

Global Standard Agents and Brokers, Issue 3

AB310: Position Statements for Issue 3

Document Scope:

During the lifetime of a published Standard the BRCGS Technical committee may be asked to either review the wording of a clause in the Standard, provide an interpretation for a requirement or rule on the grading of non-conformity against a clause. Any such judgements are defined in position statements. Position statements are binding on the way that the audit and certification process shall be carried out and are an extension to the Standard. This document contains a summary of the position statements for the BRCGS Standard for Agents and Brokers Issue 3.

Change log:

Version no.	Date	Description
1	14/02/2022	First publication of BRCGS position statements for Issue 3.

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1. Clarification on scope of certification for agents with limited operations (haulage or shipping agents)

The Standard sets out the requirements for companies in the food, packaging and consumer products supply chain that buy, sell, or facilitate the trade of products and may provide additional services such as the purchase, importation, or distribution of the products, but do not manufacture or process those products.

BRCGS have received enquiries relating to this scope, particularly the definition of 'facilitates the trade' and whether haulage or shipping agents can be certificated. These types of organisations often have limited operations and may not, during the normal course of their business complete all the services referred in the Standard or these activities may be undertaken by their customers.

This Position Statement therefore lists the mandatory clauses (i.e. those clauses which must be included within the scope of the audit and cannot be excluded or considered as 'not applicable'). These mandatory clauses are:

Clauses	Details of the requirements
Section 1	All requirements mandatory.
Section 2	All requirements mandatory.
Section 3	All requirements mandatory. Some agents have highlighted that specifications (section 3.6) are managed by the customer. Whilst it is possible that the customer will manage much of the content and process for specifications, making compliance with these clauses easier for the site, the availability of the information included on a specification is important, since along with product risk assessment (see below) it will be key when developing and reviewing the HACCP or hazard and risk assessment processes. Therefore, the expectation is that specifications are available and up to date.
Section 4.1	Clauses 4.1.1- Mandatory. Clause 4.1.2 states: 'this clause may not be applicable where it is a customer requirement that products are supplied by a specific manufacturer and the liability is with that customer. A record of the customer's requirement for the use of a specific supplier shall be maintained'. Therefore, this clause may not be applicable where the customer has liability and completes the activity. Appropriate documentation demonstrating this shall be maintained." Clause 4.1.3 – Mandatory. Clauses 4.1.4 and 4.1.5 – these clauses are applicable (and must be included) where purchases are made from other agents or brokers. Clauses 4.1.6 - 4.1.8 – these clauses shall apply to all sites where clause 4.1.2 applies.
Section 4.2	Where services are provided - all requirements are mandatory. Where no services are provided these clauses will not be applicable.

Section 4.3	All requirements are mandatory.
Section 4.4	4.4.1- allows that the product verification testing can be completed by the supplier.
Section 4.5	Clause 4.5.1 states that 'where such responsibilities are undertaken by the customer, this shall be clearly stated in the contracts.' Therefore this clause may not be applicable where the customer has liability and completes the activity. Appropriate documentation demonstrating shall be maintained.
Section 4.6 – 4.7	Standard already permits these sections to be not applicable.
Section 4.8	All requirements are mandatory.
Section 4.9	Standard already permits this section to be not applicable.
Section 5	All requirements are mandatory.

2. Clarification of the audit protocol for exclusions from scope and use of the BRCGS logo (protocol section 1.6.2)

Issue 3 of the Global Standard for Agents & Brokers states (protocol section 1.6.2):

'There are two situations where an exclusion may be permitted:

- Certificates are issued to the company for specific office locations (sites). It is permissible for a company to have some offices certified under the scheme and other offices not to be included, or
- The Standard is applicable to three types of products: food, packaging or consumer products. Sites are permitted to exclude a type of product (e.g. consumer products); however, it is only permitted to exclude the entire type of product. It is not acceptable to include some food products in scope and exclude others (e.g. include chilled and frozen foods but exclude ambient foods), or to include some consumer products and exclude others. For example, a site handling both food and consumer products shall have a scope that either:
 - includes all food products and all consumer products, or
 - includes all food products and excludes all consumer products, or
 - excludes all food products and includes all consumer products.

The BRCGS logo can only be used by sites that have no product exclusions.'

It should be noted that the reference to the BRCGS logo specifically states that the certificated office cannot exclude products if they wish to use the logo. Exclusion of specific office locations from the audit scope does not prevent the use of the BRCGS logo, but logo use by the company must not imply products or processes managed by an excluded office are certificated.

All use of the BRCGS logo shall be in accordance with BRCGS brand guidelines (available on the BRCGS website).