

# BRCGS Global Standard Storage & Distribution, Issue 4

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## SD404: Position Statements for Issue 4

### Document Scope

Where clarification of interpretation of a requirement of the Global Standard for Storage and Distribution, Issue 4 or its protocol is necessary this will be published on the BRCGS website ([www.brcgs.com](http://www.brcgs.com)) as a Position Statement. Such statements are mandatory in their use from the date specified for implementation or the date of publication on the BRCGS website, where no date is specified.

### Change log

Version no.	Date	Description
1	15/01/2021	Position Statement 1- Section 9: Open Product Handling – Trimming of fresh produce for aesthetic purposes only
2	17/03/2021	<b>*NEW*</b> Position Statement 2- Transport Only Scope: Use of BRCGS S&D logo
2.1	17/03/2021	Small change - footer amended.

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## **POSITION STATEMENT - 1**

### **Section 9: Open Product Handling- trimming of fresh produce for aesthetic purposes only**

This Position Statement summarises BRCGS expectations in terms of Section 9: Open Product Handling where a site currently certified to the Issue 3 of the S&D Standard completes trimming operation on fresh produce for aesthetic purposes only.

According to the definitions in appendix 6 of the Standard, although operations such as trimming are usually excluded from the scope of Storage and Distribution activities due to the following reasons:

- Processing, however minimal is not allowed as the food safety risks associated with these activities was not a consideration while drafting the standard
- Furthermore, experience has shown that sometimes even minor changes through processing conditions can have a significant effect on the safety of foods.

However, the Standard recognises that occasionally trimming operation is completed to enhance the visual attributes of the fresh produce and this additional processing step does not introduce any additional food safety implications or a new food safety process step.

Where a site currently certificated to Issue 3 of the Standard is completing trimming operations on fresh produce for aesthetic purposes only, they must complete a risk assessment and suitably demonstrate the food safety rationale behind this operation (i.e. explain the criteria that maintains food safety) to their certification body, who in turn can request a concession with the BRCGS team. Upon confirmation from the BRCGS team, site can continue to include this operation under their main certification audit. Once agreed the concession will be valid for the lifetime of Issue 4 of the S&D Standard.

Key criteria for consideration:

1. Only sites certificated to Issue 3 of the S&D standard can request a concession.
2. Trimming operations on fresh produce is competed for aesthetic purposes only
3. Ready to Eat (RTE) fresh produce is excluded from scope of this activity.
4. No new food safety process steps are introduced to complete this activity.

Auditors are required to challenge the basis of the risk assessment and the food safety rationale to make sure the site has carefully considered likely issues and is demonstrably based on robust science, where applicable. Additionally, the auditor must successfully complete an additional webinar on auditing techniques which will be available on BRCGS Educate, access to which will be granted by the certification bodies to their auditors.

**Section 9: Open Product Handling- Trimming for aesthetic purposes only**

<b>SITE</b>  Define activities	<ul style="list-style-type: none"> <li>Check product included within scope.</li> <li>Trimming completed for aesthetic purposes only</li> </ul>
<b>SITE</b>  Food Safety Rationale	<ul style="list-style-type: none"> <li>Conduct a risk assessment</li> <li>Food Safety Rationale- explain criteria that maintains food safety</li> <li>Document food safety rationale and submit to the CB</li> </ul>
<b>SITE &amp; CERTIFICATION BODY</b>  Discussion	<ul style="list-style-type: none"> <li>CB to analyse and accept the food safety rationale</li> </ul>
<b>CERTIFICATION BODY &amp; BRCGS</b>  Agree Concession	<ul style="list-style-type: none"> <li>CB to submit a concession request to BRCGS Compliance team</li> <li>Capture concession number on the report</li> </ul>
<b>AUDITOR</b>  Assess effectiveness	<ul style="list-style-type: none"> <li>Complete the webinar on auditing techniques</li> <li>Review food safety rationale during the site audit</li> </ul>

**Statement publication date:** 15/01/2021

## **POSITION STATEMENT – 2**

### **Transport Only Scope: Use of BRCGS S&D logo**

Sites certificated to the 'Transport only' scope are now eligible to use the BRCGS S&D logo, as explained in 'BRCGS S&D Issue 3-Part III Section 5.6- BRCGS logos' or 'BRCGS S&D Issue 4- Part III Section 6.6 – BRCGS logos.

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