being proposed in the US Food Safety Modernisation Act and EU legislative requirements
- require ongoing surveillance and confirmation of the follow-up of corrective actions on non-conformity to the Standard, thus ensuring that a self-improving quality and product safety system is established.

8 Effective Date of Issue 2

As with all revisions of the Global Standards, there must be a transition period between publication and full implementation. This allows time for the retraining of all auditors and allows certificated companies to prepare for the new issue of the Standard. Therefore, certification against Issue 2 will commence from February 2018. All certificates issued against audits carried out prior to this date will be against Issue 1 and be valid for the period specified on the certificate.

9 Acknowledgements: a 'Thank You' from BRC Global Standards

BRC Global Standards wishes to acknowledge all those industry experts who have contributed to the preparation of Issue 2 of the *Global Standard for Agents and Brokers*. A list of those who have contributed to the development of the Standard can be found in Appendix 7.

Section II
Requirements

Introduction to the Requirements

The format of the Standard

Each clause of the Standard begins with a highlighted paragraph in bold text, the 'statement of intent'. This sets out the expected outcome of compliance with the particular clause. This forms part of the audit and all companies must comply with the statement of intent.

Below this 'statement of intent', set out in a tabular format, are specific requirements which, if applied appropriately, will help to achieve the stated objective of the clause. The requirements shall form part of the audit and must be complied with, where applicable, in order for a certificate to be issued.

Non-applicable clauses

The requirements section of the Standard is based on good industry practice, such that certificated companies are able to demonstrate to customers their commitment, a structured approach to managing product safety and a controlling influence over the safety, legality and quality of the products covered by their services.

It is recognised, however, that the activities and services provided by brokers and agents or non-manufacturing service providers may vary considerably and that some of the services included within this Standard may not be offered by all companies applying for certification. Such services will be considered to be non-applicable and certification can still be provided on the basis of compliance with the remainder of the applicable requirements.

To ensure consistent understanding and application of the Standard, the sections which may be classified as non-applicable are identified by the background shading of the statement of intent. For example:

The clauses for statements of intent coloured as illustrated may be non-applicable to some organisations.

1. Senior Management Commitment

1.1 Senior Management Commitment and Continual Improvement	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company's senior management shall demonstrate that they are fully committed to the implementation of the requirements of the *Global Standard for Agents and Brokers* and to the operation of processes which facilitate continual improvement of their product safety and quality management services.**
1.1.1	The company shall have a documented policy which states the company's intention to meet its obligation to supply safe and legal products to the specified quality, and its responsibility to its customers. This shall be: • signed by the person with overall responsibility for the company • communicated to all staff.
1.1.2	The company's senior management shall ensure that clear objectives are defined to maintain and improve the services ensuring product safety, legality and quality in accordance with the quality policy and this Standard. These objectives shall be: • Documented and include targets or clear measures of success • Clearly communicated to relevant staff • Monitored and results reported at least six monthly to company senior management
1.1.3	Management review meetings attended by the company's senior management shall be undertaken at appropriate planned intervals, as a minimum annually, to review performance against the Standard and objectives set in 1.1.2. The review process shall include the evaluation of: • previous management review action plans and timeframes • results of internal, second party and/or third party audits • customer complaints and results of any customer performance reviews • incidents, corrective actions, out of specification results and non-conforming materials • review of supplier performance • review of the management of the systems for hazard and risk assessment (eg food safety system, HACCP or HACCP based plan), food defence/product security and authenticity of products • resource requirements. Records of the meeting shall be kept and documentation shall be used to revise the objectives encouraging continuous improvement. The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff, and actions implemented within agreed time scales.
1.1.4	The company shall have a demonstrable system which ensures that significant product safety, legality and quality issues are brought to the attention of senior management to allow for the resolution of issues requiring immediate action.
1.1.5	The company's senior management shall provide the resources required to ensure the product safety, legality and specified quality of products supplied in compliance with the requirements of this Standard and its customers.
1.1.6	The company's senior management shall have a system in place to ensure that the company is kept informed of and reviews any emerging product safety, product authenticity, quality or legality issues, industry Codes of Practice and all relevant legislation applicable in the country where the product is intended to be sold.
1.1.7	Where required by legislation, the company shall be registered with, or be approved by, the appropriate authority.
1.1.8	The company shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRC website.
1.1.9	Where the company is certificated to the Standard it shall ensure that announced recertification audits occur on or before the audit due date indicated on the certificate.

1.1.10	The opening and closing meetings of the audit for this Standard shall be attended by a senior manager of the company. If the most senior manager within the company is absent on the day of the audit due to other commitments, a nominated deputy must be available (refer to clause 1.2.1).
1.1.11	The company's senior management shall ensure that the root cause of non-conformities identified at the previous audit against the Standard have been effectively addressed to prevent recurrence.

1.2 Organisational Structure, Responsibilities and Management Authority	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company shall have a clear organisational structure and lines of communication to enable effective management of services ensuring product safety, legality and quality.**
1.2.1	The company shall have an organisation chart demonstrating the management structure of the company. The responsibilities for the management of activities that ensure product safety, legality and quality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.
1.2.2	The company's senior management shall ensure that all employees are aware of their responsibilities. Employees whose role or activity could affect product safety, integrity, legality or quality, shall have access to documented work instructions or procedures and be able to demonstrate that work is carried out in accordance with the instruction.

2 Hazard and Risk Assessment

Requirement no.	**REQUIREMENT**
Statement of intent	**The company shall operate a product safety plan for the processes for which they are responsible. This shall be based on the principles of Hazard and Risk analysis, which shall be documented, systematic, comprehensive, fully implemented and maintained.**
2.1	The person responsible for leading the hazard analysis shall be able to demonstrate competence in the understanding of hazard and risk analysis principles (eg HACCP principles) and their application. Where a team is used the team members shall have knowledge of the hazard and risk analysis principles. In the event of the company not having appropriate in house knowledge, external expertise may be sought but the day to day management of the product safety system shall remain the responsibility of the company.
2.2	Where the hazard and risk analysis study has been undertaken centrally it shall be possible to demonstrate that the study has been verified to meet the specific activities of the local operations to which the study applies.
2.3	The hazard analysis, and resulting procedures, shall have senior management commitment, and shall be implemented through the company's documented Product Safety and Quality Management Systems.
2.4	The company shall define the scope of the hazard and risk analysis in terms of the products and services that are included. This shall include: • a description of the nature of products traded (for example canned fish, fresh produce, corrugated board, household chemicals such as bleach, cosmetics, household electric goods) and any particular specified storage or handling conditions (for example temperature control requirements, propensity to water damage etc.)

	• A description of any services provided directly or arranged whilst the product is under the responsibility of the company.
2.5	A process flow diagram shall be prepared to cover each step in the process from the purchase or acceptance of responsibility for products to acceptance of the products by the company's customer. As a guide this should include the following where applicable: • Importation/export processes • Product checks or testing • Subcontracted transport or distribution • Subcontracted storage of products • Processes for damaged or rejected product • Any subcontracted processes undertaken on products (e.g. relabelling, further processing).
2.6	The company shall identify and record all potential hazards associated with each step of the product flow. The company shall include consideration to the following types of hazard: •.....microbiological growth (e.g. resulting from temperature abuse of products that require temperature control or exposure of unpacked products to environmental micro-organisms such as pathogens) • physical contamination (e.g. glass contamination, wood splinters from pallets, dust, pests) • chemical or radiological contamination (including product tainting) • physical damage (e.g. breakage, puncturing of packaging, water damage, electrical faults) • Fraud e.g. substitution or deliberate/intentional adulteration • Malicious contamination of products • Allergens (e.g. cross-contamination during storage or transportation of open product in silos or tankers) • Hazards impacting the functional integrity and performance of the product during use • any other hazards mandated by the customer or relevant regulatory authorities
2.7	The company shall complete a documented risk analysis of the potential hazards in order to identify which need to be controlled. The following should be considered: • the likely occurrence of the hazard, • the severity of the hazard (e.g. injurious to health, potential to cause food-poisoning, rejection or a product recall) • existing pre-requisite programs which effectively prevent or reduce the hazard to acceptable limits.
2.8	For each hazard which requires control, processes shall be established to ensure that subcontracted service providers effectively manage their operations to prevent, eliminate or reduce a significant hazard to acceptable limits. Such processes may include: • Specifications and contracts with subcontracted service providers • Review of HACCP or hazard and risk management plans operated by service providers to confirm that the identified hazard is being controlled
2.8.1	Where controls are managed by HACCP or hazard and risk management plans operated by service providers, these shall be reviewed by a competent person to determine the effectiveness of the plans or be within the scope of an accredited certification of the service provider. Contracts or trading agreements must ensure that any significant changes to the service provider's hazard and risk management plans are communicated to the company in a timely manner. Any change shall be reviewed by a competent person to determine the ongoing effectiveness of the plan prior to the changes being implemented by the service provider. Records shall be maintained to demonstrate the results of the reviews.

2.9	There shall be effective processes to monitor and verify that the processes operated by sub-contracted service providers are effectively controlling the hazards identified.
2.10	Corrective action plans shall be defined for instances where monitoring identifies a failure of the controls or where results indicate that products or services are out of specification.
2.11	The hazard and risk analysis shall be formally reviewed at least annually and whenever: • New product types are traded ie products which have different characteristics to the products included within the original study • New services or process steps are introduced • Emergence of a new risk • Following a product recall which implicates the agents'/brokers' processes

3 Product Safety and Quality Management System

3.1 Product Safety and Quality Systems Manual	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company's processes and procedures to meet the requirements of this Standard shall be documented to allow consistent application, facilitate training, support due diligence and supply of a safe product.**
3.1.1	The company's documented procedures, working methods and practices shall be collated in a navigable and readily accessible system in the form of a printed or electronic quality manual. Consideration shall be given to the need for translation into appropriate languages.
3.1.2	The quality manual shall be fully implemented and the manual or relevant components shall be readily available to relevant staff.
3.1.3	All procedures and work instructions shall be clearly legible, unambiguous, in relevant languages and sufficiently detailed to enable their correct application by appropriate staff.

3.2 Document Control	
Requirement no.	**REQUIREMENT**
Statement of Intent	**The company shall operate an effective document control system to ensure that only the correct versions of documents are available and in use.**
3.2.1	The company shall have a procedure to manage documents which form part of the quality system. This shall include: • a list of all controlled documents indicating the latest version number. • the method for the identification and authorisation of controlled documents • a record of the reason for any changes or amendments to documents • The method for ensuring documents are maintained in good condition and are retrievable • the system for the replacement of existing documents when these are updated. Archived documents shall be retained for a defined period with consideration to any legal or customer requirements.

3.3 Record Completion	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.**
3.3.1	Records shall be legible, retained in good condition and retrievable. Any alterations to records shall be authorised and justification for alteration shall be recorded. Where records are in electronic form these shall be suitably backed up to prevent loss.
3.3.2	Records shall be retained for a defined period with consideration given to any legal or customer requirements and to the shelf life of the product or usage of packaging materials. For food products this shall take into account, where it is specified on the label, the possibility that shelf life may be extended by the consumer, e.g. freezing. Records shall be stored securely, for example, in designated storage with access restricted to authorised personnel. Records must be retrievable in a timely manner.
3.3.3	Where records are held by third parties the company shall be able to obtain copies of the records typically within one working day (e.g. warehouse intake checks).

3.4 Customer Focus and communication	
Requirement no.	**REQUIREMENT**
Statement of intent	The company shall ensure that any customer-specific policies or requirements are understood, implemented and clearly communicated to relevant staff and relevant suppliers of product and service.
3.4.1	The company shall have a system for identifying if customers have specific requirements. Where there are specific customer requirements, these shall be made known to relevant staff within the company and maintained up to date.
3.4.2	Effective processes shall be in place for communicating customer-specific requirements to the relevant suppliers of products and services (e.g. product specifications contracts with suppliers/service providers or codes of practice). Records shall be available to demonstrate that relevant customer requirements notified to the agent/broker have been notified to the relevant immediate suppliers and that these suppliers have confirmed they understand the requirements and there is documented supporting evidence of their implementation.
3.4.3	Where required by the customer, the company shall provide information to enable the approval of the last manufacturer or processor of the product. This shall include the identity of this manufacturer or processor.

3.5 Internal Audit	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company shall be able to demonstrate that it verifies the effective application of its product safety and quality system and the implementation of the requirements of this Standard.**
3.5.1	There shall be a scheduled programme of internal audits throughout the year. The scope of the internal audit programme shall cover: • the implementation of the product safety and quality management system

	• the HACCP plan or product safety plan (ie the documents and output from section 2 of this Standard) • product security/food defence • product fraud mitigation plans • procedures implemented to achieve this Standard. The scope and frequency of the audits shall be established in relation to the risks associated with the activity and previous audit performance; all activities shall be covered at least annually.
3.5.2	Internal audits shall be carried out by appropriately trained competent auditors, who are independent from the audited activity.
3.5.3	The internal audit programme shall be fully implemented. Internal audit reports shall identify conformity as well as non-conformity and the results shall be reported to the personnel responsible for the activity audited. Corrective actions and timescales for their implementation shall be agreed and completion of the actions verified.

3.6 Specification for Products	
Requirement no.	**REQUIREMENT**
Statement of intent	**Specifications or information to meet legal requirements and assist customers in the safe usage of the product shall be maintained and available to customers.**
3.6.1	Specifications shall be available for all products. These shall either be in the agreed format of the customer or, where this is not specified, include key data to meet legal requirements and assist the customer in the safe usage of the product.
3.6.2	The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed, the company shall be able to demonstrate that they have taken steps to ensure formal agreement is in place.
3.6.3	Companies shall operate demonstrable processes to ensure that any customer-specified requirements are met. This may be by inclusion of customer requirements within buying specifications or by undertaking further work on purchased product to meet the customer specification e.g. sorting, or grading of product.
3.6.4	Specifications shall be reviewed whenever products/packaging or suppliers change or as a minimum at least every three years. The date of review and the approval of any changes shall be recorded. The company shall seek formal agreement of any changes (in accordance with clause 3.6.2).

3.7 Traceability	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company shall be able to trace all product lots back to the last manufacturer and forward to the customer of the company.**
3.7.1	The company shall maintain a traceability system for all batches of product which identifies the last manufacturer or place of last significant change of the product (in the case of primary agricultural products this may be the packer). Records shall also be maintained to identify the recipient of each batch of product from the company.
3.7.2	The company shall test the traceability system to ensure traceability can be determined back to the last manufacturer and forwards to the recipient of the product from the company (ie the customer). This shall include identification of the movement of the product through the chain from the manufacturer to receipt by the customer (e.g. each movement and intermediate place of storage).

	The company shall complete at least one test annually. Where the agent or broker sub-contracts activity to multiple service providers, additional tests may be required to confirm the effectiveness of the traceability system within the different supply chains. Where a company has multiple office locations, then at least one traceability test annually shall involve products traded or managed by each office. The traceability test shall include the reconciliation of quantities of product traded by the company for the chosen batch or product lot. Traceability should be achievable within 4 hours (24 hours when information is required from external parties).
3.7.3	Where product is further processed on behalf of the company, relabelled or returned, traceability shall be maintained.
3.7.4	The company shall ensure that its suppliers of products have an effective traceability system. Where a supplier has been approved based on a questionnaire, legally enforceable contract/specification or historical trading relationship, instead of certification or audit, verification of the supplier's traceability system shall be carried out on first approval and then at least every 3 years.

3.8 Complaint Handling	
Requirement No.	**REQUIREMENT**
Statement of intent	**Customer complaints shall be handled effectively and information used to reduce recurring complaint levels.**
3.8.1	All complaints shall be recorded, investigated and the results of the investigation recorded. Corrective action appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.
3.8.2	Complaints arising from the action of a service provider or supplier shall be notified to that supplier for further investigation. Corrective actions appropriate to the seriousness and frequency of the problems identified shall be agreed and the implementation confirmed with the relevant supplier or service provider.
3.8.3	Complaint data relating to products and services shall be analysed for significant trends. Where there has been a significant increase in a complaint or a serious complaint, root cause analysis shall be used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff, suppliers and/or service providers.

3.9 Corrective Action & Preventative Actions	
Requirement No.	**REQUIREMENT**
Statement of intent	**The company shall be able to demonstrate that they use the information from identified failures in the product safety and quality management system to make necessary corrections and prevent recurrence.**
3.9.1	The company shall have a documented procedure for handling non-conformities identified within the scope of this Standard to include • clear documentation of the non-conformity • assessment of consequences by a suitably competent and authorised person • identification of the corrective action to address the immediate issue • assign responsibilities and appropriate time scales to ensure correction • verification that the corrective action has been implemented and is effective.

	• identification of the root cause of significant or recurring non-conformity and implementation of any necessary action to prevent recurrence.

3.10 Control of Non-Conforming Product	
Requirement No.	**REQUIREMENT**
Statement of intent	**The company shall ensure that any out-of-specification product is effectively managed**
3.10.1	There shall be documented procedures for managing products which do not conform to buying or customer specification. This shall include • a process for subcontractors handling the product to report potentially non-conforming product • clear identification of non-conforming product to prevent release e.g. stock management IT systems • agreed procedures with subcontractors for the secure storage to prevent accidental release • referral to the brand owner or customer where required • defined responsibilities for decision making on the use or disposal of products appropriate to the issue i.e. acceptance by concession, re-designation to an alternative customer (eg distressed stock), reworking, or destruction • records of the decision on the use or disposal of the product. • records of destruction where product is destroyed for product safety reasons.

3.11 Management of Incidents, Product Withdrawal and Product Recall	
Requirement No.	**REQUIREMENT**
Statement of intent	**The company shall have a plan and system in place to effectively manage incidents and enable the effective withdrawal and recall of products should this be required.**
3.11.1	The company shall have clear processes to enable sub-contractors and suppliers to report incidents and potential emergency situations that impact product safety, legality or quality. The company shall have procedures and assigned responsibilities for the review of incidents and to define the appropriate action.

3.11.2	The company shall have a documented procedures designed to report and effectively manage incidents and potential emergency situations that impact food safety, legality or quality, including a product withdrawal and recall procedure. This shall include as a minimum:
	• identification of key personnel constituting the recall management team with clearly identified responsibilities
	• guidelines for deciding whether a product needs to be recalled or withdrawn and records to be maintained
	• an up-to-date list of key contacts or reference to the location of such a list, e.g. recall management team, emergency services, suppliers, customers, certification body, regulatory authority
	• a communication plan including:
	  • the provision of information to customers and regulatory authorities in a timely manner
	  • instructions for customers on the return or safe disposal of recalled product
	• details of external agencies providing advice and support as necessary, e.g. specialist laboratories, regulatory authority and legal expertise
	• a plan to handle the logistics of product traceability, recovery or disposal of affected product and stock reconciliation.

	The procedure shall be capable of being operated at any time.
3.11.3	The product recall and withdrawal procedures shall be tested, at least annually, in a way that ensures their effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test and of any actual recall shall be used to review the procedure and implement improvements as necessary.
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 three working days of the decision to issue a recall.

4. Supplier and sub contracted service management

4.1 Approval and performance monitoring of manufacturers/packers of traded products.	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company shall operate procedures for supplier approval and monitoring of the last manufacturer or packer of products for which it provides a service, to ensure that traded products are safe, legal and manufactured in accordance with any defined product specifications.**
4.1.1	The company shall have a documented supplier approval procedure which identifies the process for initial and on-going approval of suppliers and the manufacturer/processor/packer of each product traded. The requirements shall be based on the results of a risk assessment which shall include consideration of • the nature of the product and associated risks • customer specific requirements • Legislative requirements in the country of sale or importation of the product • source or country of origin • potential for adulteration or fraud • the brand identity of products i.e. customer own brand or branded product.
4.1.2	The process for the initial and ongoing approval of manufacturers of products shall be based on risk and include one or a combination of: • Valid certification of the manufacturing/packing site to the applicable BRC Global Standards or other Global Food Safety Initiative (GFSI) benchmarked standard. The scope of the certification shall include the products traded by the agent/broker. • supplier audit with a scope to include product safety, traceability testing, HACCP (Hazard Analysis and Critical Control Point) or hazard and risk management review, and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor. For products assessed as low risk only, and where a valid risk-based justification is provided, initial and ongoing approval may be based on at least one of the following: • a manufacturing site questionnaire which has been reviewed and verified by a demonstrably competent person • legally enforceable contract/specification from the supplier • a historical trading relationship supported by documented evidence of performance reviews demonstrating satisfactory performance Where it is a customer requirement that products are supplied by a specific manufacturer and the liability is with that customer, this clause may not be applicable.

4.1.3	The site shall have an up-to-date list or database of approved suppliers. This may exist on paper (ie hard copy) or may be controlled on an electronic system.
4.1.4	Where products are purchased from other agents or brokers, the company being certificated shall know the identity of the last manufacturer, processor or packer, or for bulk commodity food products the consolidation place of the product. Information to enable the approval of the manufacturer, packer, or for bulk commodity products the consolidation place of the raw material, as in clause 4.1.2, shall be obtained from the other agent/broker or directly from the supplier, unless that agent/broker is themselves certificated to the BRC Standard for Agents and Brokers.
4.1.5	Records shall be maintained of the manufacturer/packer approval process, including audit reports or verified certificates confirming the product safety status of the manufacturing/packing sites supplying products traded. There shall be a process of review, and records of follow-up of any issues identified at the manufacturing/packing sites with the potential to affect products traded by the company.
4.1.6	There shall be a documented process for the on-going review of manufacturers/packers, based on risk and using defined performance criteria, which may include complaints, results of any product tests, regulatory warnings/alerts, customer rejections or feedback. The process shall be fully implemented. Where approval is based on questionnaires, these shall be reissued at least every 3 years. Contracts or formal agreements shall require suppliers to notify the company of any significant changes which take place between these formal reviews, this shall include any change in certification status.
4.1.7	The procedures shall define how exceptions to the supplier approval process in 4.1.2 are handled (eg where product suppliers are prescribed by a customer) or where information for effective supplier approval is not available (eg bulk agricultural products) and instead product testing is used to verify product quality and safety. When a company trades customer-branded product the relevant exceptions shall be identified to the customer.

4.2 Management of Suppliers of Services	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company shall be able to demonstrate that suppliers of services that are outsourced have been approved and are managed to ensure that any risks to product safety have been evaluated and effective controls are in place.**
4.2.1	There shall be a documented procedure for the approval and monitoring of suppliers of services e.g. transport, storage, laboratory testing labelling. The approval process shall be risk-based and shall consider: • Risk to products safety and quality • Compliance with legal requirements, e.g. weight, label controls • Customer-specific requirements • Potential risks to the security of the product (eg food defence, substitution or fraud)

4.2.2	The approval process shall be based on one or more of the following options: • certification of the supplier e.g. BRC Global Standards or other applicable GFSI Benchmarked Standard or applicable ISO Standard • supplier audit with a scope to include product safety, traceability testing, Hazard analysis review and good operating practices undertaken by an experienced and demonstrably competent product safety auditor. • historical performance - supported by documented evidence of performance reviews demonstrating satisfactory performance • supplier questionnaire which has been reviewed and verified by a demonstrably competent person. • licence to operate (e.g. licenced waste management contractor)
4.2.3	Contracts or formal agreements shall exist with the suppliers of services. These shall clearly specify service requirements and ensure potential product safety risks associated with the service have been addressed.
4.2.4	There shall be a formal process of review of service providers. This review shall be undertaken at a frequency based on risk, but as a minimum annually, using defined performance criteria which may include complaints, results of any product tests, customer rejections or feedback. The process shall be fully implemented.
4.2.5	Where activities covered by a supplier of services are subcontracted by that supplier to another company (e.g. 3rd party distribution or pallet sharing schemes), the subcontractor shall be required to: • work in accordance with relevant legislation • maintain product traceability • work in accordance with the requirements identified by the supplier of services' risk assessment (eg their HACCP plan), such that identified risks are prevented or reduced to an acceptable level. The contract or formal agreement with the supplier of services shall include details of any permitted subcontracting.

4.3 Product Security/Food Defence	
Requirement no.	**REQUIREMENT**
Statement of intent	**Security systems shall be in place to protect products from theft, substitution or malicious contamination whilst under the management control of the agent/broker.**
4.3.1	The company shall assess the potential risks to the security of the products from any attempt to inflict contamination or damage during subcontracted transportation and storage by the service providers the company appoints. Security measures identified by the risk assessment shall form part of the contract or terms and conditions for subcontracted suppliers which have access to the product.
4.3.2	The security arrangements at subcontracted suppliers which handle product, shall be verified at the start of a contract and then at a frequency based on risk thereafter, unless the supplier or service provider are themselves certificated to a BRC Global Standard or GFSI-recognised scheme, which includes requirements for food defence or product security.

4.4 Product Inspection and Laboratory Testing	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company shall operate processes to ensure that products received comply with buying specifications and supplied product is in accordance with any customer specification.**
4.4.1	The company shall have a product sampling or verification programme to ensure that products are in accordance with buying specifications and meet legal and safety requirements. Product verification may be completed by the agent/broker or by the supplier. Selection of appropriate verification techniques shall be based on risk, and may include: • product safety testing - for example, microbiological, chemical, physical or allergen contaminants or flammability testing of home furnishings • authenticity/integrity testing • product quality assessment – for example organoleptic testing of food, integrity testing of packaging, colourfastness in fabrics or fragrance testing of cosmetics • Verification and product testing by the manufacturer (eg certificates of analysis or conformance) Where verification is based on sampling, the sample rate and assessment process shall be risk-based. Records of the results of assessments or analysis shall be maintained.
4.4.2	Where verification of conformity is provided by the supplier, (e.g. certificates of conformance or analysis), the level of confidence in the information provided shall be verified. Procedures shall be in place to ensure the reliability of supplier's laboratory results, such as confirmation of recognised laboratory accreditation or laboratory operation in accordance with the requirements and principles of ISO/IEC 17025.
4.4.3	Where claims are made about products handled, including the provenance, chain of custody, and assured or 'identity preserved' status (see Appendix 5 - Glossary) of a product or raw materials used; supporting information shall be available from the supplier or independently to verify the claim.
4.4.4	Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory, or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO/IEC 17025. Documented justification shall be available where non-accredited test methods are used.
4.4.5	Test and inspection results shall be retained and reviewed to identify trends. The significance of external laboratory results shall be understood and acted upon accordingly. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.

4.5 Product Legality and Labelling	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company shall have processes in place to ensure that the products traded comply with the legal requirements in the country of sale where known.**
4.5.1	The company shall have documented processes to verify the legality of products which are traded. This shall include as applicable:

	• labelling information • compliance to relevant legal requirements eg export requirements, compositional requirements (eg ingredients list, allergen labelling, INCI list, etc) or specific product safety legislation (eg directions for safe use, warning labels, flammability) • compliance with quantity or volume requirements Where such responsibilities are undertaken by the customer, this shall be clearly stated in contracts.
4.5.2	The company shall have documented processes to verify that the product bears appropriate information according to customer requirements.

4.6 Product Design/Development	
Requirement no.	**REQUIREMENT**
Statement of intent	**Product design and development procedures shall be in place for new manufactured product- development processes, where this is a service managed by the company, to ensure that safe and legal products are developed, meeting the appropriate quality and customer- specified requirements.**
4.6.1	The company shall have a process for managing new product development activity with potential suppliers, which shall include: • a project brief defining the requirements for the products to be developed • a process for reviewing product samples against the brief • a formal product approval process
4.6.2	The company shall ensure that all new manufactured products have been included within the HACCP/Hazard and Risk Management plan of the manufacturing site. This shall ensure that hazards have been assessed and suitable controls are implemented.
4.6.3	The company shall be able to demonstrate that the shelf life attributed to new food products has been verified either through shelf-life testing assessment or using documented protocols reflecting conditions experienced during storage and handling, or, where this is not practical via a documented science-based justification.
4.6.4	The company shall have processes to ensure new products are labelled to meet legal requirements for the designated country of use. Depending on the legislation, this shall include information to allow the safe handling, display, storage, preparation and use of the product within the supply chain or by the customer. There shall be a process to verify that ingredient, allergen and allergen cross-contamination labelling is correct based on the product recipe and expected country of sale.
4.6.5	Where a product is designed to enable a claim to be made to satisfy a consumer group (e.g. nutritional claim, reduced sugar, dermatologically tested), the company shall ensure that the product formulation and production process is fully validated to meet the stated claim.

4.7 Product Release	
Requirement no.	**REQUIREMENT**
Statement of intent	**Where products require formal release by a customer or legal authority, the company shall ensure that an effective product release procedure is in place, with facilities holding products on behalf of the company.**
4.7.1	Where products require positive release, procedures shall be in place to ensure that release does not occur until all release criteria have been completed and release authorised by the company.

4.8 Product Authenticity	
Requirement no.	**REQUIREMENT**
Statement of Intent	**Systems shall be in place to minimise the risk of purchasing fraudulent or adulterated products and to ensure that all product descriptions are legal, accurate and verified.**
4.8.1	The company shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of adulteration or substitution of products. Such information may come from: • trade associations • government sources • private resource centres.
4.8.2	A documented vulnerability assessment shall be carried out on all products or groups of products to assess the potential risk of adulteration or substitution. This shall take into account: • historical evidence of substitution or adulteration • economic factors which may make adulteration or substitution more attractive • ease of access to products • sophistication of routine testing to identify adulterants • nature of the product
4.8.3	Where products are identified as being at particular risk of adulteration or substitution appropriate assurance and/or testing processes shall be in place to reduce the risk.

4.9 Management of Surplus Products	
Requirement no.	**REQUIREMENT**
Statement of intent	**Effective processes shall be in place to ensure the safety and legality of surplus products donated to charities or other organisations.**
4.9.1	Surplus customer-branded products shall be disposed of, or rendered unusable, in accordance with customer-specific requirements.
4.9.2	Where customer-branded products which do not meet specification are passed onto charities or other organisations this shall be with the prior consent of the brand owner.
4.9.3	Where products are donated, processes shall be in place to ensure that all donated products are fit for consumption or use and meet legal requirements.

5 Personnel

5.1 Training and Competency	
Requirement no.	**REQUIREMENT**
Statement of intent	**The company shall ensure that all personnel performing work that affects product safety, legality and quality are demonstrably competent to carry out their activity, through training, work experience or qualification.**
5.1.1	All relevant personnel, including temporary staff, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.
5.1.2	The company shall have a documented training procedure and documented training records to demonstrate that the training is appropriate and effective.
5.1.3	The company shall routinely review the competencies of staff directly involved with product safety. As appropriate, it shall provide relevant training. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience.

6 FSMA Preventive Controls Preparedness Module

BRC Global Standards are currently preparing additional material to assist agents and brokers operating in, or trading with, the USA. The aim will be to assist organisations to understand the relevant elements of the FSMA (Food Safety Modernization Act) Preventive Controls for Human Foods that are not explicitly covered elsewhere within the BRC Global Standard for Agents and Brokers.

The draft of this material is currently being developed and will be added as soon as available.

Section III

The Audit Protocol

Introduction

The audit protocol describes how the audit process operates for the Standard and the rules around the audit and certification to the Standard. This is an essential element of the Standard and should be read and fully understood. The process is summarised in Figure 1. (*To be added to the final document*)

Every effort has been made to ensure that the content of this audit protocol is accurate at the time of printing. However, it may be subject to minor change, and reference should be made to the BRC Global Standards website, **www.brcglobalstandards.com**, where any changes will be published.

Conformance by the company with the requirements of the *Global Standard for Agents and Brokers* and its suitability for the awarding and continuing retention of certification will be assessed by an independent audit company – the certification body. Certification will be awarded on completion of a successful audit and closure of any non-conformities identified to the satisfaction of the certification body within a defined time period.

1 General Protocol – Audit Preparation

1.1 Selection of an Audit Option

There are two options and processes available for sites to demonstrate their commitment to the Global Standard for Agents and Brokers.

1.1.1 Announced audit programme

This is available for existing certificated sites and those new to certification. The audit date is agreed with the certification body in advance of the audit.

Successful sites are awarded a certificate with grade AA, A, B or C depending on the number and type of non-conformities identified.

More details on the announced audit programme can be found in Part III, section 2.

1.1.2 Unannounced audit programme

The unannounced audit option is available to all sites, although sites which are not currently certificated need to recognise that the audit may not take place for up to 1 year from the date of application.

The certification body will identify a suitable audit date but the date is discussed with, or communicated to the site in advance of the audit.

The unannounced audit option provides sites with the opportunity to demonstrate the maturity of their quality systems and successful sites are awarded grades of AA+, A+, B+ or C+ depending upon the type and number of non-conformities identified at the audit.

The unannounced audit process is summarised in Figure 2 (*To be added to final document*). More details on the unannounced audit programme can be found in Part III, section 3.

1.2 Self-Assessment of Compliance with the Standard

The Standard should be read and understood and a preliminary self-assessment should be conducted by the company against the Standard to prepare for the audit. Any areas which need to be improved to meet the requirements should be addressed by the company to prevent a non-conformity being raised at the audit. Further information and guidance to ensure compliance with the Standard, including training courses and guideline booklets, is available from the BRC Book Shop or from BRC Participate.

An optional on-site pre-assessment may be carried out by the selected certification body in preparation for the audit, to provide guidance to the company on the process of certification. It should be noted, however, that, under the rules for accreditation, consultancy cannot be provided during any pre-assessment offered by the same certification body which will later undertake the certification audit.

1.3 Selection of a Certification Body

Audits against the BRC Global Standards are only recognised if undertaken by certification bodies that are recognised and approved by BRC Global Standards. The BRC Global Standards cannot advise on the selection of a specific certification body; however, there is a comprehensive programme of measurement of certification body performance around specific key performance indicators (KPIs), the results of which are converted to a 5-star

rating and published with the listing of all BRC-approved certification bodies on www.brcdirectory.com.

1.4 Company/Certification Body Contractual Arrangements

A contract shall exist between the company and the certification body, detailing the scope of the audit and the reporting requirements in accordance with the requirements of ISO/IEC 17065. The contract shall also contain clauses which allow effective management of the scheme by BRC Global Standards and accreditation of the certification body by their accreditation body. These are essential to ensure confidence in the way in which the scheme is managed and consistency achieved, which benefits all certificated sites. In particular, it is condition of certification to the scheme that:

- A copy of the audit report and any subsequent certificate or audit result shall be supplied to BRC Global Standards and may be supplied to the accreditation body in the agreed format for the BRC Global Standard used. Other documents in relation to the audit shall be made available to BRC Global Standards upon request. All documents submitted to BRC Global Standards shall be copies of original documents. Documents provided to BRC Global Standards will be treated as confidential.

- The auditor(s) may be accompanied by other personnel for training assessment or calibration purposes. This activity may include:

    - training of new auditors by the certification body

    - routine certification body shadow audit programmes

    - witness audits by accreditation bodies

    - witness audits by BRC Global Standards

BRC Global Standards reserves the right to conduct its own audit or visit to a site once certificated in response to complaints or as part of the routine BRC Global Standards compliance activity to ensure the integrity of the scheme. Such visits may be announced or unannounced.

BRC Global Standards may contact the site directly in relation to its certification status or for feedback on certification body performance, or investigation into reported issues.

This publication sets out the requirements for sites that want to apply to be audited against the Standard and for sites issued with a certificate. Contracts between the certification body and the company shall include a clause acknowledging these obligations. This contract will be formulated by the certification body.

Non-compliance with any of these contractual obligations may affect the status of certification of the company.

1.5 Registration fee

BRC Global Standards require a registration fee to be collected by the certification body from the company for every audit undertaken. The certificate and audit report shall not be valid until the registration fee and the certification body's audit fees have been received, irrespective of the outcome of the certification process.

1.6 Scope of Audit

1.6.1 Defining the audit scope

The scope of the audit, the products and services provided, shall be agreed between the company and the certification body in advance of the audit to ensure the allocation of an auditor with the correct product knowledge. The audit shall include all applicable requirements within the Standard and all applicable products traded by the company within the scope of the Standard.

The audit scope and any services excluded shall be clearly defined both on the audit report and on any certificate issued. The scope description on reports and certificates must include:

- products and product category/categories (see Appendix 3)
- operation, i.e. broker and or agent/service provider
- Information relating to any services contracted by the agent/broker will also be recorded on the audit report.

The wording of the scope will be verified by the auditor during the site audit. The description of products or product groups within the scope shall enable a recipient of the report or certificate to clearly identify whether products supplied have been included within the scope.

1.6.2 Exclusions from scope

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 and it is permissible for a company to have some offices certificated under the scheme and other offices not included in the scheme.

1.6.3 Additional locations and office assessments

Companies providing services within the scope of the Standard may have a single office or may have a number of offices based in one or more countries around the world. The scope of certification may include all the offices or only specific offices.
Where a company has multiple office locations, which are included within the scope of the audit, it will be necessary to audit the operations of those individual offices. Where a company has multiple office locations, all operating to a common quality system and where all records are electronic and available these can be audited from a single location.

The certification body shall develop an audit programme for the assessment of a multiple-office system which enables the information relating to each individual office to be fully audited and must provide complete confidence that each individual office complies with the full requirements of the Standard, i.e. the certification body must have full confidence that the same quality system is in use in each office and that it is operating effectively.

It may not be necessary for each individual office location to be physically visited in order to complete the audit but the need for physical audits of additional locations may be required where:

- the central systems do not work effectively during the head office audit or are insufficient to provide complete access to information
- information supplied by the company is found to be incomplete or inaccurate.
- significant issues are identified at an office audit which would necessitate visits to another office to fully demonstrate compliance to a level to achieve certification of that office

Where the office is not physically visited it is essential that this is justified, and a full audit of the location is completed prior to a certificate being issued. Therefore, it is expected that for each additional office being audited, the auditor will:

- access sufficient records and procedures to demonstrate the operation of the systems and the accuracy and completeness of relevant record keeping at that specific office
- complete at least one vertical audit of a product handled or managed through the office
- interview relevant staff. The purpose of this interview is to question staff on specifics relating directly to documents, processes or activities already assessed and to obtain clarity on any points raised while auditing the systems (i.e. it is identical to the type of interview that would be completed during an on-site audit). It is not intended that the whole audit will be completed during this interview, as a substantive amount of the procedures, records and operations will have already been reviewed prior to the interview.

The audit plan for all offices shall be agreed between the certification body and the company. This plan must contain sufficient detail relating to the auditing of each office, so that the minimum time used for each office and the activities that will be covered for each office are clearly identified.

The audit duration for a multiple site audit is expected to be significantly longer than for a single office audit of comparable size and complexity. Each additional location included in the audit scope will therefore increase the audit duration by a minimum of 2 – 3 hours.

Non-conformities raised against the additional locations shall be recorded on the audit report for the head office (or central, physically audited, office) and shall be included within the count of non-conformities contributing to the grade and certification decisions. Therefore, all of the office locations within the audit scope will form part of the same certification decision.

A single certificate shall be issued for all of the offices included within the audit scope. (An individual certificate for an office can only be issued where an auditor has physically visited and audited that specific location).

The format of the certificate will comply with the template in appendix 4 of this Standard.

1.6.4 Extension to scope

Once certification has been granted, any additional significant products or product groups traded or services undertaken by the company, which may be included in the scope of certification, must be communicated to the certification body. The certification body shall assess the significance of the new products or services and decide whether to conduct an office visit or undertake a document review to extend scope.

Where an extension to scope is awarded, the current certificate will be superseded by a new certificate showing the amended scope. The new certificate issued shall have the same expiry date as detailed on the original certificate.

1.7 Auditor selection

It is the responsibility of the company to ensure that adequate and accurate information is given to the certification body detailing the products it trades and the services provided, to enable the certification body to select an auditor with the required skills to undertake the audit. (Refer to Appendix 3 for Auditor Product Categories to be used when selecting an auditor).

The certification body, auditors and the company must be aware of the need to avoid conflict of interest when arranging an auditor for the office visit. The company may decline the services of a particular auditor offered by the certification body. The same auditor is not permitted to undertake audits on more than three consecutive occasions at the same company.

2 Announced Audit Protocol

2.1 Audit Planning

2.1.1 Preparation by the company

For the initial audits the company shall agree a mutually convenient date, with due consideration given to the amount of work required to meet the requirements of the Standard.

Newly established companies must ensure that systems and procedures in place are compliant before an initial BRC Global Standard audit is undertaken. It is at the discretion of the company when it wishes to invite a certification body to carry out an audit; however, it is unlikely that full compliance can be satisfactorily demonstrated at an audit undertaken less than three months from commencement of operation.

There is a requirement on the company to be prepared for the audit, to have appropriate documentation for the auditor to assess and to have appropriate staff available at all times during the audit.

2.1.2 Information to be provided to the certification body for audit preparation

The company shall supply the certification body with background information prior to the audit day to ensure the auditor is fully prepared and to provide the best opportunity for the

audit to be completed efficiently. The information will be requested by the certification body and may include but is not limited to:

- overview of the company's operation, including office locations
- management organisational chart and key contacts
- list of products or product groups included within the audit scope
- list of services to be included within the audit scope
- international range of company activities
- summary of hazard and risk analysis
- recent quality issues, withdrawals or customer complaints, and other relevant performance data.

The company shall make the previous year's audit report and certificate available to the certification body where this is a contract with a new certification body.

The time to assess all documentation by the auditor and certification body is supplementary to the duration of the audit.

2.1.3 Duration of the audit

Before the audit takes place, the certification body shall indicate the approximate duration of the audit. The minimum duration of an audit is one man day at the company's office facility. A calculator has been developed to assess the expected time required to undertake the audit of any particular company, to ensure consistency, and this shall be used as the basis for calculating the total audit duration. Full details can be found on the BRC Global Standards website (www.brcglobalstandards.com).

The calculation for the audit duration is based on:

- number of suppliers
- number of products/product groups traded
- number of office locations included in the audit scope It is recognised that other factors may also influence the actual time taken to complete the audit and may result in a longer than scheduled audit. These factors include:
- communication difficulties, e.g. language, failed links to other offices
- the number of non-conformities recorded in the previous audit
- difficulties experienced during the audit, requiring further investigation
- the quality of company preparation, e.g. documentation, hazard and risk analysis, quality management systems.

- The number of additional services provided by the agent or broker

The calculation for the audit duration shall determine the expected amount of time to undertake the office audit. Additional time will be required for the review of any documentary evidence provided in response to non-conformities identified and the completion of the final audit report.

Deviation from the calculated audit time must be justified and specified on the audit report.

2.2 The Office Audit

The office audit consists of the following stages:

- the opening meeting – to confirm the scope and process of the audit
- document review – a review of the documented hazard and risk analysis and quality management systems
- traceability challenge(s)
- review of records
- final review of findings by the auditor – preparation for the closing meeting
- closing meeting – to review audit findings with the company. Note that non-conformities are subject to subsequent independent verification by the certification body management.

The company will fully assist the auditor at all times. It is expected that at the opening and closing meetings those attending on behalf of the company will be senior managers who have the appropriate authority to ensure that corrective action can be progressed if non-conformities are found. The most senior manager on site or their nominated deputy shall be available at the audit and attend the opening and closing meetings.

During the audit, detailed notes shall be made regarding the company's conformities and non-conformities against the Standard and these will be used as the basis for the audit report. The auditor will assess the nature and severity of any non-conformity.

At the closing meeting, the auditor shall present his/her findings, and discuss all non-conformities that have been identified during the audit, but shall not make comment on the likely outcome of the certification process. Information on the process and timescales for the company to provide evidence to the auditor of the corrective action to close non-conformities must be given. A written summary of the non-conformities discussed at the closing meeting will be documented by the auditor either at the closing meeting or within one working day after completion of the audit.

At the closing meeting, the auditor shall provide the company with an explanation of the BRC Directory system, which allows secure access to audit data for both the client and its nominated customers.

The decision to award certification will be determined independently by the certification body management, following a technical review of the audit report and the closing of non-

conformities in the appropriate timeframe. The company will be informed of the certification decision following this review.

2.3 Non-conformities and Corrective Action

The level of non-conformity assigned by an auditor against a requirement of the Standard is an objective judgement with respect to severity and risk and is based on evidence collected and observations made during the audit. This is verified by the certification body management.

2.3.1 Non-conformities and corrective actions

There are three levels of non-conformity:

Critical – where there is a critical failure to comply with a product safety or legal issue.

Major – where there is a substantial failure to meet the requirements of a 'statement of intent' or any clause of the Standard **or** a situation is identified which would, on the basis of available objective evidence, raise significant doubt as to the conformity of the product or services being supplied.

Minor – where a clause has not been fully met but, on the basis of objective evidence, the conformity of the product or services is not in doubt.

The objective of the audit is to provide a true reflection of the standard of the operation and level of conformity against the *Global Standard for Agents and Brokers*. Consideration should therefore be given to awarding a single major non-conformity where minor non-conformities are repeatedly raised against a particular clause of the Standard. Clustering of a significant number of minor non-conformities against a clause and recording this as a single minor non-conformity is not permitted.

2.3.2 Procedures for handling non-conformities and corrective action

Following identification of any non-conformity during the audit, the company must undertake corrective action both to remedy the immediate issue and undertake an analysis of the underlying cause of the non-conformity (root cause) and, as a minimum for major and critical non-conformities, develop an action plan to address the root cause.

The process for closing out non-conformities depends upon the level of non-conformity and the numbers of non-conformities identified (see Table 1).

Critical non-conformities or a combination of non-conformities resulting in non-certification

In some circumstances the number or severity of non-conformities raised at the audit prevents the site from being certificated following that audit. This will be the case where there is a:

- critical non-conformity

and/or

- the number or type of non-conformities exceeds the limits for certification as per Table 1.

The grading of non-conformities will be reviewed by the independent certification process of the certification body as soon as possible after the audit. Where the review confirms that a certificate cannot be awarded, the company will be required to undertake another full audit before assessment for certification.

Due to the nature and number of non-conformities, it is unlikely that these non-conformities can be addressed and fully effective improvements implemented and established within a 28-day period – although there may be some exceptions. Therefore, the re-audit shall not take place any earlier than 28 days from the audit date.

Where this occurs at a certificated site, certification must be immediately withdrawn.

It is a requirement of some customers that they shall be informed when their suppliers have a critical non-conformity identified or fail to gain certification. In such circumstances the company shall immediately inform its customers and make them fully aware of the circumstances. Information on the corrective actions to be taken in order to address the non-conformities will also be provided to customers where required.

Major and minor non-conformities

No certificate shall be issued until major and minor non-conformities have been demonstrated as having been corrected, either permanently or by a temporary solution that is acceptable to the certification body.

For each non-conformity raised, the site shall, in addition to undertaking the necessary immediate corrective action, undertake a review of the underlying cause (root cause) of the non-conformity. The root cause shall be identified and an action plan to correct this, including timescale, provided to the certification body. The proposed preventive action shall be included in the audit report.

Close-out of non-conformities can be achieved either by objective evidence being submitted to the certification body, such as updated procedures, records or invoices for work undertaken etc., or by the certification body undertaking a further office visit.

If satisfactory evidence is not provided within the 90 days following the audit for companies new to the Standard or within 28 days for existing certificated companies, certification will not be granted. The company will then require a further full audit in order to be considered for certification.

Non-conformities from the audit shall also be checked during the next audit to verify effective close-out of the non-conformities and their root cause. Where the correction has been ineffective, a non-conformity shall be raised against clause 1.1.11.

The certification body will review objective evidence of corrective action completed prior to awarding a certificate.

2.4 Grading the audit

The purpose of the certification grading system is to indicate to the user of the report the commitment of the site to continual compliance and will dictate the future audit frequency. The grade is dependent on the number and severity of the non-conformities identified at the time of the audit. Non-conformities are verified by a technical review process by the certification body management. If the review results in a change in the number and/or severity of non-conformities, the site shall be notified.

Table 1 – Summary of Grading Criteria, Action Required and Audit Frequency

Grade Announced	Grade Unannounced	Critical	Major	Minor	Corrective Action	Audit Frequency
AA	AA+	0	0	5 or fewer	Objective evidence: • within 28 calendar days where company is currently certificated • within 90 calendar days where this results from an initial audit	12 months
A	A+	0	0	6 to 10	Objective evidence: • within 28 calendar days where company is currently certificated • within 90 calendar days where this results from an initial audit	12 months
B	B+	0	0	11 to 15	Objective evidence: • within 28 calendar days where company is currently certificated • within 90 calendar days where this results from an initial audit	12 months
B	B+	0	1	10 or fewer		12 months
C	C+	0	0	16 to 20	Objective evidence: • within 28 calendar days where company is currently certificated • within 90 calendar days where this results from an initial audit	6 months
C	C+	0	1	11 to 15		6 months
C	C+	0	2	10 or fewer		6 months
Not certificated	Not certificated	1 or more	0	0	Certificate not granted. Full re-audit required, usually no less than 3 months following the initial audit.	
Not certificated	Not certificated	0	0	21 or more		
Not certificated	Not certificated	0	1	16 or more		
Not certificated	Not certificated	0	2	11 or more		
Not certificated	Not certificated	0	3 or more	0		

The certification body shall justify a high number (more than 20) of minor non-conformities where one or no major non-conformities are given. This shall be detailed on the audit report.

2.5 Audit Reporting

Following each audit, a full written report shall be prepared in the agreed format. The report shall be produced in English or in another language dependent upon user needs. Where the report is produced in a language other than English, the audit summary sections shall always be reported in English in addition.

The audit report shall provide the company and particularly customers or prospective customers with a profile of the company and an accurate summary of the performance of the company against the requirements of the Standard.

The audit report must assist the reader to:

- be informed of the product safety controls in place and improvements since the last audit
- be informed of non-conformities, the corrective action taken and plans to correct the root cause (preventive actions).

The report shall accurately reflect the findings of the auditor during the audit. Reports shall be prepared and dispatched to the company within 42 calendar days (up to 104 days will be permitted for initial audits where the additional time is required to close non-conformities) of the date of completion of the full audit.

Audit reports shall remain the property of the company commissioning the audit and shall not be released, in whole or part, to a third party unless the company has given prior consent (unless otherwise required by law).

The audit report shall be uploaded to the BRC Directory in a timely manner irrespective of whether a certificate is issued. The owner of the audit report may allocate access to the audit report to customers or other parties via the BRC Directory.

The audit report and associated documentation, including the auditor's notes, shall be stored safely and securely for a period of five years by the certification body.

2.6 Certification

After a review of the audit report and documentary evidence provided in relation to the non-conformities identified, a certification decision shall be made by the designated independent certification manager. Where a certificate is granted, this shall be issued by the certification body within 42 calendar days of the audit. (Up to 104 days will be permitted for initial audits where the additional time is required to close non-conformities.) The certificate shall conform to the format shown in Appendix 4. Logos used on certificates, e.g. BRC Global Standards and accreditation body logos, shall comply with their respective usage rules.

The certificate will detail:

- the scope of the audit. The certificate shall be issued to the company and include the location of the office applicable.
- The audit option chosen (ie announced or unannounced)
- the six-digit auditor registration number of the lead auditor.

- The date(s) of audit specified on the certificate shall be the date of the audit relating to the granting of that certificate, irrespective of whether later visits were made to verify corrective action arising from the audit.

Whilst the certificate is issued to the company, it remains the property of the certification body, which controls its ownership, use and display.

2.7 Ongoing Audit Frequency and Certification

2.7.1 Scheduling re-audit dates

The ongoing audit schedule and choice of audit programme will be agreed between the company and the certification body. The frequency of announced audits will be 6 or 12 months and is dependent upon the performance of the site at an audit as reflected by the grade (see Table 1).

The due date of the subsequent audit shall be calculated from the date of the initial audit, irrespective of whether further site visits were made to verify corrective action arising from the initial audit, and not from the certificate issue date.

The subsequent audit shall be scheduled to occur within a 28-day time period up to the next audit due date. This allows sufficient time for corrective action to take place in the event of any non-conformities being raised, without jeopardising continued certification.

Appendix 5 provides worked examples.

It is the responsibility of the company to maintain certification. Where an audit is delayed beyond the due date. This allows sufficient time for corrective action to take place in the event of any non-conformities being raised, without jeopardising continued certification.

It is the responsibility of the company to maintain certification. Where an audit is delayed beyond the due date, except in justifiable circumstances, this shall result in a major non-conformity being awarded (against clause 1.1.9) at the next audit. Justifiable circumstances shall be documented in the audit report.

2.7.2 Delayed audits – justifiable circumstances

There will be some circumstances where the certificate cannot be renewed on the 6 or 12-month basis due to the inability of the certification body to conduct an audit. These justifiable circumstances which would not result in the assigning of a major non-conformity (refer to Section II clause 1.1.9) can be included when the company is:

- situated in a specific country or an area within a specific country where there is government advice not to visit and there is no suitable local auditor

- situated in an area that has suffered a natural or unnatural disaster, rendering the auditor unable to visit.

Moving the audit date to a more ‘acceptable’ later date for reasons of combining audits or lack of personnel is not a justifiable circumstance for missing the due date.

If renewal of the certificate is prevented due to these exceptional circumstances, the customer may still decide to take products from that company for an agreed time, as it may still demonstrate legal compliance by other means, such as risk assessment and complaints records, until another audit can be arranged.

2.7.3 Audits undertaken prior to due date

The due date of the renewal audit occurs within a 28-day window prior to the 6 or 12-month anniversary of the initial audit.

In some circumstances it is possible to undertake the audit earlier than this due date, for example, to reset the audit date to allow combined audits with another scheme. Where an audit date is brought forward, the following rules shall apply:

- The audit report will detail the reasons why an audit has been brought forward.
- The audit due date will be 'reset' to be 12 months (or 6 months depending on grade) from this audit date.
- The certificate shall be issued with an expiry date of 12 months (or 6 months depending on grade) +42 days from the 'new' audit date.

3 Unannounced Audit Protocol

The date of the audit shall not be notified to the company in advance of the audit. The audit will be unannounced and replace the normal scheduled audit. Although the audit may occur at any stage between 3 and 12 months of the audit due date, this shall typically be within the last 4 months of the certification cycle.

3.1 Audit Planning

3.1.1 Selection of the unannounced audit option

The site shall notify its certification body of its intention to join or remain within the unannounced audit programme. Where a company wishes to move from the announced audit programme to the unannounced scheme or to remain in the unannounced scheme, this notification shall be within 3 months of the last audit date. For companies who wish their initial audit to be unannounced, this shall be notified at the time of the initial application to the certification body (in this situation the company need to recognise that the unannounced audit may not take place for up to 1 year from the date of application).

3.1.2 Preparation by the Company

The actual date will not be provided by the certification body and it is therefore important that the company has arrangements in place to receive an audit and facilitate the audit process.

Success at an unannounced audit relies upon the ability of the company to share information and knowledge within the site, to have effective deputies to cover in the absence of a particular manager, and a shared responsibility within the management team for product safety and compliance with the Standard.

3.1.3 Information to be provided to the certification body for audit preparation

The site shall supply the certification body with background information prior to the audit day to ensure the auditor is fully prepared and to provide the best opportunity for the audit to be completed efficiently. The information will be requested by the certification body and may include but is not limited to:

- overview of the company's operation, including office locations
- management organisational chart and key contacts
- typical hours of operation
- list of products or product groups included within the audit scope
- list of services to be included within the audit scope
- international range of company activities
- summary of hazard and risk analysis
- recent quality issues, withdrawals or customer complaints, and other relevant performance data.

The company shall make the previous year's audit report and certificate available to the certification body where this is a contract with a new certification body.

As the audit will be unannounced it is likely that the certification body will also require additional information to plan for the logistics of the audit process. This may include:

- recommended local hotels
- specific directions to the company's office and car parking arrangements
- a list of contacts when first arriving at the office

3.1.4 Nominating non-audit days

The unannounced audit option allows companies the opportunity to nominate 15 days when the company is not available for an audit. The dates must be provided at least 4 weeks in advance and the reason must be provided (eg planned customer visit). The certification body may challenge the reason where this does not appear appropriate.

Days when the company is not operating (eg weekends, public holidays, planned shutdowns for holidays) are not included within the 15 days. Any such days shall be notified to the certification body when opting into the unannounced scheme.

Certification bodies are expected to operate discretion in the case of emergencies.

It is a condition of electing to join the unannounced scheme that the auditor shall be granted access to the company for the audit on arrival. If access is denied the company will be liable for the auditor's costs and will revert to the announced audit scheme. At the discretion of the certification body, the existing certificate may also be suspended or withdrawn.

3.1.5 Audit duration

The audit duration is the same as for the announced audit scheme (see section 2.1.3).

3.2 The Office Audit

Companies opting for the unannounced scheme shall be obliged to accommodate the auditor and allow the audit to start immediately on arrival at the office. The audit process will follow the same procedures as outlined for an announced audit (see section 2.2).

3.3 Non-conformities and corrective action

Non-conformities and corrective actions are the same as for the announced audit scheme (see section 2.3).

3.4 Grading of the audit

The process for grading the audit is the same as for the announced audit scheme (see section 2.4). The grade awarded following certification shall be based on the number and level of non-conformities, as outlined in Table 1. Note that the grade will have the addition of a plus symbol after the grade (ie AA+, A+, B+ or C+).

3.5 Audit reporting

The audit reporting requirements are the same as for the announced audit scheme (see section 2.5). However, the report shall state 'Unannounced'.

3.6 Certification

The certification requirements are the same as for the announced audit scheme (see section 2.6). However, the certificate shall state 'Unannounced'.

The certificate will supersede the existing certificate. The certificate shall be issued within 42 days of the audit (104 days where this is an initial audit and the company days will be permitted for initial audits where the additional time is required to close non-conformities) and will have an expiry date based on the expiry date of the previous certificate plus 12 months, providing the company remains within the unannounced audit scheme. If the company decides to return to the announced audit programme, the certificate expiry date will be based 6 or 12 months from the date of the unannounced audit.

This ensures that where the audit occurs before the expiry of the current certificate and the company remains within the unannounced scheme it is not disadvantaged by a shorter certificate life and increased frequency of audits.

3.7 Ongoing Audit Frequency and recertification – scheduling re-audit dates

The company can choose whether to:

- Remain within the unannounced programme

- Revert to the announced audit programme

If the company wishes to remain in the unannounced audit programme, the next audit will be unannounced and may occur at any stage from 3 months after the last audit date through to 42 days prior to the certificate expiry date; however, this shall typically be within the last 4 months of the certification cycle. This allows sufficient time for corrective action to take place in the event of any non-conformities being raised without jeopardising continued certification.

It is the responsibility of the certification body to ensure that the audit is undertaken within the certification window and the late audit non-conformity clause (1.1.9) shall not apply.

If the company opts to withdraw from the unannounced audit programme, the next audit will be scheduled to occur within 28 days up to and including the anniversary of the last audit date; this ensures that the maximum time between audits is not more than a year.

4 FSMA Preventive Controls Preparedness Module

4.1 Background and scope

The aim of the module is to assist agents and brokers that are trading products into the United States to understand the relevant prescriptive elements within the FSA Preventive Controls for Human Foods that are not explicitly covered within the BRC Standard Global Standard for Agents and Brokers.

It does not represent a certification to the legislation, or guarantee that all aspects of the company's operations will be found fully compliant to the regulation, rather it is a deeper clarification of the expected interpretations and expectations, once implementation dates come into effect.

This module may be used by any company located within the United States as an assessment step in the preparation for their required compliance date. It may be used by companies outside of the United States, who see this market as a current, or future export target, to show evidence to the importer of record that they have specifically addressed certain aspects of the supplier verification section. Additionally, it may be used by specifiers to gain understanding and evidence of compliance to specific parts of the regulation.

4.2 Scope

This module is applicable to companies located within the United States (as a preparedness assessment in preparation for regulatory compliance assessments) and those companies currently wishing to export products and ingredients to the United States.

4.2.1 Exclusions from Scope

The module is voluntary; however, for the module to be included within the site's certification. All products within the site's scope shall be included. No exclusions are permitted.

4.3 Audit Planning
4.3.1 Preparation by the Company

The certification body shall be notified in advance of the audit of the intention to add the FSMA Preventative Controls Preparedness Module to the scope of the audit. This ensures

sufficient additional time can be scheduled and that an auditor with the appropriate qualifications for the module is selected.

4.3.2 Information to be provided to the Certification Body for Audit Preparation

The company shall supply the certification body with any additional background information requested prior to the audit day to ensure the auditor(s) is fully prepared to audit against the module.

4.3.3 Audit Duration

In order for the FSMA Preventive Controls Preparedness Module to be included within the audit scope, additional time will be needed for the audit. The amount of additional time will depend on several factors, primarily the organisation, knowledge and preparedness of the facility personnel. The certification body shall indicate the expected additional time requirements whilst planning the audit.

Typically, this additional time is (*To be Confirmed Once Final Module Requirements Are Agreed*).

4.4 The On-Site Audit

Evidence of compliance with the requirements of the FSMA Preventive Controls Preparedness Module shall be assessed as part of the audit against the requirements of the whole Standard and is expected to be integrated into the audit programme as appropriate.

During the audit, detailed notes shall be made regarding the company's conformities and non-conformities against the requirements of the module. The auditor(s) shall assess the nature and severity of any non-conformity.

At the closing meeting, the auditor(s) shall present their findings and discuss all non-conformities that have been identified against the module. A written summary of the non-conformities discussed at the closing meeting will be documented by the auditor either at the closing meeting or within 1 working day after completion of the audit.

The decision to award certification for the module will be determined independently by the certification body management, following a technical review of the audit report and the closing of non-conformities in the appropriate timeframe. The company will be informed of the certification decision following this review.

4.5 Non-conformities and Corrective Action

The level of non-conformity assigned by an auditor against a requirement of a voluntary module is an objective judgement with respect to severity and risk and is based on evidence collected and observations made during the audit. This is verified by the certification body management.

4.5.1 Non-conformities

Non-conformities against the requirements of the module shall be graded in the same way as non-conformities identified against requirements of the rest of the Standard, namely:

- **Critical**: Where there is a critical failure to comply with a product safety or legal issue within the scope of the module.

- **Major**: Where there is a substantial failure to meet the requirements of any clause of the module or a situation is identified which would, on the basis of available objective evidence, raise significant doubt as to the conformity of the product to the module.

- **Minor**: Where a clause of the module has not been fully met but, on the basis of objective evidence, the conformity of the product or service to the module is not in doubt.

4.5.2 Procedures for handling non-conformities

Following identification of any non-conformities against the requirements of the module, the company must undertake corrective action to remedy the immediate issue (correction). The process for 'closing out' non-conformities depends upon the level of non-conformity and the number of non-conformities identified.

Critical non-conformities
If a critical non-conformity is identified against a requirement of the module, then the site cannot be certificated for this module without a further full audit of the module.

Where this occurs at a site that already holds certification for the module, certification of the module must be immediately withdrawn.

If it is a requirement of customers that they shall be informed when their suppliers have a critical non-conformity identified or fail to gain certification against the module, the company shall immediately inform its customers.

Note a critical non-conformity against a requirement of the module does not necessarily prevent certification against the Standard.

Major and Minor Non-Conformities
The module cannot be included on a certificate until major and minor non-conformities have been demonstrated as having been corrected, either permanently or via a temporary solution that is acceptable to the certification body.

Close-out of non-conformities can be achieved either by objective evidence being submitted to the certification body, such as updated procedures, records, photographs or invoices for work undertaken, or by the certification body undertaking a further on-site visit.

If satisfactory evidence is not provided within the 28-day (90 days for the initial audit to the BRC Global Standard for Agents and Brokers) calendar period allowed for submission following the audit, certification for the module will not be granted. The company will then require a further full audit in order to be considered for certification to the module.

The certification body will review objective evidence of corrective action completed prior to awarding a certificate.

4.6 Grading

There will be no grading of the module. The module will either be certificated or not.

Any non-conformities identified when assessing the voluntary module may be taken into account when deciding the grade for certification against the Global Standard for Agents and

Brokers, if the company is under compliance deadlines as identified by the Food and Drug Administration (FDA).

Any non-conformities identified when assessing the FSMA Preparedness Module, and not closed out, shall have no impact on certification to the Global Standard.

4.7 Audit Reporting

Following each audit, a written report shall be prepared in the agreed format for the module and this will form an addendum to the Global Standard for Agents and Brokers audit report. The addendum report shall be produced in English as a minimum, with the addition of any other language as required by the audited company.

The report covering the requirements for the module shall be prepared and uploaded onto the BRC Directory within 42 days of the completion of the full audit (within 104 days if this is the initial audit of the company to the Global Standard for Agents and Brokers).

The full BRC Global Standards audit report together with the addendum for the FSMA Controls Preparedness Module shall be uploaded to the BRC Directory in a timely manner irrespective of whether a certificate is issued. The owner of the audit report may allocate access to the audit report with the addendum to customers or other parties in the Directory.

The audit report and associated documentation including auditor's notes shall be stored safety and securely for a period of 5 years by the certification body.

4.8 Certification

After a review of the audit report for the module and documentary evidence provided in relation to the non-conformities identified, a certification decision shall be made by the designated, independent certification manager. Where certification is granted a certificate for FSMA shall be issued in the specified format and issued by the certification body within 42 calendar days of the audit (104 calendar days for a company's initial audit to the Standard).

Note that the module is certificated as an addendum to the Global Standard for Agents and Brokers. Where certification to the Global Standard for Agents and Brokers is not achieved, certification for the module cannot be awarded irrespective of whether the requirements of the module have been met.

4.9 Ongoing Audit Frequency and recertification – scheduling re-audit dates

If certification to the module is to be maintained, the module shall be included within each subsequent audit of the Global Standard for Agents and Brokers. The rules for scheduling the next audit and maintaining certification will follow the audit choice for the rest of the Standard (ie announced or unannounced).

5 BRC Global Standards Logos

Achieving BRC Global Standards certification is something of which to be proud. Companies that achieve certification are qualified to use the BRC Global Standards logo on company stationery and other marketing materials. Information and conditions relating to the use of the BRC Global Standards logo are available at **www.brcglobalstandards.com**

If a company is no longer certificated because of certificate expiry, withdrawal or suspension, it shall no longer use the logo or display any certificate claiming certification.

The BRC Global Standards logo is **not** a product certification mark and shall not be used on products or product packaging. Any certificated company found to be misusing the mark will be subject to the BRC Global Standards complaints/referral process and may risk suspension or removal of its certification.

6 The BRC Global Standards Directory

6.1 Introduction

The BRC Global Standards Directory (**www.brcdirectory.com**) is an online searchable directory of companies certificated to the BRC Global Standards. Each entry includes relevant company details, contact information and certification information. The Directory also includes details of certification bodies approved by BRC Global Standards.

The Global Standards Directory was developed to publicise the list of certificated companies, provide key information to retailers and other specifiers, and improve the management of the BRC Global Standards scheme. It provides a system of data storage of audit information, both live and archived. Data is centrally managed and controlled to maintain accuracy and integrity.

6.2 Directory functionality

The Directory provides the following publicly available facilities:

- a searchable list of certificated companies, including contact details, the standards against which they are certificated, their scope and links to their websites
- a searchable list of approved certification bodies, including local offices and contact details.

Note that whilst all reports and certificate details shall be uploaded to the Directory, companies may choose not to appear on the public directory site if they so wish. This will not, however, exempt companies from the registration fee.

The Global Standards Directory provides additional functionality to key user groups, including companies, retailers and certification bodies. This includes user-specific access to certification information, audit reports and management reporting, further enhancing the value of obtaining BRC Global Standards certification.

7 Surveillance of Certificated Companies

For certificated companies, where deemed appropriate, the certification body or BRC Global Standards may carry out further audits or question activities to validate continued certification at any time. These visits may take the form of announced or unannounced visits to undertake either a full or part audit.

Any non-conformities identified at a visit must be corrected and closed out within the normal protocol, i.e. within 28 days of the visit, reviewed and accepted by the certification body. If there is no intention on behalf of the company to take appropriate corrective actions or the corrective actions are deemed inappropriate, certification shall be withdrawn. The ultimate decision to suspend or withdraw certification remains with the certification body. Any change in certification status shall be notified to BRC Global Standards by the certification body and the status on the BRC Directory amended accordingly.

In the event that certification is withdrawn or suspended by the certification body, the company shall immediately inform its customers and make them fully aware of the circumstances relating to the withdrawal or suspension. Information on the corrective actions to be taken in order to reinstate certification status will also be provided to customers.

8 Communication with Certification Bodies

In the event of any change in circumstances within the company that may affect the validity of continuing certification, the company must immediately notify the certification body. This may include:

- legal proceedings with respect to product safety or legality
- product recall
- change of ownership.

The certification body in turn shall take appropriate steps to assess the situation and any implications for the certification, and shall take any appropriate action.

Information shall be provided to the certification body by the company on request, so that an assessment can be made as to the effect on the validity of the current certificate.

The certification body may as appropriate:

- confirm that the validity of the certificate is not affected
- suspend the certificate pending further investigation
- require further details of corrective action taken by the company
- undertake a visit to verify the control of processes and confirm continued certification
- withdraw the certificate
- issue a new certificate with the new owner's details.

Changes to the certificate or certification status of a company shall be recorded in the BRC Directory.

9 Appeals

The company has the right to appeal against the certification decision made by the certification body. Any appeal should be made in writing to the certification body within seven calendar days of receipt of the certification decision.

The certification body shall have a documented procedure for the consideration and resolution of appeals against the certification decision. These investigative procedures shall be independent of the individual auditor and certification manager. Individual certification bodies' documented appeals procedures will be made available to the company on request. Appeals will be finalised within 30 calendar days of receipt. A full written response will be given after the completion of a full and thorough investigation into the appeal.

In the event of an unsuccessful appeal, the certification body has the right to charge costs for conducting the appeal.

Section IV

Management and Governance of the Scheme

1 Requirements for Certification Bodies

The *Global Standard for Agents and Brokers* is a product and services certification scheme. In this scheme, businesses are certificated upon completion of a satisfactory audit by an auditor employed by an independent third party – the certification body. The certification body in turn shall have been assessed and judged as competent by a national accreditation body.

The process of certification and accreditation is outlined in Figure 2.

In order for a business to receive a valid certificate on completion of a satisfactory audit, the organisation must select a certification body approved by BRC Global Standards. BRC Global Standards lays down detailed requirements that a certification body must satisfy in order to gain approval.

As a minimum, the certification body must be accredited to ISO/IEC 17065 by a national accreditation body affiliated to the International Accreditation Forum and recognised by BRC Global Standards.

Further details are available in the document *Requirements for Organisations Offering Certification against the Criteria of the BRC Global Standards*, available from BRC Global Standards on request.

Companies looking to become certificated to the Standard should assure themselves that they are using a genuine certification body approved by BRC Global Standards. A list of all the approved certification bodies is available in the BRC Global Standards Directory at **www.brcdirectory.com**

BRC Global Standards recognises that in certain circumstances – for example, when new standards are introduced, or there are new certification bodies wishing to commence auditing against the Standard – accreditation may not yet have been achieved. This is because the accreditation process itself requires some audits to have been completed, which will then be reviewed as part of the accreditation audit of the certification body. The certification body must be able to conduct audits as part of the accreditation process and so some unaccredited audits will be performed. These will be permitted where the organisation can demonstrate that:

- it has an active application for accreditation against ISO/IEC 17065 from an approved national accreditation body
- accreditation will be achieved within 12 months of the date of application and the experience and qualifications of the auditors in the relevant product category are consistent with those specified by BRC Global Standards
- a contract is in place with BRC Global Standards and all other contracted requirements have been met.

The acceptance of audit reports and certificates generated by certification bodies awaiting accreditation but meeting the above criteria is at the discretion of individual specifiers.

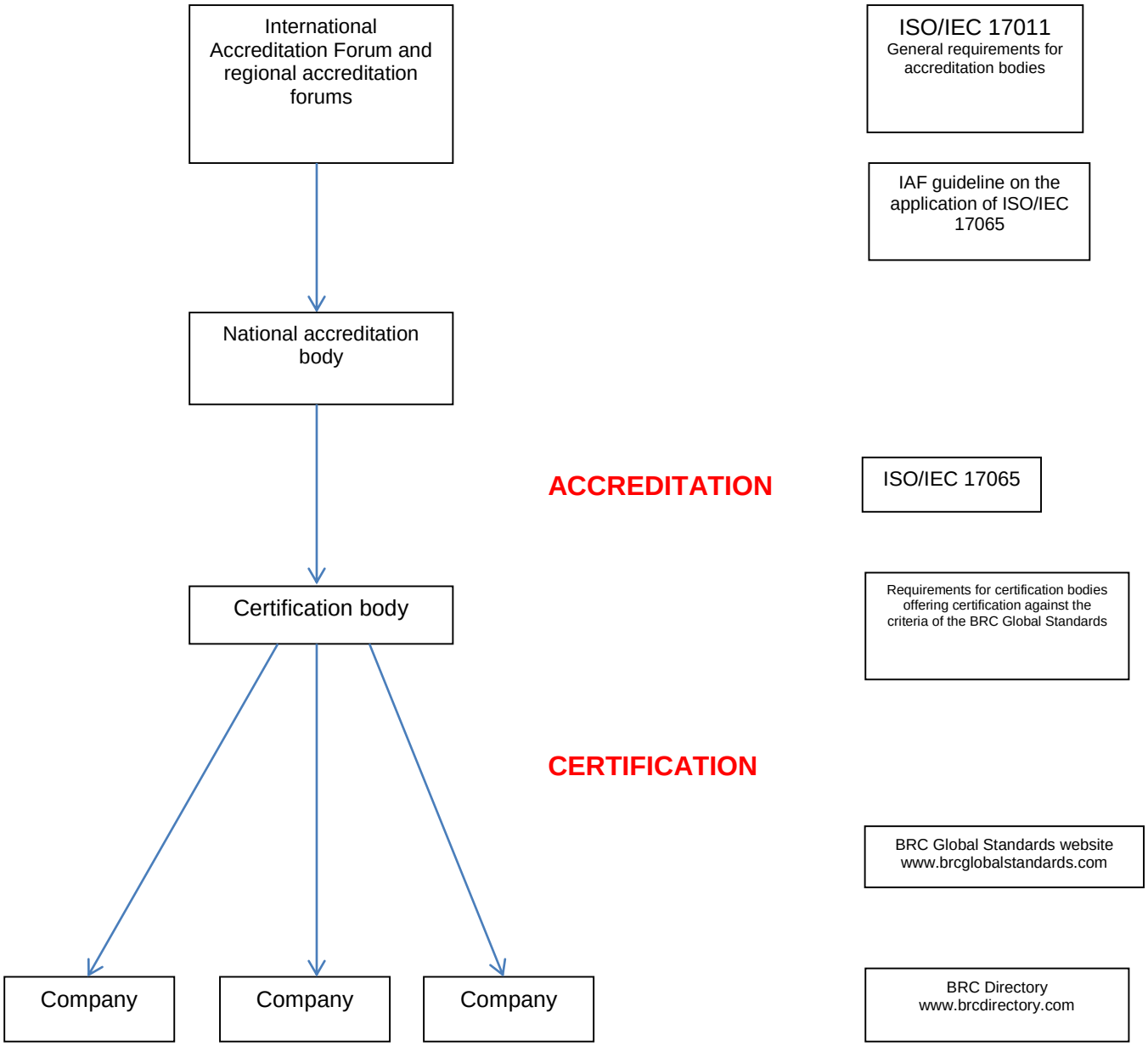

Figure 2: Process of certification and accreditation

2 Technical Governance of the *Global Standard for Agents and Brokers*

The Standard and associated scheme is managed by BRC Global Standards and is governed through a number of committees, each of which works to defined terms of reference. Figure 3 shows the technical governance structure for the management of the BRC's global standards.

2.1 International Advisory Board

The technical management and operation of the Standard is governed by the BRC Global Standards International Advisory Board, consisting of senior technical representatives of international retail and food manufacturing businesses.

The functions of the International Advisory Board are:

- to advise on the development and management of the global standards
- to ensure measures are in place to monitor compliance by companies, certification bodies and accreditation bodies.

2.2 Technical Advisory Committee

Each BRC Global Standard is supported by at least one Technical Advisory Committee (TAC), which meets regularly to discuss technical, operational and interpretational issues related to the Standard. BRC Global Standards provides the technical secretariat for these groups.

The TAC is made up of senior technical managers representing the users of the Standard and includes representatives of retailers, food manufacturers, trade associations, certification bodies and independent technical experts.

The Standard is reviewed every three years to assess the need for updating or production of a new issue. This work is undertaken by the TAC, which is expanded for the purpose to include other available expertise.

The TAC also reviews auditor competence requirements, proposed training materials and supplementary technical documents supporting the standards.

2.3 Certification body co-operation groups

BRC Global Standards encourages and facilitates meetings of the certification bodies participating in the scheme (cooperation groups) to discuss matters arising from the implementation of the Standard and issues of interpretation. These groups report regularly to BRC Global Standards on operational issues, implementation and suggested improvements. Representatives from the cooperation groups attend the TAC meetings.

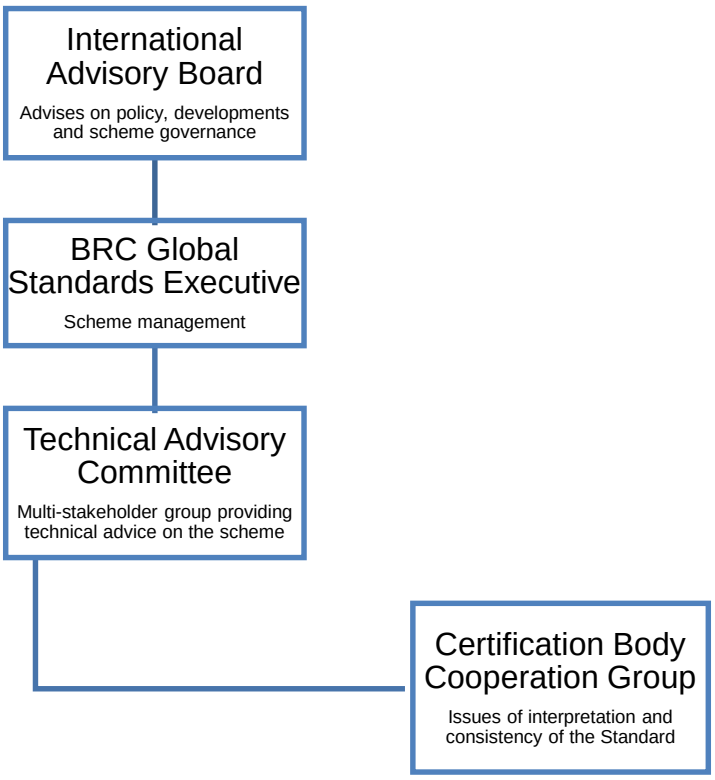

Figure 3: Technical governance structure for management of the standards

3 Achieving Consistency – Compliance

The maintenance of a high and consistent standard of audit and certification and the ability of the certificated companies to maintain the standards achieved at the audit are essential to ensure confidence in the scheme and to the value of certification. BRC Global Standards therefore has an active compliance programme to supplement the work of accreditation bodies and ensure high standards are maintained.

The BRC Global Standards scheme may only be provided by certification bodies registered and approved by BRC Global Standards and accredited by a BRC Global Standards-recognised accreditation body. All auditors undertaking audits against the Standard must meet the auditor competency requirements and shall be registered with BRC Global Standards. All audits undertaken against the Standard shall be uploaded to the BRC Directory, which provides BRC Global Standards with an oversight of the activity of the certification bodies and the opportunity to review the quality of the reports produced.

To support the Standard, BRC Global Standards operates a compliance programme, which reviews the performance of the certification bodies, samples the quality of audit reports and levels of understanding of the scheme requirements, and investigates any issues or complaints. As part of this programme BRC Global Standards provides feedback on the performance of each certification body through a key performance indicator (KPI) programme.

BRC Global Standards audit the offices of certification bodies and accompany auditors on audits at sites to observe their performance. The BRC Global Standards also undertake independent visits to certificated companies to ensure standards of product safety and quality are being maintained in line with their certification status and to ensure that the audit and reporting process is to the expected standard.

3.1 Calibrating auditors

A key component of the scheme is the calibration of auditors to ensure a consistent understanding and application of the requirements. All certification bodies are required to have processes to calibrate their own auditors. An essential element of the training and calibration of auditors is the witnessed audit programme. Auditors are observed during an audit and provided with feedback on the performance of the audit. In order to ensure consistency between certification bodies and for the purposes of accreditation, an audit may be witnessed by a BRC Global Standards representative or accreditation body auditor. Guidelines apply to these activities to ensure that companies are not disadvantaged by the presence of two auditors. This process forms an essential part of the scheme and companies are obliged to permit witnessed audits as part of the conditions for certification.

3.2 Feedback

Companies audited against the Standard may wish to provide feedback to the certification body or BRC Global Standards on the performance of the auditor. Such feedback sent to BRC Global Standards will be considered in confidence. Feedback provides a valuable input to BRC Global Standards monitoring programme for certification-body performance.

3.3 Complaints and referrals

BRC Global Standards has implemented a formal complaint and referral process, which is available to organisations involved with the global standards. A document detailing the global standards complaints process can be found on the website **www.brcglobalstandards.com**

From time to time, failure to apply the principles and criteria of the BRC Global Standards at certificated companies may be reported to BRC Global Standards by, for example, retailers and companies conducting their own audits. In this event, BRC Global Standards will conduct an investigation which may include, as appropriate, a visit to the site by BRC Global Standards, either announced or unannounced or requesting the certification body to investigate; which may also include a visit to the site. BRC Global Standards will require a full investigation of the issues raised and a report from the certification body submitted to BRC Global Standards within 28 calendar days (or shorter time in urgent cases).

APPENDICES

Appendix 1

BRC Participate

BRC Participate is a powerful document information management system that allows the BRC Global Standards to deploy the content from its full range of BRC Global Standards, Guidelines and Additional Modules through all digital channels. The service is a managed subscription based online service which subscribers can access to view content online. BRC Participate also maintains traditional channels of print on demand and purchasable PDF downloads.

BRC certificated sites and other Standard users are able to access the Global Standards publications content and other supporting information seamlessly, in a highly tailored and contextualized experience, across a myriad of channels and devices.
Other BRC Participate features include:

- Mapping Standard clauses to the relevant clause of the Interpretation Guideline
- Multi-format publications
- Automation of manual document distribution
- Multi-lingual content
- Searchable content
- Automatic updates and notifications of changes to documents
- 24/7 worldwide access on web enabled devices using a secure password system

To learn more please visit www.brcparticipate.com

Appendix 2

Qualifications, Training and Experience Requirements for Auditors

The following are the minimum requirements for auditors to conduct audits against the BRC *Global Standard for Agents and Brokers*.

Education and work experience

The auditor is required to have a background of education and work experience related to the food, packaging or logistics industry.

This shall involve work in quality assurance, technical management or risk management functions within manufacturing, logistics, retailing, inspection or enforcement, at a managerial, decision making level. Auditing and consultancy experience shall also be considered.

A degree or diploma in a food-related, packaging, bioscience discipline or other relevant subject is not required, but where such a qualification is not in place then an increased period of work experience is required.

Lead Auditor Qualification

The auditor must have a recognised auditor qualification, including training on quality management systems, of 40 hours' duration with an examination. Examples of recognised courses are:

- IRCA recognised Management System Lead Assessor Course
- 'ASQ Certified Quality Auditor' or Exemplar Global qualification
- BRC Third Party Auditing course delivered by a BRC Approved Trainer

Other schemes such as SQF and IFS lead auditor training is also accepted.

HACCP or Hazard and Risk Assessment Training

The auditor should have completed a training course in hazard and risk assessment, such as hazard analysis and critical control point (HACCP) based on the principles of Codex Alimentarius, of at least two days' duration. It is essential that the course is recognised by the industry as being appropriate and relevant.

In exceptional cases, where the auditor can demonstrate practical use and application, within the previous 5 years to a high level eg being a recognised trainer of HACCP, then a formal training course may not be required.

BRC Global Standard Agents and Brokers Issue 2 Qualification

Auditors must have successfully completed specific Standards training through:

- An online 'protocol and report writing' course applicable to one of the BRC Standards
- The one day BRC Global Standards Agents and Brokers training course delivered by a BRC Global Standards approved trainer

and their corresponding examinations.

Audit Training

The certification body shall assess the audit background of the auditor and develop an individually tailored training programme. Consideration shall be given to relevant experience from internal audits, second party, third party and GFSI recognised audit schemes, as well as the variety of site and process types. It is expected that trainee auditors will have completed a significant number of relevant audits within the previous 2 years (>10 third party audits, which include hazard and risk assessment (eg HACCP), Quality Management Systems and Good Manufacturing Practices).

As a minimum, trainee auditors shall have completed supervised, practical assessment, training of at least one audit in the BRC Global Standard for Agents and Brokers. In addition, auditors shall be 'signed off' as competent through a successful witness audit adhering to the requirements specified in BRC Global Standard Guidelines for Certification Bodies for Ensuring Auditor Competence through Witness Audits.

Certification bodies must be able to demonstrate that every auditor has appropriate training and experience for the particular categories for which they are considered competent. Auditor competence shall be recorded at least at the level of each category as indicated in Appendix 3.

Responsibility of the Certification Body

It is the responsibility of the certification body to ensure processes are in place to monitor and maintain the competence of the auditor to the level required by the Standard.

Appendix 3
Product Categories

The audit requires product technical knowledge in order to assess the appropriateness of the agent's/broker's processes for the approval and evaluation of product and service suppliers.

The following product examples are given as guidance only; this is not an exhaustive list:

	Category Number	Product Category	Category Description
Food Products	1	Chilled and frozen food	• Raw meat, fish and prepared food • Fruit and vegetables, prepared and fresh • Dairy • Ready-to-eat chilled and frozen products
	2	Ambient food	• Canned and jarred products • Alcoholic and non-alcoholic drinks • Ambient grocery products
Packaging	3	Packaging materials	• Glass • Paper • Metals • Plastics • Wood and other materials
Consumer Products	4	Personal care, household and general merchandise	Formulated and fabricated products such as cosmetics, food wrap or household cleaners, electrical equipment, toys, furniture, textiles and jewellery

It is the responsibility of the business to ensure that adequate and accurate information is given to the certification body, detailing the products it handles, to enable the certification body to select an appropriate auditor with the required product knowledge to undertake the audit.

Certification bodies must be able to demonstrate that every auditor has appropriate training and experience for the particular categories for which they are considered competent.

When selecting an auditor for a specific audit, the certification body must ensure that the auditor meets the product category requirements listed above and has product experience as closely aligned to the businesses product range as practical. For example, if a broker deals solely in red meat then the auditor must be approved for category 1 (above) and should have experience of the red meat industry. Where a broker handles multiple products within a single category eg multiple chilled products such as red meat, poultry and dairy then the auditor is expected to be approved for category 1 and should have experience of at least one of the product types.

Appendix 4

Certificate Template

The certificate shall conform to the format shown below. Logos used on the certificate (eg BRC Global Standards and accreditation body logos), shall comply with the respective rules of use. In addition:

- the certificate will detail the scope of the audit. The certificate shall be issued to the company and include the location of the office(s) applicable.
- Where a certificate is issued for a multiple office organisation the addresses of each office within the audit scope shall be included on the certificate.
- The certificate will include the six-digit auditor registration number of the lead auditor.
- The date(s) of audit specified on the certificate shall be the date of the audit relating to the granting of the certificate, irrespective of whether later visits were made to verify corrective action arising from the audit.

Whilst the certificate is issued to the company, it remains the property of the certification body, which controls its ownership, use and display.

Certificate Template:

Auditor number

[Certification body name, certification body number] certifies that, having conducted an audit

For the scope:

Product categories:

At COMPANY NAME

SITE CODE

AUDIT SITE ADDRESS

Associated offices

Offices included within certification (this may also be presented as an appendix to the certificate)
Has achieved the Grade:

Meets the requirements set out in the

GLOBAL STANDARD for AGENTS and BROKERS
ISSUE 2: AUGUST 2017

Audit programme: [announced, unannounced]

Date(s) of audit: [if an extension to scope, include original audit date and visit date]

Certificate issue date:

Re-audit due date: from to

Certificate expiry date:

_____
Authorised by

Accreditation body logo

BRC Global Standards logo

Name and full address of certification body
Certificate traceability reference
This certificate remains the property of (name of certification body)
If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC Global Standards, please contact enquiries@brcglobalstandards.com or call Tell BRC Hot Line +44 (0)20 7717 5959.

To verify certificate validity please visit www.brcdirectory.com

Appendix 5

Certificate Validity, Audit Frequency and Planning

Examples of Certificate Validity – Announced Audit Option

NB this example assumes that the company has a successful audits and achieves an AA, A or B grades. For information on audit frequencies for grade C or unsuccessful audits refer to Protocol Section 2.4.

Audit	Event	Date	Explanation
Initial audit (Audit 1)	Initial audit date	1 February 2017	
	Certificate issue date	16 May 2017	The company takes 90 days to submit all corrective actions (maximum permitted time for an initial audit) The certification body takes 14 days to issue the certificate (maximum permitted)
	Certificate expiry date	16 May 2018	Anniversary of the initial audit date plus 104 days
	Re-audit due date	4 January to 1 February 2018	12 months from the (first day of the) initial audit, including 28-day audit window
Re-certification audit (Audit 2)	Actual re-audit visit	26 January 2018	Company is allowed a 28-day window before the audit due date
	Certificate issue date	25 February 2018	The company takes 20 days to submit all corrective actions (28 days allowed) The certification body takes 10 days to issue the certificate (14 days allowed)
	Certificate expiry date	14 March 2019	This is 24 months plus 42 days from the initial audit date. This allows the company to take the audit up to 28 days early without losing time from the certificate

Examples of Certificate Validity – Unannounced Audit Option

NB this example assumes that the company has a successful audits and achieves an AA, A or B grades. For information on audit frequencies for grade C or unsuccessful audits refer to Protocol Section 2.4.

Audit	Event	Date	Explanation
Initial audit (Audit 1)	Initial audit date	1 February 2017	
	Certificate issue date	16 May 2017	The company takes 90 days to submit all corrective actions (maximum permitted time for an initial audit) The certification body takes 14 days to issue the certificate (maximum permitted)
	Certificate expiry date	16 May 2018	Anniversary of the initial audit date plus 104 days
	Re-audit due date	4 January to 1 February 2018	12 months from the (first day of the) initial audit, including 28-day audit window
	Site opts into the unannounced audit scheme	By 1 May 2017	Site must notify their certification body within 3 months of last audit date if they wish to enter the unannounced audit programme
Re-certification audit (Audit 2) Unannounced audit option	Unannounced audit will take place	Between 1 May 2017 and 1 February 2018	Audit occurs between 3 and 12 months after the initial audit
	Actual re-audit date	1 October 2017	
	Certificate issue date	31 October 2017	For this example: The company has taken 20 days to submit all corrective actions (28 days allowed). The certification body takes 10 days after receipt of the corrective actions to issue the certificate (14 days allowed). Certificate supersedes the previous certificate.
	Certificate expiry date	14 March 2019	24 month anniversary of the initial audit plus 42 days if remaining in the unannounced scheme
	Re-audit due date on certificate	Between 1 May 2018 and 1 February 2019	Assuming the company stays in the unannounced audit programme: The audit must be completed by 24 months after the first day of initial audit. But typically takes place within the final 8 months of this period.

Appendix 6
Glossary

Accreditation	The procedure by which an authoritative body gives formal recognition of the competence of a certification body to provide certification services against a specified standard.
Agent/non-manufacturing service provider	A company that facilitates trade between a manufacturer or broker and their customer through the provision of services, but does not at any point own or take title to the goods.
Allergen	A known component of food which causes physiological reactions due to an immunological response, e.g. nuts and others identified in legislation relevant to the country of production or sale. Allergens defined by the EU are: celery and products thereof cereals containing gluten (wheat, rye, barley, oats, spelt, kamut or their hybridised strains) and products thereof crustaceans and products thereof eggs and products thereof fish and products thereof lupin and products thereof milk and products thereof molluscs and products thereof mustard and products thereof nuts: almond (*Amygdalus communis* L), hazelnut (*Corylus avellana*), walnut (*Juglans regia*), cashew (*Anacardium occidentale*), pecan (*Carya illinoiesis* (Wangenh.) K Koch), brazil (*Bertholletia excelsa*), pistachio (*Pistacia vera*), macadamia and Queensland (*Macadamia ternifolia*) and products thereof peanuts and products thereof sesame seeds and products thereof soybeans and products thereof sulphur dioxide and sulphites at concentrations of more than 10 mg/kg or 10 mg/litre expressed as SO_2. Refer to: Directive 2006/142 EC of 22 December 2006 amending Directive 2000/13/EC.

Announced audit	An audit where the company agrees the scheduled audit day in advance with the certification body.
Assured status	Products produced in accordance with a recognised product certification scheme, the status of which needs to be preserved through the BRC Global Standard certificated production facility, e.g. GlobalGAP.
Audit	A systematic examination to substantiate whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.
Branded food products	Pre-packaged food products bearing the logo, copyright and address of a company which is not a retailer.
Broker	A company which purchases or 'takes title to' products for resale to businesses, e.g. manufacturers, retailers or food service companies, but not to the ultimate consumer.
Business continuity	A framework which enables an organisation to plan and respond to incidents of business interruption in order to continue business operations at an acceptable predetermined level.
Calibration	A set of operations that establish, under specified conditions, the relationship between values of quantities indicated by a measuring instrument or measuring system, or values represented by a material measure or reference material, and the corresponding values realised by standards.
Certificate withdrawal	Where certification is revoked.
Certification	The procedure by which an accredited certification body, based on an audit and assessment of a company's competence, provides written assurance that a company conforms to a standard's requirements.
Certification body	A provider of certification services, accredited to do so by an authoritative body.
Codex Alimentarius Commission	A body responsible for establishing internationally recognised standards, codes of practice and guidelines, of which HACCP (Hazard Analysis and Critical Control Point) is one standard.
Company	The person, firm, company or other entity with which a confirmed purchase order is placed, or which owns premises where products in whatever form originate, or which is otherwise responsible for employing or procuring the services of food handlers in the production and preparation of food.

Competence	Demonstrable ability to apply skill, knowledge and understanding of a task or subject to achieve intended results.
Contamination	The introduction or occurrence of an unwanted organism, taint or substance in food or the food environment. Contamination includes physical, chemical, biological and allergen contamination. Contamination can also mean incorrect mixing of packages.
Control measure	Any action or activity that can be used to prevent or eliminate a food safety hazard or reduce it to an acceptable level.
Cook	A thermal process designed to heat a food item to a minimum of 70ºC for two minutes or equivalent.
Corrective action	Action to eliminate the cause of a detected non-conformity deviation.
Critical Control Point (CCP)	A step at which control can be applied and is essential to prevent or eliminate a food safety hazard or reduce it to an acceptable level.
Customer	A business or person to which a product has been provided, either as a finished product or as a component part of the finished product.
Customer focus	A structured approach to determining and addressing the needs of an organisation to which the company supplies products and which may be measured by the use of performance indicators.
Distressed stock	Product that is safe and meets all relevant legal requirements, but will be sold to an alternative customer as it doesn't meet the requirements of the original (planned) customer (eg due to quality attributes or customer specific policy).
End consumer	The ultimate consumer of a foodstuff, who will not use the food as part of any food-business operation or activity.
Exporter	A company facilitating the movement of products out of a country, across an international border.
Factored goods	Goods not manufactured or part-processed on site but bought in and sold on.
Final manufacturer	The site where the last processing act is undertaken on a product before supply to the agent or broker.
Flow diagram	A systematic representation of the sequence of steps or operations used in the production or manufacture of a particular food item.

Food handler	Anyone who handles or prepares food, whether open (unwrapped) or packaged.
Food safety	Assurance that food will not cause harm to the consumer when it is prepared and/or eaten according to its intended use.
Genetically modified organism (GMO)	An organism whose genetic material has been altered by the techniques of genetic modification so that its DNA contains genes not normally found there.
Good manufacturing practice (GMP)	Implemented procedures and practices undertaken against best-practice principles.
Hazard	A biological, chemical, physical or allergenic agent in food, or a condition of food, with the potential to cause an adverse health effect.
Hazard Analysis and Critical Control Point (HACCP)	A system that identifies, evaluates and controls hazards which are significant for food safety.
Hazard and Risk Analysis	A system that identifies, evaluates and controls hazards which are significant for product safety. Techniques include HACCP (Hazard Analysis and Critical Control Point), HARPC (Hazard Analysis and Risk-Based Preventive Controls) or HARM
High-care area	An area designed to a high standard where practices relating to personnel, ingredients, equipment, packaging and environment aim to minimise product contamination by pathogenic micro-organisms.
High-care product	A product that requires chilling or freezing during storage, is vulnerable to the growth of pathogens, has received a process to reduce the microbiological contamination to safe levels (typically 1–2 log reduction) and is ready to eat or heat.
High-risk area	A physically segregated area, designed to a high standard of hygiene, where practices relating to personnel, ingredients, equipment, packaging and environment aim to prevent product contamination by pathogenic micro-organisms.
High-risk product	A chilled ready-to-eat/ready-to-heat product or food where there is a high risk of growth of pathogenic micro-organisms.
Identity preserved	A product that has a defined origin or purity characteristic which needs to be retained throughout the food chain, e.g. through traceability and protection from contamination.

Importer	A company facilitating the movement of products across an international border. Usually the first recipient of the products in that country.
Incident	An event that results in the production or supply of unsafe, illegal or non-conforming product.
Initial audit	The first BRC Global Standard audit at a company/site.
Internal audit	The general process of audit, for all the activity of the company. Conducted by or on behalf of the company for internal purposes.
Job description	A list of the responsibilities for a given position at a company.
Low-risk area	An area where the processing or handling of foods presents minimum risk of product contamination or growth of micro-organisms, or where the subsequent processing or preparation of the product by the consumer will ensure product safety.
Non-conformity	The non-fulfilment of a specified product safety, legal or quality requirement or a specified system requirement.
Office	For the purposes of this Standard, an office is a dedicated workplace where two or more people work, that has accessibility to company files and is a registered postal address for the company.
Performance indicators	Summaries of quantified data that provide information on the level of compliance against agreed targets, e.g. customer complaints, product incidents, laboratory data.
Prepared primary product	A food product which has undergone a washing, trimming, size-grading or quality-grading process and is pre-packed.
Prerequisite	The basic environmental and operational conditions in a food business that are necessary for the production of safe food. These control generic hazards covering good manufacturing practice and good hygienic practice and shall be considered within the HACCP study.
Primary packaging	Packaging which is in direct contact with food.
Procedure	An agreed method of carrying out an activity or process, which is implemented and documented in the form of detailed instructions or process description (e.g. a flowchart).

Processed food	A food product which has undergone any of the following processes: aseptic filling, baking, battering, blending, bottling, breading, brewing, canning, coating, cooking, curing, cutting, dicing, distillation, drying, extrusion, fermentation, freeze drying, freezing, frying, hot filling, irradiation, microfiltration, microwaving, milling, mixing, being packed in modified atmosphere, being packed in vacuum packing, packing, pasteurisation, pickling, roasting, slicing, smoking, steaming or sterilisation.
Processing aids	Any substance not consumed as a food by itself, intentionally used in the processing of raw materials, foods or their ingredients to fulfil a certain technological purpose during treatment or processing, and which may result in the unintentional but technically unavoidable presence of the residues of the substance or its derivatives in the final product, provided that these residues do not present any health risk and do not have any technological effect on the finished product.
Product recall	Any measures aimed at achieving the return of an unfit product from final consumers and customers.
Product withdrawal	Any measures aimed at achieving the return of an unfit product from customers but not final consumers.
Provenance	The origin or the source of food or raw materials.
Quantity check/mass balance	A reconciliation of the amount of incoming raw material against the amount used in the resulting finished products, also taking into account process waste and rework.
Ready-to-cook food	Food designed by the manufacturer as requiring cooking or other processing effective to eliminate or reduce to an acceptable level micro-organisms of concern.
Ready-to-eat food	Food intended by the manufacturer for direct human consumption without the need for cooking or other processing effective to eliminate or reduce to an acceptable level micro-organisms of concern.
Ready-to-reheat food	Food designed by the manufacturer as suitable for direct human consumption without the need for cooking, but which may benefit in organoleptic quality from some warming prior to consumption.
Recognised laboratory accreditation	Laboratory accreditation schemes that have gained national and international acceptance, awarded by a competent body and recognised by government bodies or users of the Standard, e.g. ISO 17025 or equivalents.
Retail brand	A trademark, logo, copyright or address of a retailer.
Retailer	A business selling food to the public by retail.

Retailer-branded food products	Food products bearing a retailer's logo, copyright or address; ingredients used to manufacture within a retailer's premises; or products that are legally regarded as the responsibility of the retailer.
Risk analysis	A process consisting of three components: risk assessment, risk management and risk communication.
Risk assessment	The identification, evaluation and estimation of the levels of risk involved in a process to determine an appropriate control process.
Root cause	The underlying cause of a problem, which, if adequately addressed, will prevent a recurrence of that problem.
Seasonal production site	A product manufactured, processed or harvested at a site that is opened specifically for the duration of that short term production (typically 12 weeks or less) during a 12-month cycle.
Shall	Signifies a requirement to comply with the contents of the clause.
Should	Signifies that compliance with the contents of the clause is expected or desired.
Site	A unit of the company.
Standard, the	The BRC *Global Standard for Agents and Brokers*, Issue 2.
Stock reconciliation	The process by which the location and quantity of raw material, intermediate product and finished product is identified and matched to product schedules and quantities.
Sub-contracted service provider	Any company or organisation which the agent/broker sub-contracts to provide a customer-focused service. For example, sub-contracted storage or distribution of product and re-processing or re-labelling of products.
Supplier	The person, firm, company or other entity to which a company's purchase order to supply is addressed.
Suspension	Where certification is revoked for a given period pending remedial action on the part of the company.
Take title to	To purchase or become the legal owner of the product
Traceability	The ability to trace and follow a food, feed, food-producing animal or raw material intended to be, or expected to be, incorporated into a food, through all stages of receipt, production, processing and distribution.
Trend	An identified pattern of results.

Unannounced audit	An audit undertaken on a date unknown to the company in advance. Two options are provided by the Standard.
User	The person or organisation that requests information from the company regarding certification.
Utilities	Commodities or services, such as electricity or water, that are provided by a public body.
Validation	Obtaining evidence through the provision of objective evidence that a control or measure, if properly implemented, is capable of delivering the specified outcome.
Verification	The application of methods, procedures, tests and other evaluations, in addition to monitoring, to determine whether a control or measure is or has been operating as intended.
Where appropriate	In relation to a requirement of the Standard, the company will assess the need for the requirement and, where applicable, put in place systems, processes, procedures or equipment to meet the requirement. The company shall be mindful of legal requirements, best-practice standards, good manufacturing practice and industry guidance, and any other information relating to the manufacture of safe and legal product.
Wholesaler	A distributor or middleman who purchases products to sell mainly to retailers, institutions or other companies rather than to consumers.

Appendix 7
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