



Compliance  
creates  
confidence

Report 2020



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# Contents

## 04 Executive Summary

## 07 Global Audit Distribution



## 08 Our Certification Body Partners

- 09 Certification Body Approval Procedure
- 10 Certification Body Key Performance Indicators
- 11 BRCGS Schemes Offered by Certification Bodies
- 11 Certification Body Star Ratings
- 12 Auditing Our Partners

## 13 Our Auditors

## 16 BRCGS Compliance Auditing Programme - Site visits

## 18 BRCGS Insight

## 19 Product Recalls



## 20 BRCGS Product Portfolio

## 22 Stakeholder Feedback

## 23 Tell BRCGS Feedback, Complaints and Comments



# Executive Summary

In 2019, our key focus was continued investment to maintain our international reputation as the market leader in brand protection. This included the launch of our new BRCGS branding.

We now have over 29,000 certificated sites, making BRCGS the world's largest certification scheme. Maintaining consistency across the network, of course, presents a wide range of challenges. However, we have the benefit of a strong foundation based on over 12 years' experience. On top of that, we have worked very closely with our Certification Body delivery partners for many years.

Compliance lies at the heart of all BRCGS activity. The management of our systems is continually evolving to ensure brand protection by anticipating changes, for example by keeping ahead of pace of evolving requirements of external stakeholders such as GFSI and accreditation.

Our aim is always to deliver uniform compliance throughout the organisation. Therefore, our compliance programme tackles issues using a comprehensive and stringent range of initiatives which, together, form our quality assurance process. Importantly, they drive continuous improvement to ensure you can always have confidence in the value of BRCGS site certification.

# Achieving Excellence Through our Comprehensive Compliance Activity Programme



Robust approval system for Certification Bodies

We work with external stakeholders, such as GFSI and international Accreditation Bodies, to provide oversight to our management processes

KPI-based performance reviews of Certification Bodies every six months, resulting in publicly available star ratings on the **BRCGS Directory**

Office audit programme of our Certification Bodies delivery partners and their global partner offices

Comprehensive requirements for registered auditors

Independent BRCGS compliance audits:  
- visits to certificated sites  
- witness audits

Formal sanctions processes, including suspension and withdrawal of approval for Certification Bodies and auditors

Stakeholder feedback processes to gain your perspective on how well we are doing



“Activities driven primarily by a combination of stakeholder feedback and analysis of our vast quantity of audit data.”

We are committed to reducing risk and we employ a consistent risk-based approach to planning all our compliance activities. This is driven primarily by a combination of stakeholder feedback and analysis of our vast quantity of audit data, built up over the years, using the evolving sophistication of our databases.

We continue to undertake one-day visits to certificated sites to gain an insight primarily into how our scheme is being delivered by our Certification Bodies, as well as emphasising our continued expectations to sites. Increasingly, these visits are unannounced. Our findings drive improvements across the BRCGS business, including development of our support systems such as training and our BRCGS Professional learning programme.

This year, our work has been focused around auditor competence. Specifically, we have focused on helping Certification Bodies develop their auditors’ soft skills and management analysis of auditor performance to ensure calibration across interpretation and reporting on BRCGS requirements. This helps ensure we continue to have the best and highest calibre auditors.

“We have widened our portfolio of global products with the launch of two new Standards: Ethical Trade and Responsible Sourcing and the Gluten-Free Certification Program.”

In 2019, catering to the changing needs of the food and manufacturing industries, we have widened our portfolio of global products with the launch of two new Standards: Ethical Trade and Responsible Sourcing, and the Gluten-Free Certification Program. We also completed our Plant-Based Global Standard for launch in early 2020. We have therefore welcomed a number of new Certification Bodies to the BRCGS family, with expertise and experience in these specific areas to help us grow.

Our independent team of international compliance auditors also continues to grow to cater for our expansion. Our tight-knit team has been built up over the years and we are very happy that compliance auditors with exceptional skill, experience and reputation choose to work with BRCGS. The team rarely has the opportunity to gather together, so it was all smiles when the European and Asia-Pacific auditors met at our annual European Delivery Partners conference.

“Our aim is to create more secure supply chains worldwide, while embedding integrity and high standards throughout the retail and manufacturing industries.”

This report is driven by our commitment to promote a culture of transparency, communication and feedback. Our aim is to create more secure supply chains worldwide, while embedding integrity and high standards throughout the retail and manufacturing industries. I hope you find our report interesting and useful.



**KAREN BETTS**  
Head of Compliance  
BRCGS

# Global Audit Distribution

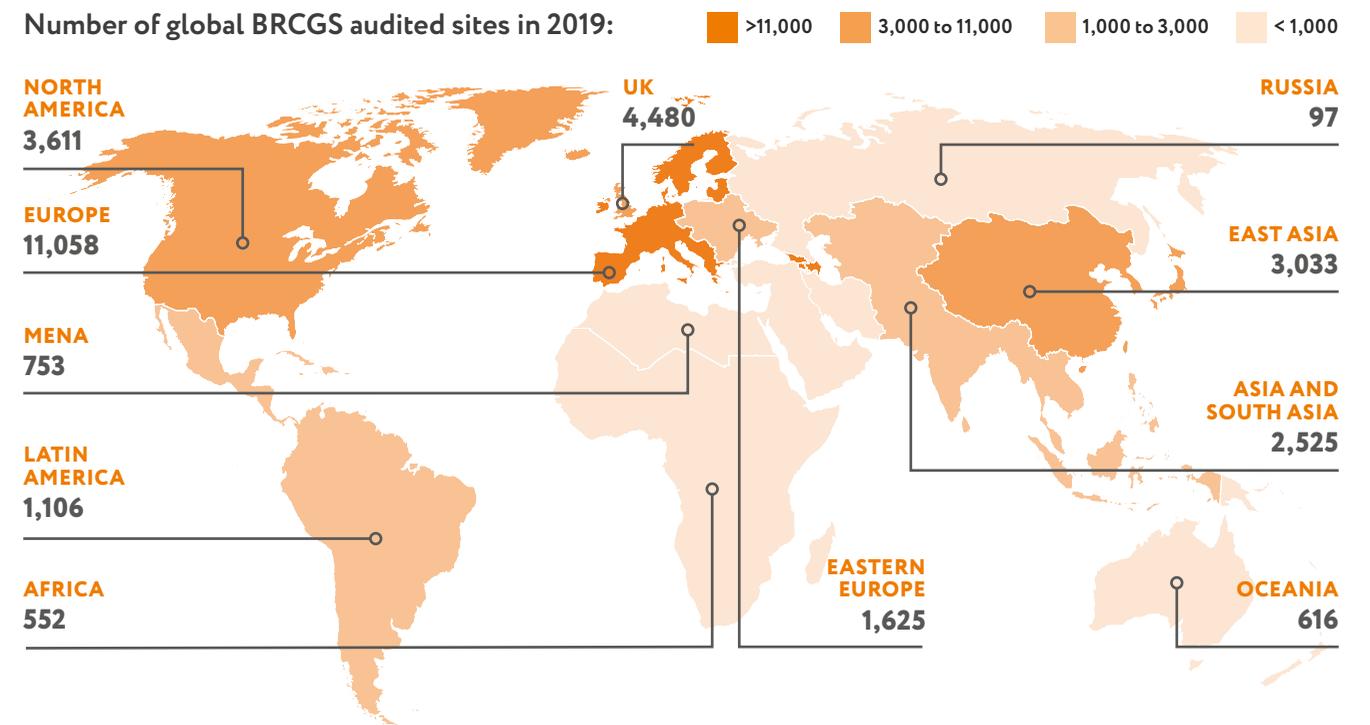
We continue to carry out more audits every year: in 2019, the total number of BRCGS audits across the world was over 29,000, an annual growth of 2%. The number of auditors working across the globe also grew by 2%.

Although our flagship **Food Safety** scheme has been running for over 20 years, it continues to grow rapidly, particularly in China, India, Italy, Poland and the US. Our **Packaging Materials Standard** grew in a similar way and we are seeing accelerated growth with our **Agents and Brokers** scheme,

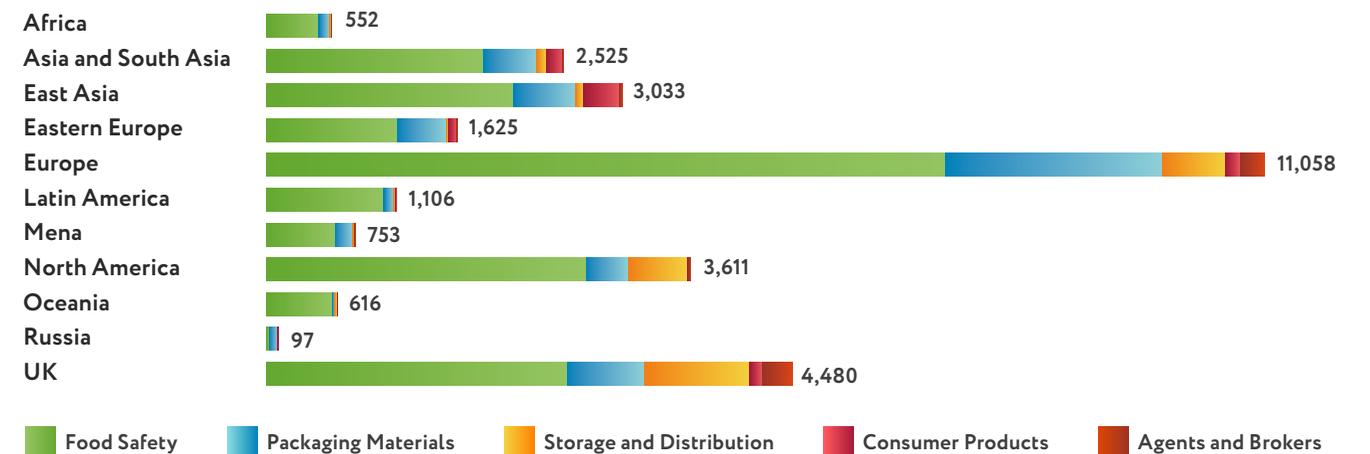
which has now reached its fifth birthday. The changing demographics have been reflected in our allocation of resources – we have commercial representatives in these growth regions including India, Italy, China and Poland to support the growing customer numbers.

In addition, the Compliance team has extended the competence of our auditors through additional training to ensure appropriate cover for all schemes and countries.

Number of global BRCGS audited sites in 2019:



Number of global BRCGS audits by Standard in 2019:



# Our Certification Body Partners

We work with the best partners across the globe to deliver the best results and most of our Certification Bodies have been working with us for over 10 years.

However, in 2019 we welcomed several new delivery partners. This reflects the changing needs of our evolving product portfolio and changes in demographics affecting how certification businesses operate around the world.

We remain the world's largest third-party certification scheme and we are confident we can offer you the best results. We have the resources to offer audits from our Standard portfolio anywhere in the world, without compromising on the high quality we require from our partners.

BRCGS' global reach is based on our close relationships with 74 Certification Bodies. We train them on our procedures and provide ongoing monitoring to ensure consistency. The result is that they all understand and follow the BRCGS Standards and their associated modules.

All Certification Bodies attend our annual conference, either in Europe or the US. This is supplemented by our regular technical bulletins and certification body meetings across the world.

**“BRCGS' global reach is based on our close relationships with 74 Certification Bodies. We train them on our procedures and provide ongoing monitoring to ensure consistency.”**

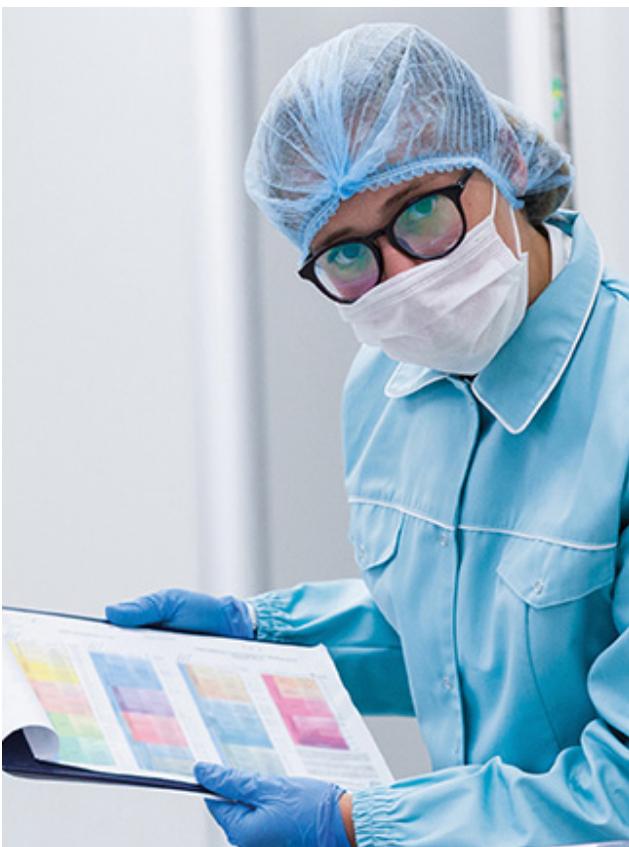


## APPROVAL OF CERTIFICATION BODIES

**Certification Bodies are the ambassadors of BRCGS auditing and are crucial to ensuring the standards are maintained and consumers are protected.**

Our controls ensure a transparent legal framework exists which is traceable directly from the audited client to the certifying body, identifying subcontracted processes that may be provided by local partners. Annual audits of international Certification Bodies' local partners ensure there is robust management and correct understanding of BRCGS' expectations across the complete audit supply chain.

BRCGS always welcomes new Certification Bodies with expertise in our new Standards: Ethical Trade and Responsible Sourcing, Gluten-Free and Plant-Based.



# Certification Body Approval Procedure

- 1 Complete BRC008 registration form with nominated accreditation body details. Return to [enquiries@brcgs.com](mailto:enquiries@brcgs.com)
- 2 Comprehensive business plan submitted by Certification Body outlining provision of auditor resource, experience and five year growth plan
- 3 Legal and Operational agreement BRC004 signed, including evidence of £5 million insurance
- 4 Application fee paid on acceptance of application
- 5 Certification Body to add details of fully qualified auditors onto the BRCGS Directory for validation
- 6 Once auditor registration is approved by BRCGS, the Certification Body details will be added to the **BRCGS Directory** and auditing against the registered BRCGS Standard(s) can begin
- 7 Certification Body must have met all of the criteria specified in BRC016 within 12 months

# Certification Body Key Performance Indicators

BRCGS monitors Certification Bodies through five KPIs, to ensure we only work with the best-performing, most compliance-orientated partners. We use sophisticated data analytics to gather and analyse data to better understand the results, driving continuous improvement.

Every six months, the Compliance team monitors the Certification Bodies' performance and rates them from one to five stars against the KPIs.

## AUDITOR REPORT QUALITY

BRCGS has a structured requirement in place for audit reporting to check they are accurate and descriptive. Reports should provide enough information to understand the layout, fabrication and controls in place at a site with clear certification scope. The first stage is checking a carefully selected representative sample of reports. We also carry out a number of compliance visits to sites to check the veracity of the reports against reality.

## PROTOCOL

We use our data management tools, BRCGS Directory and Insight, to interrogate the trends of every audit to ensure they meet all audit protocols and guidelines, such as the correct audit duration, correct grading and that non-conformities are correctly completed.

## COMMUNICATION

Effective communication is a key to success. We monitor the communication channels between our delivery partners on issues such as product recalls and complaints investigation to ensure this is effective and on-time.

## RESULT SUBMISSION

Timeliness and accuracy of audit outcomes is a key stakeholder concern. This is continually monitored to ensure stakeholders have access to accurate and timely results through the publicly-available records on the **BRCGS Directory**.

## AUDITOR MANAGEMENT

We monitor each of the 1,840 auditors employed by our Certification Body partners to verify they are fully qualified and trained regularly to ensure they perform consistently high quality audits with high skill and they are kept up to date with emerging industry issues. Auditor skill is the main focus of our compliance visits and witness audits.

KPI Criteria



# BRCGS Schemes Offered by Certification Bodies

The breakdown of the 74 Certification Bodies offering BRCGS schemes is:



# Certification Body Star Ratings

The star ratings are based on the performance of the Certifications Bodies' head office management of the BRCGS certification scheme, not individual auditors or audits.

# 94%

of our Certifications Bodies have either a four or five-star rating

- In the past two years, our rigorous KPI process has ensured 94% of our Certification Bodies have either a four or five-star rating. We maintain transparency by posting the results on the **BRCGS Directory**.

KPI period / year	Total CBs	0 stars	1 star	2 stars	3 stars	4 stars	5 stars
KPI 19 Oct 18 - Mar 19	67	0	0	1	3	19	44
KPI 18 Apr 18 to Sept 18	67	0	0	0	4	22	41
KPI 17 Oct 17 - Mar 18	66	0	0	1	7	24	34

# Auditing Our Partners

We are committed to continually improving and supporting our partners' work. To do that, we work closely with Certification Bodies, carrying out head office audits for new partners and for partners who are operating below the star rating standards we expect.

In 2019, the Compliance team conducted head office audits in Greece, the Netherlands, New Zealand, and the UK. We also conducted global partner office audits in Turkey to understand this growing market and see where we can support our delivery partners.



## SANCTIONS

**BRCGS works very closely with our certification partners to ensure they understand and follow our auditor protocol and KPI criteria.**

As well as monitoring Certification Bodies every six months, when a Certification Body drops below three stars we put in place additional management oversight such as undertaking office audits and increased site visits to ensure our scheme is robust and consumers are not put at risk. Our aim is also to help them review their systems to improve their rating and get back on track.

We suspend Certification Bodies that receive two stars, meaning they can no longer offer BRCGS certification because we need to ensure brand reputation and integrity of the Standards is not comprised. This year, one Certification Body was suspended, and another was issued with a formal warning. Both were expected to submit a comprehensive corrective action plan, which we monitored closely.

This is typically a highly effective process. One Certification Body, suspended at the end of 2017, now has a four-star rating. This is the result of a comprehensive corrective action plan which included a thorough audit and the phased lifting of the suspension across different geographies of clients.



## AUDITOR COMPETENCY

**This is always a hot topic and in 2019 we focused on what makes a good auditor, how we can ensure consistency across auditors and how we can help Certification Bodies calibrate auditors and keep them up to date with emerging industry issues.**

With information on 1,840 auditors and over 29,000 annual audits, BRCGS has a wealth of data, built up over the last 10 years, that can be easily analysed in a number of ways through BRCGS Insight. This data is available to all Certification Bodies. Dashboards available allow Certification Bodies to conduct in-depth management reporting, allowing benchmarking across auditors, countries and industries identifying risks and auditing inconsistencies that warrant further investigation. The aim is to enhance audit consistency.



# Our Auditors

We have some of the best auditors in the world, ensuring our protocols are consistently maintained and are instrumental in embedding safety throughout the supply chain. We have rigorous auditor requirements both for initial approval and continual registration.

**All our auditors are experienced professionals with:**

- formal qualifications in auditing
- formal qualification in Hazard Analysis (HACCP)
- the right experience of the product and its associated technologies

**They have also all completed BRCGS mandatory training courses, including the GFSI knowledge exam.**

A visit from a compliance auditor may not be expected but generally any initial concern about the reason for the visit is often overcome by the experience of the visit.

For example, we recently received feedback about one of the visits undertaken by our BRCGS compliance auditor, Rich Simmons.

“It was a pleasure getting to host you. You are welcome to our facility at any time. The team and I truly appreciate the great feedback that was given. You cleared up a lot of questions we had. Thanks again and safe travels.”



Rich Simmons is a BRCGS Compliance auditor with over 38 years of experience within the food industry. Rich, well known in the industry,

became the first BRCGS auditor in Canada. He has been auditing in the food industry for over 16 years and is well acquainted with Certification Body management, having worked at a number of Certification Bodies. He has many years of experience working with auditors as well as being a BRCGS Approved Training Partner.

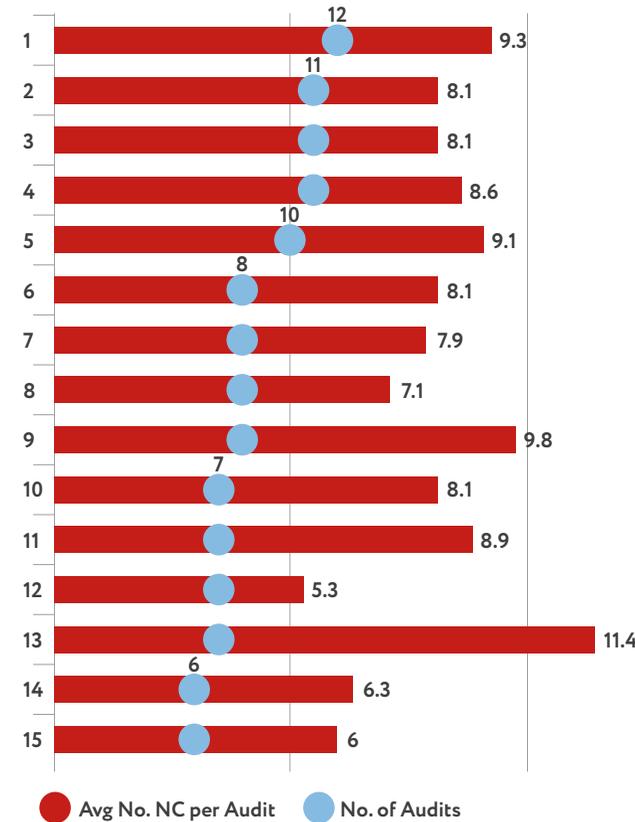
1,840  
auditors  
over  
29,000  
annual audits

**NUMBER OF AUDITORS REGISTERED IN THE FOLLOWING SCHEMES:**

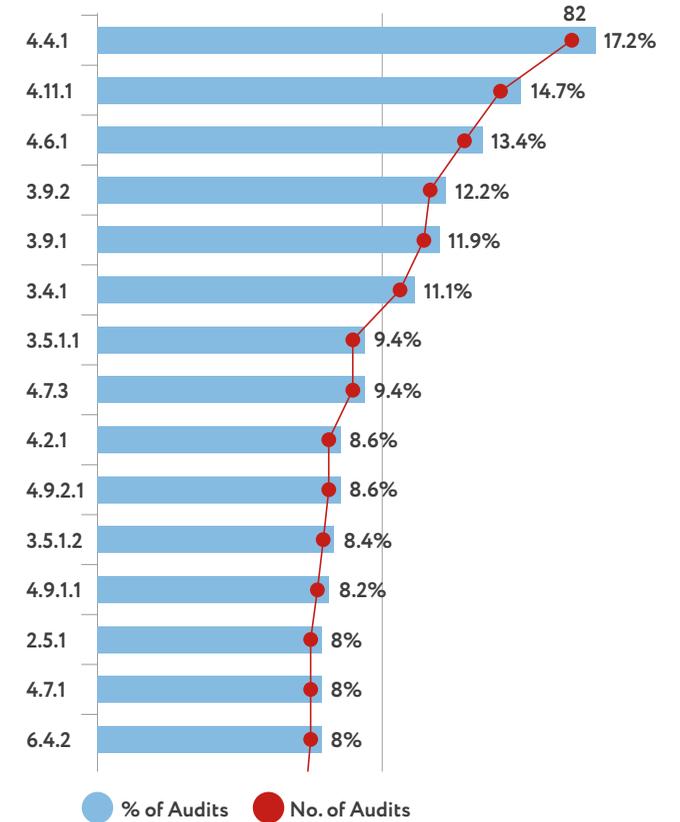
1,821	Food Safety
418	Packaging Materials
308	Storage and Distribution
200	Consumer Products
116	Agents and Brokers



**TOP AUDIT VOLUMES AVERAGE NON-CONFORMITIES PER AUDIT BY AUDITOR**



**VOLUME OF NON-CONFORMITIES BY FOOD STANDARD CLAUSE**



The Compliance team also uses the BRCGS Insight tool to inform the Technical Standard Managers on where further guidance and support is required, not only for auditors and Certification Bodies but also sites and other stakeholders. As a result, a series of webinars, guidance and support materials are available at [BRCGS Participate](#).

“The BRCGS Insight tool informs the Technical Standard Managers on where further guidance and support is required, not only for auditors and Certification Bodies but also sites and other stakeholders.”



# BRCGS Compliance Auditing Programme - Site Visits

The key to continued improvement is compliance, therefore we continued to invest significantly in our programme of compliance activities to ensure continued excellence.

In 2019, our team of internationally recognised compliance auditors grew to 20. You can meet our compliance auditors virtually at [brcgs.com/brand-owners/compliance-and-integrity](https://www.brcgs.com/brand-owners/compliance-and-integrity).

“BRCGS compliance audits are not reaudits. Instead, they focus on areas of concern. The information is then used to design a robust review of the controls, minimising the potential for issues that damage brands and potentially harm consumers.”

BRCGS performs visits to certificated sites to check how well our scheme is operating. These involve a one-day compliance audit to review the auditor’s findings and to check how well the site is continuing to meet the requirements of the Standard.

BRCGS compliance audits are not reaudits. Instead, they focus on areas of concern. The information is then used to design a robust review of the controls, minimising the potential for issues that damage brands and potentially harm consumers.

After the compliance audit, the site must action nonconformities raised to ensure they maintain their certificated status. Certification Bodies also receive a compliance audit report with areas requiring improvement. Now that BRCGS has built up some history of data, in future we will be focusing on effective root cause analysis to ensure that nonconformity issues are not repeated.

Following growth in 2018, we continued to increase the number of compliance audits in 2019.

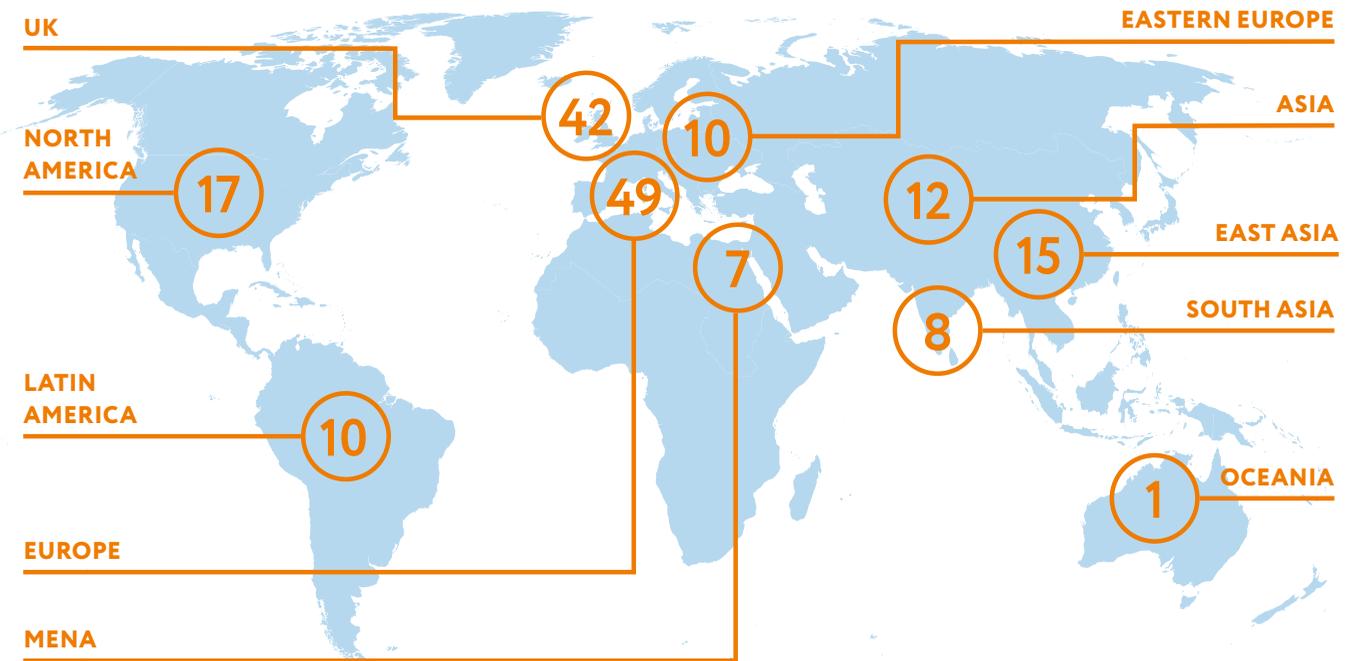
84% of our Certification Bodies were involved in

# 171

compliance visits in 25 countries, a significant increase on 2018



Number of compliance site visits by region in 2019



The compliance visits are handled directly by BRCGS, although Certification Body representatives are always invited, and attended 90% of visits in 2019. Over half – 57% – of the compliance audits were unannounced.

The Standards covered by compliance visits in 2019 were as follows:





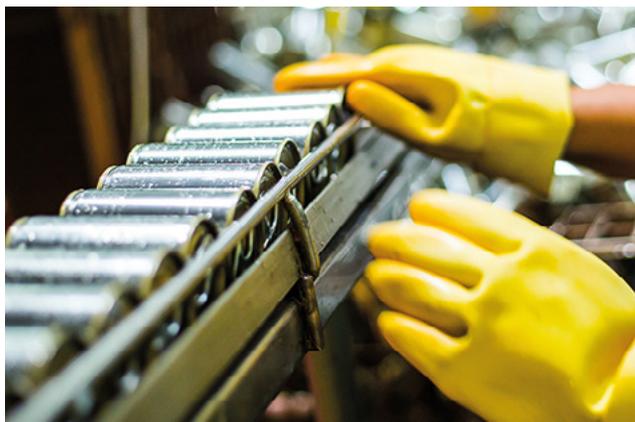
### WITNESS ASSESSMENT

Witness audits form an important role in confirming auditors can apply their expertise and knowledge, and that they possess the personal characteristics expected of a skilled auditor. They need to be ethical, logical, analytical, calm and able to communicate with personnel at all levels.

Witness auditing has always been a key part of BRCGS' requirements to ensure auditing skills are assessed every two years. Witness audits are also undertaken by accreditation bodies as part of the process for maintaining accreditation.

Historically, however, there has been no specific format or expectations for Certification Bodies, or a system to measure improvement in performance. Building on the collaborative discussions certification scheme owners had with GFSI, BRCGS carried out a review of our witness audit requirements. Significant resource and expense are required in organising these audits as they involve both Certification Bodies and audited sites. Therefore, we updated the requirements with the aim of reducing the burden of repetition while seeking to improve consistency.

In 2019, we undertook 42 witness audits across 85% of Certification Bodies. Results have generally been excellent, with further training needed for only four auditors.



## BRCGS Insight

We introduced an analytics module, in partnership with Trace One, which provides critical supply chain intelligence and an insight into your business.

Insight is an add-on to the BRCGS Directory. It is a dedicated business insight solution that provides critical supply chain intelligence through a series of dashboards and reports.

The Insight module provides vital benchmarking information to improve your business, whether you are a BRCGS certificated site, a Certification Body, or a brand owner.

[brcgs.com/digital](https://www.brcgs.com/digital)

Understanding what the issues are allows us to design the certification scheme accordingly. For example, accurate and correct labelling is a fundamental requirement of the Food Safety Standard.

We can target our analysis with precision to promote further consumer safety. We know foreign body contamination occurs more often in baked goods and fruit and vegetable products, while dairy and meat products have a higher risk of microbial contamination. Undeclared allergens are highest in confectionery, cereals and baked goods.

### QUALITY

6%

### OTHER

5%

### MICROBIAL CONTAMINATION

36%

### INCORRECT PACKAGING/LABELLING

12%

### UNDECLARED ALLERGEN

17%

### CHEMICAL CONTAMINANT

10%

### FOREIGN BODY

14%



## Product Recalls

Using the data BRCGS has available from our global audits, we focus on where we can provide the most positive impact on product safety. This includes monitoring the actions taken by sites and Certification Bodies who are required to report on root cause following product recalls at certificated sites.

On analysis of the data category for food recalls, in a number of cases the reasons are microbiological hazards, undeclared allergens and foreign bodies.

# BRCGS Product Portfolio

## BRCGS Bookshop

The **BRCGS Bookshop** provides printed copies of the BRCGS Standards, Interpretation Guidelines and many other BRCGS publications to Certification Bodies, retailers, and all registered users. Products include the Food Safety Culture Excellence assessment module and BRCGS Insight.

## BRCGS Participate

**BRCGS Participate** is an online information platform for BRCGS certificated sites and Delivery Partners. The site provides exclusive access to all BRCGS publications, webinars, case studies, white papers and reports. It offers the most convenient and flexible way to access all the content produced by BRCGS.



## BRCGS SUPPORT AND PROFESSIONAL DEVELOPMENT

**The BRCGS Academy is the central provider of training on the BRCGS Standards.**

Our priority at the BRCGS Academy is to ensure the BRCGS Standards are implemented correctly and uniformly across the world. The Standards are complex technical documents with a high volume of information making clear, professional training in their implementation paramount.

We provide a range of training courses with the objective of making sure auditors, Certification Bodies, sites and manufacturers have the very best information and training to apply the BRCGS Standards throughout their businesses.

Our understanding of the Standards does not just come from writing them. We also audit them, giving us a deep understanding of the areas people struggle with in applying them in their businesses. That means we have the knowledge and experience to adjust our training courses to make sure these areas are clear.

On top of that, our training course tutors are highly experienced practitioners with in-depth knowledge of the BRCGS Standards.

We draw on our industry expertise and knowledge, as well as feedback from our network of approved training partners, Certification Bodies, retailers and clients, to enhance our training courses. BRCGS Academy classroom-based training always includes interactive exercises and activities to give delegates the opportunity to learn from other practitioners within their industry. Whether face-to-face or e-learning, our material is of the highest quality and carefully tailored to each audience. It enables auditors to audit the Standard effectively, and sites to implement the requirements successfully.

The culmination of all this is that at BRCGS Academy we provide an enhanced level of training. We can explain the rationale behind each element of the BRCGS Standards.

Our delegates gain a full understanding of the wider context behind each Standard, enabling them to make more informed and better decisions. And we are experts at delivering that information in a way that is both engaging and memorable.

## BRCGS Professional

The world as we know it is changing. Key issues such as globalisation, urbanisation and climate change are dominating the headlines and adding huge amounts of risk to global product supply chains. Now more than ever, brand owners and consumers are looking to product safety management professionals to deliver trust and confidence in their brands and products.

To meet the challenges of this changing world, BRCGS has developed the BRCGS Professional recognition programme, which is available exclusively to BRCGS certificated sites. It is a global, holistic learning programme that encompasses all the core skills and behaviours required to both implement BRCGS standards at site level and contribute to core brand protection activities.

The learning programme is comprised of industry-leading training across the areas of BRCGS' Standards, hazard and risk management, and product safety management. The aim is to create dynamic BRCGS leaders that deliver trust for consumers and help businesses gain competitive advantage.

BRCGS Professional can help individuals demonstrate their commitment to product quality, whether they work for a Certification Body, a retailer or are an individual. We can help upskill the sector by developing talent and capability. To find out more [email us](#).



## WHAT BRCGS ACADEMY DELEGATES SAY

“Courses are professional and targeted.”

Delegate on our **Food Safety Issue 8 Lead Auditor course**

“Training course very well structured, very well-prepared teacher and clear explanation.”

Delegate on our **Vulnerability Assessment for Food Fraud course**

## WHAT OUR CURRENT BRCGS PROFESSIONALS SAY

“Any professional working in a technical role needs to be looking for constant improvement and learning. We live in such a fast-moving world that you need to keep up with all the changes by challenging and updating your knowledge continually. I have joined the programme because it was important for me, at a personal level and also for the company, to be ahead of our competitors. Having this official professional recognition will assure our customers that their product is in competent hands.”

Barbara, UK

“The structure of the certification is what I was most looking forward to, as it encompasses the most important training courses to create a well-rounded BRCGS leader.”

Frank, USA

“Being a qualified BRCGS Professional demonstrates to current and potential new clients that my product safety management skills are globally recognised.”

Angela, UK

# Stakeholder Feedback

BRCGS collects audit performance feedback through several different channels, including collaboration with specifiers and brand owners, surveys by audited sites, complaints, as well as BRCGS' own compliance activities.

Audited sites' feedback surveys are also an important channel. These assist us in maintaining excellence and compliance throughout the organisation.

The survey results show **94%** of sites are satisfied with the service from their Certification Body and rate BRCGS auditors to be of a high quality, with **88%** being good to excellent.

Sites have the right to challenge any nonconformities through a formal appeal process which provides further feedback. However, appeals run at under 0.05% of the audits undertaken, emphasising the high calibre of auditors.

# 94%

of sites are satisfied with the service from their Certification Body and rate BRCGS auditors to be of a high quality

## AUDITOR PERFORMANCE

Explain clearly how the audit would be conducted?	99.26%	0.74%
Explain clearly the nonconformities at the audit?	98.03%	1.97%
Show an understanding of the product technology at the facility?	97.29%	2.71%
Show good interviewing and listening skills?	97.04%	2.96%
Conduct a complete inspection of the entire facility?	98.28%	1.72%
Explain how you would be able to access the BRCGS Directory?	81.77%	18.23%
Provide you with a handout describing how to access the BRCGS Directory at the end of the meeting?	66.01%	33.99%
Explain clearly that your results would be on the BRCGS Directory?	92.61%	7.39%

YES NO

# Tell BRCGS Feedback, Complaints and Comments

BRCGS encourages feedback, complaints and comments. In fact, we believe success is partly achieved through the knowledge that complaints provide valuable insight for the organisation to investigate further. In addition, the implementation of an effective confidential reporting system is clearly essential and is now a requirement of several of our Global Standards.

We have, therefore, recently launched an online reporting system. To ensure integrity, all complaints are entirely confidential. And it includes an anonymous postbox, so you can retain your confidentiality while providing a platform for an ongoing conversation about the complaint. When we receive a complaint, we assess it and the appropriate action is taken.

This can include:

- Investigation by the Certification Body, which may include a site visit
- Investigation and follow-up by BRCGS, which may include further training by the certification body
- Contacting the site via BRCGS, to gain further information
- A site visit by BRCGS, with any nonconformities followed up by the certifying body
- A witnessed audit of the relevant auditor conducted by BRCGS

Complaints are always investigated and followed up to confirm sites' BRCGS certification status. The origin of the complaint is never divulged to sites.



If you wish to get in touch with BRCGS please use the contact form at [brcgs.com](https://www.brcgs.com)

If you see something wrong with a BRCGS certificated site, visit [tell.brcgs.com](https://www.tell.brcgs.com)





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