

FAQS on BRCGS certificate extension process for sites BRC072 25/3/2020 v3 process

The following scenarios should help in answering practical implementation of the BRCGS processes relevant to sites. Note the guidance is applicable to all BRCGS Standards.

Questions related to your Certificate including Certificate Extension, Risk Assessment, non-conformances during risk assessment, etc.		
S No	Question	BRCGS Comment
1	How can I apply for a certificate extension?	Please contact your CB as your audit due date approaches, prior to your certification expiry. You will need to undergo a risk assessment wherein the CB will review your processes and extend the certificate for up to 6 months if they are satisfied.
2	Is there an auto renewal process for sites?	There is no auto renewal due to COVID-19. Your site needs to undergo a risk assessment before the certificate can be extended.
3	I have contracts with clients and need to ship the material as soon as the lockdown is over. However, my site is not functional currently and my certificate will expire prior to the end of Covid 19 lockdown.	You can still apply to your Certification Body to see if a certificate extension of up to 6 months is possible. You will need to make the relevant managers available to complete the risk assessment process
4	My Certification Body is asking to do a 'risk assessment' to extend my certificate – what do I need to do?	The Certification Body will complete some background data on the history of your site to establish whether it is appropriate that a certificate extension is made. They will ask you to confirm any changes to your site since the last BRCGS audit and the impact of COVID-19. The Certification Body will ask you to send through some documents and process details which they will need to review. They will need to arrange a date with you to discuss site controls focussing on the impact of Covid 19. You will need to make appropriate managers available and be able to undertake this remotely using technology such as Skype. More help can be found here https://www.brcgs.com/resources/covid-19-response/
5	My site is functional. However, the CB wants to do a review via Skype (or similar tools) but the internet connection is not good. Can we extend the certificate?	The Certification Body will need to talk to some of the key personnel at your site and review some of your documents prior to writing their report. This may be able to be achieved in other ways such as over the telephone with documents for review emailed prior to the conversation. If the review cannot be completed adequately, the certificate cannot be extended.
6	My CB is not responding to my requests for certificate extension.	In case your local CB is unaware of the BRCGS process (which is highly unlikely as BRCGS has communicated our process publicly) please direct them to our website for our latest process https://www.brcgs.com/about/news/2020/brcgs-announces-revised-guidance-for-sites-affected-by-covid-19/

7	I am unable to connect with my CB. They are not answering my phone calls or emails.	Please contact BRCGS at enquiries@brcgs.com with full details and we will help you contact your Certification Body
8	The CB just completed a remote audit based on the BRCGS earlier process.	The Certification Body will have to cancel the remote audit and convert to the new process of completing a risk assessment. Unfortunately, GFSI are not accepting remote audits. Outcome: Certificate extension to be issued for up to 6 months No BRCGS certification fee Next audit – full on-site recertification audit
9	My site is functional, but my Quality Head is not onsite.	Your site should be ensuring that usual product safety and quality checks continue. Controls may need to be reviewed and processes adapted to normal ways of working, for example where appropriate remote systems may be just as effective. For the certification extension process, your Certification Body will need to discuss current controls at the site with appropriate managers. These managers do not have to be physically at the site at the time of the interview. There does need to be access to documentation that the Certification Body requires to complete the risk assessment.
10	My site is not able to have someone available to submit or review the COVID-19 processes required for the risk assessment.	As the situation changes rapidly and we don't know how long this situation will continue, BRCGS would encourage that sites complete the certificate extension process. If the site cannot complete the risk assessment and satisfy the Certification Body, then the certificate will lapse.
11	I am unable to complete the certificate extension process. The certificate has expired/will expire prior to the full audit. Will I get a major non-conformance?	We would encourage you to undergo the risk assessment with your CB. However, if this is not completed, then the certificate will expire. There will be no penalty of a non conformity for late audits due to COVID-19.
12	My site currently has a grade C certificate. My Certification Body has told me I cannot have a certificate extension.	The certificate extension process is based on a risk assessment. Unfortunately, those sites with grades C or D are deemed high risk and are not eligible for a certificate extension. Your current certificate will expire.
13	I am unaware of what changes I need to undertake for ensuring product integrity in my site during the current situation.	BRCGS has put together a resource page to support sites in the current situation. It has guidance under various heads which you will find helpful. Please https://www.brcgs.com/resources/covid-19-response/ for more details.
14	My risk assessment and site discussion occurred past the due date – will I get a major non conformity?	No, we understand that changing arrangements and making sure someone is available may take some time. There will be no penalty for it being past the audit due date.

		However, we encourage that you discuss with your certification body to ensure it occurs in good time before the certificate expiry.
15	My CB conducted a risk assessment but has raised doubts about my operation and concerns about continuing certification. What do I do?	<p>The Certification Body needs to be confident that the site maintains appropriate controls to be able to supply safe products and is operating to the BRCGS Standards. The CB will not be able to extend the certificate if it has concerns which cannot be rectified through the usual corrective action process.</p> <p>There will be no major non conformity raised against the late audit requirement during the next full audit.</p>
16	How soon must the risk assessment to confirm the certificate extension take place to ensure certificates don't expire?	We recognise at the moment production and distribution facilities are under severe pressure to keep the food supply chains open. We would encourage that the assessment is completed in good time to ensure the current certificate does not expire. This maybe beyond the audit due date but prior to certificate expiry.
17	I have the ASDA certificate. Can it be extended through the risk assessment process?	Yes. The requirements of the additional voluntary modules including Asda can be included in the risk assessment scope.
18	I have additional modules in my site's current certification. Can these be extended?	Yes. Please communicate this to your Certification Body. Your CB will need to ensure that they cover in sufficient detail the controls in place at the site to be confident of including the module within the certificate extension. Therefore, within the discussion it needs to be confirmed whether there has been any changes or impact of COVID-19 to the specific module.
19	Will I get action points after the Risk Assessment?	During the Risk Assessment discussion with the Certification Body, where concerns are highlighted, these will be raised as 'action points' and documented on the report format. The Certification Body shall agree with the site a process where these can be actioned – this shall include an appropriate timeline (as short as possible). The Certification Body needs to have sufficient confidence to be able to extend the certificate. Where doubts remain or issues unactioned, the certificate shall expire.
20	We have undertaken the Risk Assessment. The CB has given us action points, but we are unable to take corrective action/send evidence to the CB right now. We can do so once the site is back to being fully functional. Can we get our certificate extended?	If the site is not able to send evidence of corrective action to enable the Certification Body to have confidence in extending the certificate, then the current certificate will expire. We would expect the site to work with Certification Body and agree appropriate timelines but would suggest this should not exceed 42 days.
21	What will my extended certificate say?	Any certificate extensions will denote 'extension due to COVID-19' under the 'audit programme box'
22	Will BRCGS charge a fee for certificate extension?	There is no BRCGS fee due for the certificate extension. The Certification Body will need to charge for the time taken for undertaking and reporting the risk assessment.
23	My Internal audits reviews have fallen behind due to	Sites still need to meet the requirements of the Standard and Certification Bodies need to see evidence of

	<ul style="list-style-type: none"> • lack of internal staff • banning of external consultants onto sites <p>Will I receive non conformities if I am behind schedule?</p>	<p>compliance and will raise 'action points' where this is not the case. In these unprecedented times, product safety systems will be pressurised, and it is arguably even more vital that sites ensure good practices of which the internal audit programme is a powerful tool.</p> <p>So, it may be about review and prioritisation – to maintain the internal audits of the most vital systems, GMP inspections, etc, and update scheduling of audits of less vital systems.</p> <p>Sites may need to adapt their normal ways of working, for example where appropriate to the subject being audited such as documentation, remote systems may be just as effective.</p>
24	<p>My Management review meetings have fallen behind due to lack of internal staff. Will I receive non conformities for this?</p>	<p>Sites still need to meet the requirements of the Standard and Certification Bodies need to see evidence of compliance and will raise 'action points' that need to be corrected where this is not the case. We would expect sites to specifically have crisis management systems in place and have considered the impact of COVID-19 on their business which CBs shall challenge. It would be expected that management meetings to discuss impacts will be happening at a more frequent basis during this time.</p> <p>Sites, for example, should have considered impact of staff availability with contingency plans in place. They shall have updated their screening processes for current staff and agency staff and have a policy in place for staff members who may have been exposed to COVID-19. The site shall have considered requirements for additional or increased cleaning for surfaces, e.g. in the staff canteen. Sites have contingency plans in place for ingredient supply that may be affected.</p>
25	<p>We have banned external contractors from coming on site e.g. pest control, equipment maintenance. Will this be raised as an issue?</p>	<p>Sites still need to meet the requirements of the Standard and Certification Bodies need to see evidence of compliance and raise action points where this is not the case.</p> <p>It is recognised that access to sites is currently challenging for many service providers due to the ongoing circumstances relating to Covid-19. The site is responsible for reviewing their processes to ensure the continued production of safe products. The site must therefore have sufficient controls in place to ensure continuation of safe production. It is the site's responsibility to ensure they look at options and decide how this happens.</p>

Questions related to your audit, certification body, change in scopes, locations, etc.		
S No	Question	BRCGS Comment
26	<p>My site is functional but</p> <ul style="list-style-type: none"> We are not letting anyone into our facility as part of our COVID-19 prevention plan Auditors are unable to travel 	<p>You can contact your Certifying Body as your audit becomes due who can conduct a risk assessment process</p> <p>Outcome: Certificate extension to be issued for 6 months</p> <p>No BRCGS certification fee</p> <p>Next audit – full on-site recertification audit</p> <p>For details visit - https://www.brcgs.com/about/news/2020/brcgs-announces-revised-guidance-for-sites-affected-by-covid-19/</p>
27	My certificate has expired. How soon can I get the new audit done and certificate issued?	Please contact your CB to get the exact timelines.
28	<p>We are a new site and would like to go through the BRCGS certification process. But my site cannot be audited as (any one or all listed below)</p> <ul style="list-style-type: none"> Auditor cannot travel We are not letting visitors into our facility due to COVID-19 protocols Our facility is not functional due to COVID-19 	You need to have a full onsite audit by an approved Certification Body to be certificated. You will have to wait until favourable conditions are in place and the CB auditor can travel to your site for an onsite audit.
29	We just moved to a new facility. Our certificate for the old site is still valid. Can we extend the old one to the new site?	Unfortunately, the certificate extension process is in place to be able to extend current certificates for the same site address. The new site will need to undergo a full audit. Please speak to your certification body to arrange this.
30	I would like a change in scope while extending the certificate.	Changes in scope is only possible during an onsite audit and not during certificate extensions through risk assessment. You will have to wait for the full onsite audit for any scope changes.
31	I had plans to change my CB.	Unfortunately, the certificate extension process is in place to be able to extend current certificates and does not allow you to go to a new CB. Certificate extension is only available through the CB that has issued the current certificate.
32	<p>We are a new site wanting to get certified. An onsite audit is not possible currently. However,</p> <ul style="list-style-type: none"> We have signed a contract with the CB We have paid the CB 	Unfortunately, the certificate extension process is in place to be able to extend current certificates. New sites will have to undergo a full onsite audit.
33	My certificate cannot be extended. How do I ensure that	Your Certification Body will not a raise a non conformity for late audits due to COVID-19 at your next onsite audit.

	there is no non-conformance raised in the next full audit?	
34	My certificate has been extended. Should I wait till I am closer to the extended expiry date for scheduling the full onsite audit?	Despite the certificate extension, your next onsite audit is due as soon as possible after travel restrictions are lifted. Please discuss with your Certification Body. There will be challenges on auditor availability and travel issues, etc.
35	I am on the unannounced audit program and my audit is due. What do I do?	Unannounced audits are now cancelled. Please speak to your Certification Body about arranging an onsite announced audit. If your site is not accepting auditors, talk to your Certification Body about arranging a risk assessment and certificate extension.
36	My site was within the unannounced scheme and the audit will now mandatorily change to announced. What will be their resulting grade?	Where a site has an onsite physical announced audit, the grading of the new certificate issued will be to the announced scheme
37	My site is seasonal – there is concern that there won't be any production when the full audit is due on site.	BRCGS recognise that there will be issues to work through that have been caused by the processes that have had to be put in place to satisfy GFSI and the issues caused by COVID-19. We are working on addressing this and will update you soon. Please be in touch with your Certification Body.