



# Guidance for Brands and Specifiers

(March 2021)

Top 5 recommendations for returning to onsite  
audits of your suppliers

## Purpose

Throughout the pandemic, BRCGS has continued to publish regular guidance and information to support the industry. We also launched a number of initiatives, either as temporary or permanent solutions to ensure continued certification for suppliers and ongoing customer assurance.

As many economies around the world start to lift travel and business restrictions, a gradual return to onsite audits (and eventually unannounced audits) can be considered a growing possibility.

However, a return to onsite audits must be carefully planned for as there are significant considerations to take into account. This guidance is aimed at Brands and Specifiers to help manage this process change.

## External Factors to consider



There is a significant backlog of audits to be completed, and a limited number of auditors to carry out these audits. The number of newly qualified auditors has been lower than average in the last 12 months, and the exit from the industry of a higher number of auditors has exacerbated the situation.



Restrictions will lift in countries and Regions at different times. Suppliers will therefore be subject to different local regulations and conditions which they must understand and accept. However, these variable controls and conditions will assist specifiers to prioritise as certain geographies will be open before others.



Many audits require international or regional travel. In some cases, this will not be possible.



Protective measures for supplier sites to protect employees and the facility will be determined locally and based on health authority and corporate guidance. These measures need to be equally informed by risk, and your needs as a specifier.



Decisions will be driven by Occupational Health and Safety laws and personal safety first, and business need second. This is the law in most countries and cannot be circumvented.



Many countries have introduced mandatory quarantine measures for certain travel (domestic and international). The subsequent loss and cost of auditor resources through mandatory quarantine periods would further negatively impact the situation.

## Available options

There are essentially three options to consider, based on risk, and ability:




**An onsite audit**  
(either fully onsite, or blended)



**A remote audit**  
(with or without support)



**Certificate extension**  
(Where a site has not used the extension option. Suppliers are permitted this option once)



### Unannounced audits

Unannounced audits will be the most complex and costly to resume. There are ethical (and potential legal) issues to consider when asking auditors to enter a facility without being made aware of the risks, such as whether there are active Covid cases onsite. The same applies to the site that may be required to know the auditors travel history. The value of unannounced audits is well accepted, and will be re-introduced where it is safe to do so. BRCGS will keep this under review.

## 5 Recommendations

### 1 Prioritize risk assessments

Specifiers should prioritize their suppliers audit requirements based on various risk factors. This would include identifying those suppliers that cannot be used without an onsite audit, suppliers that have the option of the single certification extension, and those that would be acceptable for remote audit.

As specifiers, you will have different risk outcomes, and so these positions will need to be communicated to your suppliers. Core risk factors are likely to include:

- Overview of Product performance monitoring/KPIs (such as increased complaints/recalls/laboratory non-conformances linked to the site)
- Maturity, history and trust in the relationship between supplier and specifier
- Inherent risk of the product
- Regional, vulnerability, or other unique risks
- Seasonality of production restrictions

In some cases, it may be preferable to allow suppliers who have not used an extension to take that option as this would allow auditor resources to be allocated to more critical areas. For example, if a similar site has already extended its certificate and is at risk of expiring.

Risk assessment and prioritization of supplier audits **must** be completed by specifiers.

## 2 Flexible Supplier Approval Policies

Given the unexpected events and evolving conditions resulting from the pandemic, you may need to adjust your supplier approval policy. Where an onsite audit was required without exception, a consideration should be included that weighs up the impact of removing a supplier or whether there are alternative approval mechanisms.

Adjustments, where required, to supplier approval policies are warranted.

## 3 Use Independent Technical Experts

In specific cases, where local audit capacity is unavailable, but an onsite assessment is required, a certification body may at times be able to include an independent onsite “technical expert” to support the remote based BRCGS auditor.

An individual qualified to assess the onsite needs, under direct supervision of the auditor, can add significant benefit. While having qualified “eyes and ears” onsite for the auditor is an option, it will not currently satisfy GFSI benchmarking.

This approach must accept that:

- The audit will be more expensive as an additional person is being used
- This is only possible where the certification body has qualified local resources, and the use of local resources is acceptable to the supplier (this may be useful where international travel restrictions prevent an auditor from reaching the site).

## 4 Communicate your supplier expectations

As a specifier, you must clearly communicate your expectations to your suppliers.

## 5 Support from BRCGS Business Development team

If you would like help, our Business Development Team can support you to manage the process. This can include guidance in planning and prioritizing audits, communicating with certification bodies that have available resources, and communicating expectations with suppliers.

For all the details on the response BRCGS has put into place to support the industry you can visit our COVID-19 Hub.

The infographic is divided into three main sections:

- EXTERNAL RISK FACTORS:**
  - Audit backlog and limited resource
  - The lifting of restrictions will vary by economy
  - International traffic will not be possible in all cases
  - Sites will be subject to local protective measures and H&S laws
  - Mandatory quarantining will impact on cost and resource
- AUDIT OPTIONS:**
  - An onsite audit (either fully onsite, or blended)
  - A remote audit (with or without support)
  - Certificate extension (Where a site has not used the extension option. Suppliers are permitted this option once)
- TOP 5 RECOMMENDATIONS FOR SPECIFIERS:**
  - 1 Prioritize Risk Assessments based on risk factors
  - 2 Consider introducing flexible Supplier Approval Policies
  - 3 Consider using Independent Technical Experts through Certification Bodies
  - 4 Clearly communicate your supplier expectations
  - 5 Consider using BRCGS Business Development Team to support your planning and supplier communications

# BRCGS

**CHICAGO**  
**LONDON**  
**NEW DELHI**  
**SHANGHAI**  
**TORONTO**

**T:** +44 (0)20 3931 8150  
**E:** [enquiries@brcgs.com](mailto:enquiries@brcgs.com)  
**brcgs.com**