Plant-Based Certification Program Global Standard

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BRC Global Standards

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BRC Global Standards would like to thank all the producers, manufacturers, distributors, retailers, health professionals, and product specialists, who participated in the development of this issue of the PBCP Global Standard. This Standard draws heavily from materials and processes used by competent authorities, recognized worldwide, that promote the use of HACCP (Hazard Analysis and Critical Control Point) principles or the equivalent.

PART I

THE PLANT-BASED MANAGEMENT SYSTEM

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PART I

THE PLANT-BASED MANAGEMENT SYSTEM

Introduction

Welcome to the first edition of the Plant-Based Certification Program (PBCP) Global Standard (hereafter referred to as the PBCP Global Standard).

The PBCP Global Standard has been developed in response to a shift in consumer purchasing behavior resulting in the rapidly growing demand for plant-based products. Plant-based products are relatively novel, and the industry has been challenged with meeting consumer demands while also protecting brand reputation and mitigating risk. The PBCP Global Standard provides certainty for industry and consumers alike.

The PBCP Global Standard is based on a comprehensive management system approach and provides framework for manufacturers to assist them in the production of plant-based food. It includes operational criteria required to be in place to ensure plant-based products are free of material of animal origin.

Even the most informed consumer may unknowingly consume animal products or ingredients due to the challenge of correctly identifying animal containing ingredients based on product labeling information alone. The PBCP Global Standard on pack trademark will empower consumers to make informed choices quickly and easily. The trademark will allow brands and products to differentiate themselves.

The Plant-Based Certification Program Global Standard provides confidence to consumers and industry alike.

Scope of the PBCP Global Standard

The PBCP Global Standard applies only to the control of animal inputs in plant-based products, in the manufacture, processing and packing of:

* processed foods, both own brand and customer branded
* ingredients for use by food service companies, catering companies, and food manufacturers
* pet foods (GFSI benchmarked schemes only)
* natural health products

Benefits of a PBMS

The long-term outcome of the PBCP Global Standard is to promote a systems approach to prevent failures that could harm brand reputation. Correctly applied, a site’s PBMS will provide a very strong level of protection from failure, and if failure does occur, it will enable the rapid identification and management of risks and deviations. Increasing the availability of plant-based products will enable market expansion. Consumers will benefit by having increased confidence in their purchases, wider availability, and variety of choice.

Responsibilities of BRC Global Standards

* Develop and maintain a PBCP Global Standard in consultation with consumers, industry, and government stakeholders. Consideration will be given to harmonize with best approaches that have been developed and successfully implemented.
* Recognize the systems that conform to the requirements of the PBCP Global Standard.
* Verify the implementation, effectiveness, and maintenance of the PBMS that manufacturers and distributors have in place.
* Ensure competencies for the recognition and verification of the PBMS developed and implemented by sites.
* Ensure consistency of the evaluation and audit processes as well as the consistency of the verification of conformity.
* Provide the resources to enable the timely evaluation and administration of the PBCP Global Standard.
* Consider any information presented in the conduct of the PBCP Global Standard, such as copies of the PBMS documentation that are obtained by a BRC Global Standards officer or auditor, to be private and confidential, and protect the information to the extent of the law. BRC Global Standards will request only information which is relevant to the administration of the PBCP Global Standard.

Senior management commitment

Within a food business, claim management and integrity must be seen as a cross-functional responsibility that includes activities that draw on many departments, using different skills and levels of management expertise across the organization. Effective plant-based management extends beyond technical departments and must involve commitment from research and development, production operations, engineering, distribution management, procurement, brand management, marketing, customer feedback, and human resource activity such as training.

The starting point for an effective PBMS is the commitment of senior management to the development of an all-encompassing policy to guide the activities that collectively assure the integrity of the plant-based claim. The PBCP Global Standard places a high priority on clear evidence of senior leadership commitment.

A management system approach

The program promotes the use of a management systems approach, to systematically prevent failures. Once in place, a product manufacturer conforming to the PBCP Global Standard will be subject to periodic audits by an independent third party approved by BRC Global Standards. The audit will evaluate the site’s achievement, and any deficiencies, in the application and use of general best practices within its PBCP, with the expectation that conformity can consistently be met.

Certification process

Producers and manufacturers will be evaluated and audited by a third party, a certification body recognized by BRC Global Standards. The audit will evaluate the achievement, and any deficiencies, in the application and use of general best practices within the site’s PBMS, with the expectation that conformity can consistently be met. Upon recognition, sites and their distributors will be licensed to use and apply the PBCP Global Standard trademark, knowing that products bearing the PBCP Global Standard trademark must be sourced from a certified site in good standing.

Guidance and training

BRC Global Standards produces a range of guidance documents, training courses, and a self-assessment tool designed to assist sites with the application of the PBCP Global Standard and understanding of core skills such as risk assessment.

Further information about training courses can be found at www.brcgs.com

PART II

REQUIREMENTS

1. Senior management commitment
2. The Food Safety Plan - HACCP
3. PBMS maintenance and reassessment
4. Documentation and Records
5. Internal audits
6. Supplier approval, purchasing, incoming ingredients and inputs, and performance monitoring
7. Suppliers of Services
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19. Plant-based awareness training

PART II

REQUIREMENTS

All sites shall establish and maintain the environmental and operational programs (prerequisite programs) necessary to create an environment suitable to produce safe and legal food products. In addition, all sites shall conduct a complete hazard analysis, based on Codex HACCP principles, for all of their processes and products in order to identify and control all hazards effectively. Those sites that are not certified in a Global Food Safety Initiative (GFSI) benchmarked scheme must be certified in the BRC START! Programme (intermediate level) or an equivalent global markets program offered by a GFSI benchmarked Standard owner. Certification to a GFSI benchmarked scheme or BRC START may be concurrent with PBCP certification.

1 Senior management commitment

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| **Clause** | **Requirements** |
| 1.1 | The site shall have a current copy of the PBCP Global Standard available. |
| 1.2 | The site must have a valid Schedule A. |
| 1.2 | The site’s senior management shall demonstrate their commitment to meeting the requirements of the PBCP Global Standard by ensuring the sites overall food safety and/or quality management system addresses the elements of the PBMS. This may include, but is not limited to:   * ensuring the letter of commitment or policy addresses the production of plant-based products that conform to the PBCP Global Standard requirements * ensuring management responsibility policies, organization structures, etc., include responsibilities related to the PBMS * designating a qualified individual with appropriate knowledge and training to oversee the PBMS * ensuring the management review process includes the PBMS * ensuring resource management policies accommodate the PBMS |

2 The Food Safety Plan - HACCP

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| **Clause** | **Requirements** |
| 2.1 | The company shall have a fully implemented and effective food safety plan incorporating the Codex Alimentarius HACCP Principles, which includes plant-based products. #### |

3 PBMS maintenance and reassessment

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| **Clause** | **Requirements** |
| 3.1 | The PBMS shall be reviewed at least annually and prior to any changes that may impact the integrity of the plant-based product and claim. This may include:   * change in ingredients or inputs intended for use in plant-based products * change in supplier of ingredients or inputs intended for plant-based products * change in ingredients/recipe * change in processing conditions, process flow, or equipment * change in packaging, storage, or distribution conditions * emergence of a new risk (e.g., known adulteration of an ingredient or other relevant, published information, e.g., a recall of a similar product) * changes required following a recall or withdrawal * new developments in scientific and/or regulatory information associated with ingredients, process, or product * noncompliance identified during monitoring and verification activities * consumer/client complaints * nonconformities identified during PBCP Global Standard audits or surveys done by government agencies such as the national, regulatory competent authority * change in production volume that impacts on the product flow, sanitation schedule, employee training, etc.   Appropriate changes resulting from the review shall be incorporated into the PBMS, communicated appropriately through training, fully documented, and the validation recorded. |

4 Documentation and Records

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| **Clause** | **Requirements** |
| 4.1 | The sites document control policies and procedures shall include the management of documents that form part of the PBMS. This shall include:   * a list of all controlled documents, indicating the latest version number * the method for the identification and authorization of controlled documents * a record of the reason for any changes or amendments to documents * the system for the replacement of existing documents when these are updated.   Where documents are stored in electronic form these shall also be:   * stored securely (e.g., authorized access, control of amendments, password protected)   backed up to prevent loss. |
| 4.2 | Record keeping policies and procedures shall include the management of PBMS records to demonstrate the effective application of the PBCP Global Standard and to facilitate official verifications by the BRC Global Standards approved auditor or other competent authority. |

5 Internal audits

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| **Clause** | **Requirements** |
| 5.1 | The PBMS, and the procedures and activities implemented to achieve the requirements of the PBCP Global Standard shall be included in the sites scheduled program of internal audits. The frequency that each activity is audited within the scheduled program shall be established in relation to the risks associated with the activity and previous audit performance; all activities shall be covered at least once each year. |

6 Supplier approval, purchasing, incoming ingredients and inputs and performance monitoring

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| **Clause** | **Requirements** |
| 6.1 | Procedures and/or policies related to purchasing of all ingredients and inputs shall be developed and implemented to ensure control and identification of ingredients and inputs containing materials of animal origin.  The site shall undertake a documented risk assessment of all ingredients and inputs, to identify potential materials of animal origin (including hidden sources of materials of animal origin). The risk assessment shall form the basis for acceptance of ingredients and inputs intended for use in plant-based products, as well as for any testing procedures and processes adopted for supplier approval and monitoring.  The risk assessment must be current and shall be updated:   * when there is a change in ingredients or inputs intended for use in plant-based products, processing of ingredients or inputs intended for use in plant-based products, or the supplier of ingredients or inputs intended for use in plant-based products * when a new risk of material of animal origin contamination emerges * when there is a product recall or withdrawal in which a specific ingredient or input intended for use in plant-based products is implicated. * at least every 3 years |
| 6.2 | The sites supplier approval procedure shall ensure that all suppliers and emergency suppliers of ingredients or inputs intended for plant-based products effectively manage material of animal origin contamination risks and are operating effective traceability processes. The approval procedure shall include, at a minimum:   * a valid certificate of recognition to show that the site conforms to the PBCP Global Standard. The ingredient or input intended for use in plant-based products must be listed on the supplier’s current Schedule A **or**   all of the following:   * a supplier questionnaire, with a scope that includes control of materials of animal origin, that has been reviewed and verified by a qualified individual or their designate * an allergen questionnaire that includes questions about allergen content and identifies the allergen status of each applicable ingredient or input * the supplier’s specification for each applicable input, ingredient, ingredient blend, and component of ingredient blends (as applicable), clearly listing each ingredient and, where applicable, components of ingredients. Specifications must be reviewed and agreed on by a demonstrably competent person. * documentation (e.g., letter of guarantee) indicating that the supplier shall: meet the site’s specifications; notify the site when a change is made to their applicable ingredient blend formula; and confirmation that such changes will not be made without prior approval from the site. |
| 6.3 | The sites supplier performance review procedures shall include criteria for evaluating suppliers of ingredients or inputs intended for plant-based products on their ongoing ability to provide ingredients that conform to the requirements of the PBCP Global Standard (e.g. free from material of animal origin). |
| 6.4 | The approved supplier list (or equivalent) shall include identification of suppliers of ingredients or inputs intended for plant-based products. The information shall be readily available to relevant staff (e.g., at goods receipt). |
| 6.5 | The site shall have a procedure for the acceptance of incoming ingredients or inputs intended for plant-based products and inputs on receipt, based upon the risk assessment, and must consider:   * sampling and testing * visual inspection on receipt * certificates of analysis for relevant testing from an accredited laboratory – specific to each consignment * any other means necessary to satisfy the risk assessment.   A list of incoming ingredients or inputs intended for plant-based products and inputs and the requirements to be met for acceptance shall be available. The parameters for acceptance and frequency of testing shall be clearly defined, implemented, and reviewed. |
| 6.6 | Procedures shall be in place to ensure that approved changes to ingredients or inputs intended for plant-based products and inputs, or of suppliers, are communicated to goods receipt personnel and ensure only the correct version of the plant-based ingredient and inputs is accepted (for example, when labels or printed packaging have been amended). Only the correct version shall be accepted and released into production. |
| 6.7 | * Co-manufacturers shall hold valid certificate of recognition to show that the site conforms to the PBCP Global Standard. The product co-manufactured must be listed on the supplier’s current Schedule A |

7 Suppliers of Services

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| 7.1 | The sites approval and monitoring process shall take into consideration potential risks to plant-based products (e.g. cross contamination).  Services that should be assessed shall include, as appropriate:   * pest control * laundry services * contracted cleaning * contracted servicing and maintenance of equipment * transport and distribution * off-site storage of ingredients, packaging or products * laboratory testing * catering services * waste management. |
| 7.2 | Contracts or formal agreements with the suppliers of services shall ensure potential risks to plant-based products associated with any services have been addressed. |

8 Specifications

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| **Clause** | **Requirements** |
| 8.1 | Specifications for ingredients and inputs intended for use in a plant-based product shall be adequate and accurate and shall demonstrate that the ingredient or input is free from ingredients of animal origin. |
| 8.2 | Accurate and up-to-date specifications shall be available for all plant-based finished  products and must demonstrate that the product is free from ingredients of animal origin.  These may either be in the form of a printed or electronic document or part of an online  specification system |
| 8.3 | Specification review shall be sufficiently frequent to ensure that data is current or at a  minimum every 3 years, taking into account product changes, suppliers, regulations and  other risks. |

9 Traceability

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| **Clause** | **Requirements** |
| 9.1 | At least annually, the site shall test the traceability system on a plant-based product toensure traceability  can be determined from the supplier of ingredients and inputs intended for use in plant-  based products to the finished product and vice versa, including quantity check/mass  balance. |

10 Complaint handling

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| **Clause** | **Requirements** |
| 10.1 | All complaints related to plant-based products shall be recorded. Substantiated complaints shall be investigated, and a root cause analysis performed. Results of that investigation shall be recorded. Preventative and corrective actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff. |

11 Product Recall and Withdrawal

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| **Clause** | **Requirements** |
| 11.1 | In the event of a recall or withdrawal related to a plant-based product, the site shall notify the certification body issuing the current certificate for the site against the PBCP Global Standard within 24 hours from the date of release of the official recall or withdrawal notice. |

12 Product development

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| **Clause** | **Requirements** |
| 12.1 | The site shall provide clear guidelines on the restriction of materials of animal origin in new plant-based product development. |
| 12.2 | All new plant-based products and changes to plant-based product formulation, packaging or methods of processing shall be formally approved by HAPPC team, and the PBCP qualified individual. This shall ensure that hazards have been assessed and suitable controls, identified through the HACCP system, are implemented. This approval shall be granted before products are introduced into the factory environment. |

13 Approval and control of labels

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| **Clause** | **Requirements** |
| 13.1 | Where applicable, procedures and/or policies shall be developed and implemented to ensure proper control of new or modified plant-based product labels. This must include a minimum of:   * a label approval process that includes steps to be followed in case of re-approval of product labels following modifications to existing product formulations * the documentation of the communication links between all the steps in the chain of production following approval of a new label or changes to a label * physical comparison of received labels to approved labels * confirmation that externally printed labels meet the specifications agreed on between the printer and the site. |
| 13.2 | Where applicable, procedures and/or policies concerning labels shall be developed and implemented to ensure that the labels of approved ingredients received match the site’s finished product list of ingredients and components of ingredients. |
| 13.3 | Where applicable, procedures related to labeling of finished product shall be developed and implemented to ensure that the finished product label information accurately represents the product name and the composition of the product on which the label is affixed.  Where the label information is the responsibility of a customer or a nominated third party the company shall provide:   * information to enable the label to be accurately created * updates whenever a change occurs that may affect the label information. |

14 Product authenticity, claims and chain of custody

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| 14.1 | 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 ingredients or inputs (ie fraudulent raw materials). Such information may, for example, come from:   * trade associations * government sources * private resource centers |
| 14.2 | A documented vulnerability assessment shall be carried out on all ingredients and inputs intended for use in plant-based products, or groups of ingredients and inputs intended for use in plant-based products, to assess the potential risk of adulteration or substitution with materials of animal origin. 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 ingredients and inputs intended for use in plant-based products through the supply chain  sophistication of routine testing to identify adulterants  nature of the ingredients and inputs.  The output from this assessment shall be a documented vulnerability assessment plan.  This plan shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risks. It shall be formally reviewed annually. |
| 14.3 | Where ingredients and/or inputs are identified as being at particular risk of adulteration or substitution, the vulnerability assessment plan shall include appropriate assurance and/or testing processes to mitigate the identified risk(s). |
| 14.4 | The status of each batch of the ingredient or input intended for use in plant-based product(s) shall be verified.  The facility shall maintain purchasing records, traceability of ingredient or input usage and final product packing records to substantiate the plant-based claim. The site shall undertake documented mass balance tests at least every 6 months in the absence of a scheme-specific requirement. |
| 14.5 | The process flow for the production of products where claims are made shall be documented and potential areas for contamination or loss of identity identified. Appropriate controls shall be established to ensure the integrity of the product claims. |

15 Marketing claims

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| **Clause** | **Requirements** |
| 15.1 | Any reference to the PBCP Global Standard and/or trademark(s), including statements on labels, advertising, marketing, and communication material (whether in print and digital/online or other media) must be:   * approved by BRC Global Standards or the trademark owner * in compliance with the PBCP Trademark Usage Guide and/or the requirements of the owner of the trademark or statement * in compliance with the legislation of the country where the product will be sold. |

16 Cross contamination control

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| **Clause** | **Requirements** |
| 16.1 | Where applicable, and based on risk, the procedures and/or policies shall be developed and implemented to control cross-contamination of material of animal origin into plant-based products. As a minimum, consideration shall be given to the following procedures:   * production scheduling if dedicated lines for plant-based products are not available * employee traffic patterns * traffic flow and handling during the receiving, storage, processing, and packaging * dedicated uniforms and personal protective equipment * dedicated or segregated storage * the identification and sanitation of bulk containers * dedicated utensils, equipment and areas * the handling and storage of rework product(s) * the use of equipment, tools, and utensils with sound sanitary design * the cleaning of equipment/product contact surfaces/areas during operations if dedicated lines/equipment/areas for plant-based production are not available * dedicated maintenance and engineering tools * appropriate airflow * the control and separation of ingredients that are used in both plant-based and non-plant-based formulas |

17 Control of recipes and formulations

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| **Clause** | **Requirements** |
| 17.1 | Procedures associated with weighing/blending/mixing/formulation shall be developed and implemented to ensure that the correct ingredient is added to the correct product as indicated in the formula. |
| 17.2 | Where applicable, procedures and/or policies related to the use of rework shall be developed and implemented to prevent the introduction of materials of animal origin into a plant-based product (e.g. control and labeling). |
| 17.3 | Procedures and/or policies shall be developed and implemented to ensure the correct identification and labelling of ingredients and work in progress. |

18 Segregation and disposal of obsolete and waste material

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| **Clause** | **Requirements** |
| 18.1 | Where applicable, the procedures and/or policies for the segregation and safe disposal of obsolete materials shall be developed and implemented to prevent their inadvertent use (e.g., PBCP trademark) or risk of cross-contamination. Obsolete materials include:   * labels (refers to any preprinted packaging that bears a list of ingredients) * ingredients and work in progress * finished products. |

19 Plant-based awareness training

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| **Clause** | **Requirements** |
| 19.1 | The sites documented training program must include plant-based awareness training.  All relevant personnel, including engineers/maintenance, temporary staff, and contractors, shall have received general plant-based awareness training and be trained in the site’s materials of animal origin handling procedures.  Training shall be conducted at an appropriate pre-determined frequency, at least annually, and must include, at a minimum, where appropriate:   * ingredients, components of ingredients, and processing aids that contain materials of animal origin * traffic patterns of people and equipment * dedicated plant-based production areas, equipment and tools * separation and segregation of product and processes * uniforms and personal protective equipment * job rotation practices * management of contractors, visitors, and temporary employees. |

PART III

CERTIFICATION PROCESS AND AUDIT PROTOCOL

**1 Application to BRC Global Standards**

**2 Program License Agreement (PLA)**

**3 Schedule A**

**4 Selection of an audit option through the certification body**

**5 Self-assessment of compliance with the PBCP Global Standard**

**6 Selection of a certification body**

**7 Scope of audit**

**8 Selection of auditor(s)**

**9 Duration of the audit**

**10 The on-site audit**

**11 Procedures for handling nonconformities and corrective actions**

**12 Audit reporting**

**13 Certification**

**14 Ongoing audit frequency and recertification**

**15 Certificate expiry extensions – justifiable circumstances**

**16 Audits undertaken prior to due dates**

**17 Suspension of a certified site**

**18 Withdrawal of certification**

This section details the process for the certification of sites and the licensing under the PBCP Global Standard. The program has been designed to accommodate any product from a site of any size.

The following provides an overview of the steps to gain certification:

1 Application to BRC Global Standards

All sites must complete the on-line application form prior to certification. This can be found on BRCGS website at www.brcgs.com

2 Program License Agreement (PLA)

Upon review of the application, BRC Global Standards will contact the applicant site to enter into a PLA. A separate agreement for fees, as determined by BRC Global Standards, may apply according to the number of products that appear on the Schedule A. Payment is due on an annual basis. The duration of the PLA can be one year or multi-year.

3 Schedule A

Sites must complete and submit a Schedule A and/or an equivalent approved BRC Global Standards process. The Schedule A and/or agreed equivalent BRC Global Standards process must capture all the plant-based products that will be recognized under the PBCP Global Standard and may require updating from time to time.

4 Selection of an audit option through the certification body

Audits must be scheduled for dates and times when plant-based production is scheduled. There are three options and processes available for sites to demonstrate their commitment to the PBCP Global Standard:

* **Standalone audit** The focus of a stand-alone audit is only on the PBCP Global Standard requirements.
* **Combined audit** The focus of a combined audit is on the PBCP Global Standard requirements in conjunction with any other third-party food safety management system audit.
* **Unannounced combined audit** In the case where a combined audit takes place, and the food safety system audit is unannounced, and there is no plant-based production at the time of the audit, the audit may still be conducted providing the auditor can walk through the process and understand controls that operate during plant-based production, and records from previous plant-based production runs are available. In this case, the next PBCP Global Standard audit must be conducted while plant-based production is taking place. This option (walk through) is not permitted if it is the first PBCP Global Standard audit.

5 Self-assessment of compliance with the PBCP Global Standard

The PBCP Global Standard should be read and understood, and a preliminary self-assessment should be conducted by the site against the PBCP Global Standard, using the PBCP self-assessment checklist. Any areas of identified nonconformity should be addressed by the site before ordering an audit. This can be done as part of an internal audit.

Sites that are newly built or “commissioned” must ensure that systems and procedures in place are compliant before an initial audit is undertaken. It is at the discretion of the site when they wish 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 3 months from commencement of operation.

6 Selection of a certification body

Audits against the PBCP Global Standard are only recognized if they are undertaken by approved certification bodies. A list of such bodies can be found on the PBCP website.

It is expected that a contract shall exist between the site and the certification body. The contract should contain clauses that allow the effective management of the PBCP Global Standard audit process.

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 programs
* witness audits by accreditation bodies
* witness audits by BRC Global Standards.

7 Scope of audit

The audit shall include all applicable requirements within the PBCP Global Standard and all plant-based production processes undertaken for the products listed on the site’s Schedule A.

The product scope category of the audit shall reflect the product scope category of the scheme (GFSI or START! Programme) with which the PBCP is being combined with. In the case of a stand-alone audit, the product scope category will be based on that of the scheme (GFSI or START! Programme) that the site is certificated to. The product scope category shall be agreed between the site and the certification body in advance of the audit to ensure the allocation of auditor(s) with the correct product knowledge.

8 Selection of auditor(s)

It is the responsibility of the site to ensure that adequate and accurate information is given to the certification body, detailing the products it manufactures and the process technologies it uses, so as to enable the certification body to select an appropriate audit team with the required skills to undertake the audit.

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

Where the audit is not being carried out by the auditor(s) in the native language of the site, an appropriate translator, who has knowledge of the technical terms used during the audit, shall be provided. The final audit report must be submitted to BRC Global Standards in English.

9 Duration of the audit

Before the audit takes place, the certification body shall indicate its approximate duration. The typical duration for a standalone is 1 day at the site. When a PBCP Global Standard audit is being combined with another food safety management audit, it will take approximately an extra 0.5 days.

10 The on-site audit

A typical on-site audit consists of the following stages:

* **Opening meeting** To confirm the scope and process of the audit.
* **Document review** A review of the documented PBMS.
* **Production site inspection** To review practical implementation of the systems, including observation of product changeover procedures and interviews with personnel.
* **Traceability challenge** Including a review of all relevant records of production (e.g., ingredients intake, production records, finished product checks, and specifications).
* **Label review** Including a review of a sample of plant-based product labels to check against specification and legislation.
* **Final review of findings by the auditor(s)** Preparation for the closing meeting.
* **Closing meeting** To review audit findings with the site. A draft of the nonconformity report will be left with the site (Note that nonconformities are subject to subsequent technical review by the certification body management).

The site shall fully assist the auditor(s) at all times. It is expected that at the opening and closing meetings those attending on behalf of the site will be members of the PBMS team.

The audit process gives emphasis to the practical implementation of the PBMS procedures and general good manufacturing practices. It is expected that the auditor will spend an appropriate amount of time auditing production, interviewing staff, observing processes, and reviewing documentation in production areas with the relevant staff.

During the audit, detailed notes shall be made regarding the site’s conformities and nonconformities against the PBCP Global Standard, and these will be used as the basis for the audit report. The auditor(s) shall document all nonconformities and discuss them with the attending PBMS team representative at the time.

At the closing meeting, the auditor(s) shall present their findings and reconfirm all nonconformities that have been identified during the audit. Information on the process, and timescales for the site to provide evidence to the auditor(s) of the corrective action to close nonconformities, must be given. A draft summary of the nonconformities discussed at the closing meeting will be left with the PBMS team.

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 nonconformities in the appropriate timeframe. The site will be informed of the certification decision following this review.

11 Procedures for handling nonconformities and corrective actions

Following identification of any nonconformities during the audit, the site must undertake corrective action to remedy the immediate issue(s) (correction) together with an analysis of the underlying cause of each nonconformity, which can then be used in preventative action. The action plan produced should include timelines and be provided to the certification body. Close-out of nonconformities can be achieved either by objective evidence being submitted to the auditor (either at the time of the audit or subsequent to it), which may include updated procedures, records, photographs or invoices for work undertaken, or by the auditor undertaking a further on-site visit, as appropriate.

If satisfactory evidence is not provided within the 28-calendar day period allowed for submission following the audit, certification will not be granted. The site may be required to have a further full audit in order to be considered for certification. No certificate shall be issued until the site can demonstrate that all nonconformities have been addressed. Nonconformities from the audit shall be checked during the next audit to verify effective close-out.

The certification body will conduct a technical review of both the evidence and any corrective action(s) being completed prior to awarding a certificate.

In some circumstances the number or severity of nonconformities raised at the audit prevents the site from being certified following that audit. This will be the case where a critical nonconformity is raised.

Nonconformities 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 site will be required to undertake another full audit before an assessment for certification can take place.

Occasionally, the nature and number of nonconformities make it unlikely that they can be addressed, and fully effective improvements implemented and established, within a 28-day period. Therefore, the re-audit shall not take place any earlier than 28 days from the audit date.

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

It is a requirement of some customers that they shall be informed when their suppliers have a critical nonconformity identified or fail to gain certification. In such circumstances the company shall immediately inform its customers and make them fully aware of the circumstances.

12 Audit reporting

Following each audit, a full written report shall be prepared in the agreed format. The final report shall be produced in English.

The audit report shall be provided to the site in a timely manner. The report shall accurately reflect the findings of the auditor during the audit. Reports shall be prepared and issued to the site within 42 calendar days from the first day of the audit, with a copy being sent to BRC Global Standards.

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

13 Certification

After a review of the audit report and documentary evidence provided in relation to the nonconformities identified, a certification decision shall be made by the designated technical reviewer. The certificate of recognition, if granted, shall be issued by the certification body within 42 calendar days from the first day of the audit. It shall include the required information found in Appendix 5. Trademarks owned or managed by BRC Global Standards that are used on certificates of recognition shall comply with the PBCP brand standards.

While the certificate of recognition is issued to the site, it remains the property of the certification body, and that body controls its ownership, use, and display. The certification body shall inform BRC Global Standards of its issuance and provide a copy.

All sites that achieve a certificate of recognition shall be entered into the list of certified sites.

All fees relating directly to the site must be paid in full to BRC Global Standards prior to issuance of the certificate of recognition. Neither certification, nor the audit report, shall be valid until all fees have been received, irrespective of the outcome of the certification process.

14 Audit frequency and recertification

The frequency of announced audits will be 12 months. The due date of the subsequent audit shall be calculated from the date of the initial audit.

The subsequent announced 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.

Certificate expiry dates will be calculated from the first day of the audit plus 75 days.

Where combined with a GFSI audit, the re-audit due date shall conform to the protocol of the relevant GFSI scheme.

15 Certificate expiry extensions – justifiable circumstances

There will be some circumstances where the certificate of recognition cannot be renewed on the 12-month basis due to the inability of the certification body to conduct an audit. These justifiable circumstances can include when the site 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
* within a statutory exclusion zone that could compromise food safety or animal welfare
* in an area that has suffered a natural or unnatural disaster, rendering the site unable to produce or the auditor unable to visit
* affected by conditions that prevent access to the site or restrict travel (e.g., inclement weather)
* producing seasonal products where production is delayed by a late start to the seasons (e.g., due to weather or product availability).

It is expected that the audit will be scheduled to ensure the availability of personnel and full production of plant-based products. Deviations from this may be considered by BRC Global Standards on a case by case basis.

16 Audits undertaken prior to due dates

In some circumstances it is possible to undertake the audit earlier than these due dates, for example to reset the audit dates to allow combined audits with another food safety system audit. These are allowed on a case by case basis.

17 Suspension of a certified site

A site’s certificate of recognition may be suspended if:

* the certified site does not comply with the requirements of the PBCP Global Standard and any other act or regulation that may impact on the plant-based products being sold; or
* the operator fails to comply with the requirements of the PBCP Global Standard, the PBMS, and any other act or regulation that may impact on the plant-based products being sold; or
* BRC Global Standards and the certification body believe that public health will be endangered or the reputation of BRC Global Standards, as well as the plant-based status of products produced in the certified site, will be affected if the site is allowed to continue operating as a certified site; or
* the site is subject to a receivership or makes an assignment in bankruptcy.

If a certified site is in jeopardy of suspension, it will be notified of the existence of grounds for suspension and given evidence of any deviation from the requirements of the PBCP Global Standard. The certification body will specify corrective measures and dates for completion. If the site has failed or is unable to take corrective measures by the specified date, a notice of suspension will be delivered to the site.

The suspension of a site’s certification shall remain in effect until the required corrective measures have been taken and verified as completed to the satisfaction of the certification body or BRC Global Standards.

If an operator fails to pay any fee specified by BRC Global Standards in accordance with the conditions of payment prescribed by it, the certification of a site to the PBCP Global Standard shall also be suspended until all outstanding fees are paid.

Note: BRC Global Standards reserves the right to inform the brand owner (if different from the site) if certification is suspended. In the event of suspension of certification, the site must cease use of all associated logos and/or trademarks as per the site’s PLA.

18 Withdrawal of certification

The certification body or BRC Global Standards reserves the right to withdraw the certification of a site if:

* the site has not implemented the required corrective measures within an agreed timeframe; or
* the site has provided false or misleading information; or
* the site gives up certification by voluntarily withdrawing from the BRC Global Standards’ Plant-Based Certification Program.

Note: BRC Global Standards reserves the right to inform the brand owner (if different from the site) if certification is withdrawn. In the event of withdrawal of certification, the site must cease use of all associated logos and/or trademarks as per the site’s PLA.

PART IV

MANAGEMENT AND GOVERNANCE OF THE PBCP GLOBAL STANDARD

Requirements for certification bodies

Governance and administration of the PBCP Global Standard

Achieving consistency – compliance

Calibrating auditors

Feedback

PART IV

MANAGEMENT AND GOVERNANCE

Requirements for certification bodies

The PBCP Global Standard is a management system certification standard. In this standard, sites are certified upon completion of a satisfactory audit by an approved 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, under ISO/IEC 17065 to perform food safety audits or specifically PBCP Global Standard audit services.

BRC Global Standards recognizes that in certain circumstances, such as for new certification bodies wishing to commence auditing against the PBCP Global Standard, adding the PBCP Global Standard to their ISO 17065 scope may not yet have been achieved. This is because this accreditation process 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 process of achieving accreditation, and so some unaccredited PBCP Global Standard audits under ISO 17065 will be performed. This will be permitted where the organization can demonstrate the following:

* current ISO/IEC 17065 accreditation for a GFSI or equivalent food safety scheme
* an active application, with an approved national accreditation body, to extend their ISO/IEC 17065 accreditation scope to include the PBCP Global Standard
* that accreditation for the PBCP Global Standard will be achieved within 24 months of the date of application and the experience and qualifications of the auditors are consistent with those specified by BRC Global Standards
* a license is in place with BRC Global Standards and all other license requirements have been met.

Governance and administration of the PBCP Global Standard

Achieving consistency – compliance

The maintenance of a high and consistent standard of audit and certification, as well as the ability of the certified sites to maintain the standards achieved at the audit, are essential to confidence in the scheme and to the value of certification. BRC Global Standards therefore has an active compliance program to provide oversight of the work of accreditation bodies and ensure that high standards are maintained.

Sites may only be certified to the PBCP Global Standard by certification bodies licensed and approved by BRC Global Standards and accredited by an accreditation body recognized by the same. All auditors undertaking audits against the PBCP Global Standard must meet the auditor competency requirements and be approved by BRC Global Standards. The qualifications, training, and experience requirements for auditors who conduct audits against the PBCP Global Standard are comprehensive (see Appendix 3). All audits undertaken against the PBCP Global Standard shall be submitted to BRC Global Standards.

BRC Global Standards operates a compliance monitoring program that reviews the performance of the certification bodies, samples the quality of audit reports, assesses levels of understanding of the scheme requirements and investigates any issues or complaints. As part of this program, feedback on the performance is provided to each certification body through a key performance indicator (KPI) program.

As part of the compliance program, BRC Global Standards may audit the offices of certification bodies and accompany auditors on audits at sites to observe their performance.

Calibrating auditors

A key component of the PBCP Global Standard is the calibration of the 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 this training and calibration is the witnessed audit program, which involves auditors being observed during an audit and provided with feedback on their performance. In order to ensure consistency between certification bodies, and for the purposes of accreditation, an audit may be witnessed by a representative from BRC Global Standards or an accreditation body auditor. Guidelines apply to these activities to ensure that sites are not disadvantaged by the presence of two auditors. This process forms an essential part of the scheme and sites are obliged to permit witnessed audits as part of the conditions for certification. Auditors will be required to participate in training activities delivered through the certification body or BRC Global Standards as part of refresher training as and when required.

Feedback

Sites being audited against the PBCP Global Standard may wish to provide feedback to the certification body or BRC Global Standards on the performance of the auditor. Such feedback, when and if sent to BRC Global Standards, will be considered in confidence. Feedback provides a valuable input to the BRC Global Standards’ monitoring program for certification body performance. All audited sites are invited to provide feedback to tellus@brcglobalstandards.com at any time.

Use of the trademarks

Certified sites that intend to use the PBCP owned or managed trademarks must meet all requirements outlined in the PBCP Trademark Usage Guide.

APPENDICES

Appendix 1 Qualifications, training and experience requirements for auditors

Appendix 2 Certificate Template

Appendix 3 List of prohibited inputs

Appendix 4 Glossary

Appendix 5 Abbreviations

Appendix 6 Acknowledgements

APPENDICES

Appendix 1  
Qualifications, training, and experience requirements for auditors

The certification body is responsible for ensuring that auditors acting for BRC Global Standards meet, and can provide evidence of meeting, the following mandatory prerequisites and requirements:

* Provides an auditor profile and shows a proven track record for auditing food safety and quality management systems within the food or other industries as appropriate. This shall include:
* a degree in food science, related major, or equivalent experience and training
* 5+ years of experience in auditing food safety management systems within the industry
* Has completed a training course in HACCP (as evidenced by examination), based on the principles of Codex Alimentarius, of at least 2 days’ duration, and is able to demonstrate competence in the understanding and application of HACCP principles. It is essential that the HACCP course is recognized by the industry (and its stakeholders) as being appropriate and relevant
* Has a recognized lead auditor certificate in good standing
* Participated and passed PBCP Global Standard Auditor Training course and examination
* Participated in any refresher training and passed any associated examination as set and required under the PBCP Global Standard and achieved an auditor certificate approved by BRC Global Standards
* Works under the authority of an approved BRC Global Standards certification body.

The approved auditor will be involved in:

* assisting clients with questions relevant to the PBCP Global Standard audit and/or recognition process
* reviewing a site’s plant-based management system documentation and previous audit reports
* conducting on-site audits to verify and document evidence of conformity to the PBCP Global Standard
* writing comprehensive reports on the audit findings
* participating in opening and closing audit meetings and possibly conducting presentations of findings to the client
* providing clarification of any recommended corrective action requirements
* providing the approved certification body and administration team with audit reports, updates on status of work, nonconformance closures and any other projects as required
* assisting the administration team in addressing any appeals relative to the audit process or results
* where required by the certification body, completing technical reviewer tasks.

Ongoing requirements:

* refresher training once per year or as it becomes available
* retraining with each PBCP Global Standard revision
* completion of a minimum of 5 GFSI audits per year.

Appendix 2  
Certificate Template

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

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

[Insert artwork]

Appendix 3  
List of prohibited ingredients and inputs

Animal-Derived Additives

E120 Cochineal

E542 Edible Bone Phosphate

E631 Sodium 5-Inosinate

E901 Beeswax

E904 Shellac

Calcium Mesoinositol Hexaphosphate

Lactose

Sperm Oil

Sermaceti

Animal Fibres

Animal Milks & Animal Milk Derivatives

Casein

Caseinates

Lactates

Lactic Acid

Lactose

Bee Products

Bee Pollen

Bee Venom

Beeswax

Honey

Propolis

Royal Jelly

Dairy Products & By-Products

Butter

Cheese

Whey

Yogurt

Eggs

Duck

Hen

Quail

Ostrich

Human-Derived Substances

Keratin

Placenta

Items Direct from the Slaughter of Animals

Fish

Game & Derivatives

Meat

Poultry

Marine Animal Products

Ambergris

Capiz

Caviar(e)

Chitin

Coral

Fish Scales

Fishmeal

Isinglass

Marine Oils & Extracts (Fish Oils, Shark Oil (Squalene or Squalane) Seal Oil, Whale Oil)

Pearl Roe

Seal Meat

Shellfish

Sperm Oil

Spermaceti Wax

Whale Meat

Slaughter By-Products

Animal Fats (Dripping, Lard, Suet, Tallow)

Amino Acids

Aspic

Bone

Bone Charcoal

Bone-Meal

Collagen

Dried Blood

Fatty Acid Derivatives

Gelatin(e)

Glycerin(e)/Glycerol

Hoof & Horn Meal

Oleic Acid and/or Oil

Oleostearin

Pepsin

Protein (Elastin, Keratin, Reticulin)

Rennet

Skins

Stearates

Stearic Acid

Stearine

Other

Amniotic Fluids

Carmine/Carminic Acid

Catgut

Chamois

Cochineal

Crushed Snails and/or Insects

Fixatives (Musk, Civet, Castoreum)

Hormones (Oestrogen, Progesterone, Testosterone)

Ivory

Lanolin(e)

Oil of Mink

Parchment

Processing Aids and/or Release Agents of Animal Origin

Silk

Shellac

Snake Venom

Some Vitamins (D3)

Urea

Vellum

Appendix 4

Glossary

|  |  |
| --- | --- |
| accreditation | an independent competence assessment of a certification body, performed by an accreditation body and whereby the management system assessed is based upon globally accepted international standards. |
| advertise | includes the making of a representation by any means for the purpose of promoting, directly or indirectly, the sale or disposal of a plant-based product. |
| allergen | as related to food, is any normally harmless substance that causes an immediate allergic reaction in a susceptible person. Food allergens are almost always proteins although other food constituents, such as certain additives, are known to have allergenic (allergy-causing) properties. |
| application | the first step (performed on-line) for a new brand-owner and manufacturer wishing to acquire recognition under the PBCP Global Standard. |
| approved auditor | a person who has met the criteria of BRC Global Standards and is approved to be an authorized auditor for the PBCP Global Standard. |
| audit | includes:   * in respect of a process, the verification or monitoring of the process, and * the examination of the other information that may be necessary to verify conformance with the requirements of the PBCP Global Standard. |
| certificate of recognition | the official recognition given to a site that conforms to the PBCP Global Standard. |
| certification body | a licensed entity which is authorized by BRC Global Standards to provide and manage auditing services. |
| certified | the recognition given to a site its overall PBMS have been assessed as conforming to the PBCP Global Standard requirements. |
| component | an individual unit of a substance that is combined with one or more other individual units to form an ingredient |
| critical control point | a point in a process at which control must be applied in order to prevent or eliminate a hazard or reduce a hazard to an acceptable level. |
| critical limit | minimum or maximum value to which a hazard must be controlled at a critical control point or equivalent to prevent or eliminate the hazard or reduce it to an acceptable level as may be determined by the national, regulatory competent authority. |
| food | has the same meaning as defined by the national, regulatory competent authority where the product is sold. |
| food additive | has the same meaning defined by the national, regulatory competent authority where the product is sold. |
| HACCP | Hazard Analysis and Critical Control Point, is a science-based risk management system with the objective of identifying and preventing, reducing or eliminating food safety hazards. |
| hazard | a biological, chemical or physical agent or factor that has the potential to cause a product to be unsafe for human consumption or a failure to conform to the PBCP Global Standard in the absence of its control. |
| ingredient | an individual unit of product that is combined with one or more other individual units of a product to form a final or finished product. |
| input | a material which is not an ingredient but is required to complete the manufacture of the product (e.g., processing aids, packaging, cleaning materials) and may contribute to contamination of the product by material of animal origin. |
| internal audit | a conformity assessment conducted by the site as a requirement of the PBMS. |
| label | any tag, brand, mark, pictorial or other descriptive matter, written, printed, stenciled, marked, embossed or impressed on, or attached to, a container of food. |
| list of certified sites | the list of companies deemed to be in conformance with the PBCP Global Standard which is maintained by BRC Global Standards. |
| material of animal origin | any ingredient, component of an ingredient or processing aid which is derived from or produced by an animal. |
| prerequisite programs | written programs developed for a recognized site as applicable in accordance with BRC Global Standards to ensure compliance with the PBCP Global Standard. Such programs relate to:   * the premises, including its outside property, buildings, and sanitary facilities * the quality of the water, ice, and steam * the storage and transportation of products, including temperature control and the vehicles for transporting products * the storage of material (e.g., incoming material, non-food chemicals, and finished products), including temperature control * the equipment, including its general design, installation, maintenance, and calibration * the training, hygiene, and health of personnel * sanitation and pest control * recall procedures and distribution records. |
| Program License Agreement (PLA) | the official authorization to use and apply the PBCP Global Standard trademark(s) or similar words. |
| Plant-Based Management System (PBMS) | a framework of policies, processes and procedures used by a site to ensure that it can fulfill all the tasks required to achieve the production of plant-based food products that comply with the PBCP Global Standard |
| Plant-based product | products that do not intentionally contain materials of animal origin, and have not intentionally used ingredients (including additives, carriers, flavorings and enzymes), processing aids, or any other substances that are of animal origin, at any stage during production and processing. |
| processing aid | a substance that is used for a technical effect during food processing or manufacture but, unlike food additives, its use does not affect the intrinsic characteristics of the food and it results in no or negligible residues of the substance or its by-products in or on the finished food. |
| Qualified Individual | An individual who has an in-depth knowledge of HACCP Codex principles (or equivalent) and has successfully completed the PBCP Global Standard Site Training Course. |
| Schedule A | a control and tracking document, listing all plant-based products produced at a site and which are intended to display any of the PBCP Global Standard permitted trademarks. |
| validation | the process of obtaining evidence that a control measure, if properly implemented, is capable of controlling a particular hazard to the specified level (in accordance with the Codex Alimentarius) |
| verification | the application of methods, procedures, tests, and evaluations to determine whether a control measure is or has been operating as intended (in accordance with the Codex Alimentarius) |

Appendix 5

Abbreviations

|  |  |
| --- | --- |
| PBCP | Plant-Based Certification Program |
| PBMS | Plant-Based Management System |
| GFSI | Global Food Safety Initiative |
| HACCP | Hazard Analysis and Critical Control Point |
| ISO | International Organization for Standardization |
| KPI | Key Performance Indicator |
| PLA | Program License Agreement |

Appendix 6

Acknowledgements

1. BRC Global Standards is a trading name of BRC Trading Ltd. [↑](#footnote-ref-2)