BRCGS Plant-Based

Auditor Checklist and

Site Self-Assessment Tool

1 Senior management commitment

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 1.1 | The site shall have a current copy of the Standard available. |  |  |
| 1.2 | The site must have current Schedule A, which lists all plant-based products that will be recognized under the Standard, that has been approved by BRCGS and is less than 1 year old. |  |  |
| 1.3 | The site’s senior management shall demonstrate their commitment to meeting the requirements of the Standard by ensuring the site’s overall food safety and/or quality management system addresses the elements of the PBMS. This may include, but is not limited to:   * ensuring the letter of commitment or policy addresses the production of plant-based products that conform to the Standard requirements * ensuring that management responsibility policies, organization structures, etc., include responsibilities related to the PBMS * designating a qualified individual with appropriate knowledge and training to oversee the PBMS * ensuring that the management review process includes the PBMS * ensuring that resource management policies accommodate the PBMS |  |  |

2 The Food Safety Plan - HACCP

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 2.1 | The company shall have a fully implemented and effective food safety plan incorporating the Codex Alimentarius HACCP Principles. The Food Safety Plan must include an assessment of plant-based products and potential contamination with materials of animal origin. |  |  |

3 PBMS maintenance and reassessment

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 3.1 | The PBMS shall be reviewed at least annually and prior to any changes that may impact the integrity of the plant-based product and claim. These changes may include:   * change in ingredients or inputs intended for use in plant-based products * change in supplier of ingredients or inputs intended for plant-based products * change in ingredients/recipe * change in processing conditions, process flow, or equipment * change in packaging, storage, or distribution conditions * emergence of a new risk (e.g., known adulteration of an ingredient or other relevant, published information, e.g., a recall of a similar product) * changes required following a recall or withdrawal * new developments in scientific and/or regulatory information associated with ingredients, process, or product * nonconformities identified during monitoring and verification activities * consumer/client complaints * nonconformities identified during audits or surveys done by government agencies such as the national, regulatory competent authority * change in production volume that impacts on the product flow, sanitation schedule, employee training, etc.   Appropriate changes resulting from the review shall be incorporated into the PBMS, communicated appropriately through training, and fully documented, and the validation recorded. |  |  |

4 Documentation and Records

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 4.1 | The site’s document control policies and procedures shall include the management of documents that form part of the PBMS. This shall include:   * a list of all controlled documents, indicating the latest version number * the method for the identification and authorization of controlled documents * a record of the reason for any changes or amendments to documents * the system for the replacement of existing documents when these are updated.   Where documents are stored in electronic form these shall also be:   * stored securely (e.g., authorized access, control of amendments, password protected) * backed up to prevent loss. |  |  |
| 4.2 | Recordkeeping policies and procedures shall include the management of PBMS records to demonstrate the effective application of the Standard and to facilitate official verifications by the BRCGS approved auditor or other competent authority. |  |  |

5 Internal audits

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 5.1 | The PBMS and the procedures and activities implemented to achieve the requirements of the Standard shall be included in the site’s scheduled program of internal audits. The frequency at which each activity is audited within the scheduled program shall be established in relation to the risks associated with the activity and previous audit performance; all activities shall be covered at least once each year. |  |  |

6 Supplier and ingredients/inputs approval and performance monitoring

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 6.1 | Procedures and/or policies related to purchasing of all ingredients and inputs shall be developed and implemented to ensure control and identification of ingredients and inputs containing materials of animal origin.  The site shall undertake a documented risk assessment of all ingredients and inputs, to identify potential materials of animal origin (including hidden sources of materials of animal origin). The risk assessment shall form the basis for acceptance of ingredients and inputs intended for use in plant-based products, as well as for any testing procedures and processes adopted for supplier approval and monitoring.  The risk assessment must be current and shall be updated:   * when there is a change in ingredients or inputs intended for use in plant-based products, in the processing of ingredients or inputs intended for use in plant-based products, or in the supplier of ingredients or inputs intended for use in plant-based products * when a new risk emerges of material of animal origin contamination emerges * when there is a product recall or withdrawal in which a specific ingredient or input intended for use in plant-based products is implicated. * at least every 3 years |  |  |
| 6.2 | The site’s supplier approval procedure shall ensure that all suppliers and emergency suppliers of ingredients or inputs intended for plant-based products effectively manage risks of contamination with material of animal origin and are operating effective traceability processes. The approval procedure shall include, at a minimum:   * a valid certificate to show that the site conforms to the Standard and the ingredient or input intended for use in plant-based products is listed on the supplier’s current Schedule A   or all of the following:   * a supplier questionnaire, with a scope that includes control of materials of animal origin, and status of each applicable ingredient or input, that has been reviewed and verified by a qualified individual or their designate * the specification for each applicable input, ingredient, ingredient blend, and component of ingredient blends (as applicable) that has been reviewed and agreed upon by a demonstrably competent person. * documentation (e.g., letter of guarantee) indicating that the supplier shall meet the site’s specifications and notify the site when a change is made to the applicable ingredient blend formula, and confirmation that such changes will not be made without prior approval from the site. |  |  |
| 6.3 | The site’s supplier performance review procedures shall include criteria for evaluating suppliers of ingredients or inputs intended for plant-based products on their ongoing ability to provide ingredients that conform to the requirements of the Standard (e.g., free from material of animal origin). |  |  |
| 6.4 | The approved supplier list (or equivalent) shall include identification of suppliers of ingredients or inputs intended for plant-based products. The information shall be readily available to relevant staff (e.g., at receipt of goods). |  |  |
| 6.5 | Co-manufacturers shall each hold valid certificate to show that the site conforms to the Standard. The product co-manufactured must be listed on the supplier’s current Schedule A. |  |  |

7 Ingredient and Input Receipt and Acceptance

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 7.1 | The site shall have a procedure for accepting ingredients or inputs intended for plant-based products as they are received. This procedure shall be based upon the risk assessment, and must consider:   * sampling and testing * visual inspection on receipt * certificates of analysis for relevant testing (specific to each consignment) from an accredited laboratory * any other means necessary to satisfy the risk assessment.   There shall be a list of incoming ingredients or inputs intended for plant-based products and inputs and the requirements to be met for their acceptance. The parameters for acceptance and frequency of testing shall be clearly defined, implemented, and reviewed. |  |  |
| 7.2 | Procedures shall be in place to ensure that approved changes to ingredients or inputs intended for plant-based products and inputs, or of suppliers, are communicated to personnel in charge of goods receipt and to ensure that only the correct version of each plant-based ingredient and input is accepted (for example, when labels or printed packaging have been amended). Only the correct version shall be released into production. |  |  |
| 7.3 | Procedures shall be in place to confirm that that externally printed labels meet the specifications agreed on between the supplier and the site and that there is a documented physical comparison of received labels to approved labels. |  |  |
| 7.4 | Where applicable, procedures and/or policies concerning labels shall be developed and implemented to ensure that the labels of approved ingredients received match the site’s finished product list of ingredients and components of ingredients. |  |  |

8 Suppliers of Services

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 8.1 | The site’s approval and monitoring process shall take into consideration potential risks to plant-based products (e.g. cross contamination).  Services that should be assessed shall include, as appropriate:   * pest control * laundry services * contracted cleaning * contracted servicing and maintenance of equipment * transport and distribution * off-site storage of ingredients, packaging or products * laboratory testing * waste management |  |  |
| 8.2 | Contracts or formal agreements with the suppliers of services shall ensure potential risks to plant-based products associated with any services have been addressed. |  |  |

9 Specifications

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 9.1 | Specifications for ingredients and inputs intended for use in a plant-based product shall be adequate and accurate and shall demonstrate that the ingredient or input is free from ingredients of animal origin. |  |  |
| 9.2 | Accurate and up-to-date specifications shall be available for all plant-based finished products and must demonstrate that the product is free from ingredients of animal origin.  These specifications may either be in the form of a printed or electronic document or part of an online specification system |  |  |
| 9.3 | Specification review shall be sufficiently frequent to ensure that data is current or at a minimum every 3 years, taking into account product changes, suppliers, regulations and other risks. |  |  |

10 Traceability

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 10.1 | At least annually, the site shall test the traceability system on a plant-based product to ensure that traceability can be determined from the supplier of ingredients and inputs intended for use in plant-based products to the finished product and vice versa, including quantity check / mass balance.  The site shall maintain purchasing records, traceability of ingredient or input usage and final product packing records to substantiate the plant-based claim. |  |  |

11 Complaint handling

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 11.1 | All complaints related to plant-based products shall be recorded. Substantiated complaints shall be investigated, and a root cause analysis performed. Results of that investigation shall be recorded. Preventive and corrective actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff. |  |  |

12 Product Recall and Withdrawal

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 12.1 | In the event of a recall or withdrawal of a plant-based product, resulting from the contamination of a plant-based product with material(s) of animal origin, the site shall notify the certification body that issued the current certificate for the site against the Standard, within 24 hours of the date of release of the official recall or withdrawal notice. |  |  |

13 Product development

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 13.1 | The site shall provide clear guidelines on the restriction of materials of animal origin in new plant-based product development (see Appendix 4 Common Materials of Animal Origin). |  |  |
| 13.2 | All new plant-based products and changes to plant-based product formulation, packaging or methods of processing shall be formally approved by the HACCP team and by the qualified individual for the Plant-Based Global Standard. This shall ensure that hazards have been assessed and suitable controls, identified through the HACCP system, are implemented. This approval shall be granted before products are introduced into the factory environment. |  |  |

14 Approval and control of labels

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 14.1 | Procedures and/or policies shall be developed and implemented to ensure proper control of new or modified plant-based product labels. As a minimum, this must include a label approval process that includes steps to be followed in the case of reapproval of product labels following modifications to existing product formulations. |  |  |
| 14.2 | Where applicable, procedures related to labeling of finished products shall be developed and implemented to ensure that the information on the finished product label accurately represents the product name and the composition of the product on which the label is affixed.  Where the label information is the responsibility of a customer or a nominated third party the company shall provide:   * information to enable the label to be accurately created * updates whenever a change occurs that may affect the label information. |  |  |

15 Product authenticity, claims and chain of custody

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 15.1 | The company shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of adulteration or substitution of ingredients or inputs (e.g., fraudulent raw materials). Such information may, for example, come from:   * trade associations * government sources * private resource centers |  |  |
| 15.2 | A documented vulnerability assessment shall be carried out on all ingredients and inputs intended for use in plant-based products, or groups of ingredients and inputs intended for use in plant-based products, to assess the potential risk of adulteration or substitution with materials of animal origin. This assessment shall take into account:   * historical evidence of substitution or adulteration * economic factors which may make adulteration or substitution more attractive * ease of access to ingredients and inputs intended for use in plant-based products through the supply chain * sophistication of routine testing to identify adulterants * nature of the ingredients and inputs.   The output from this assessment shall be a documented vulnerability assessment plan.  This plan shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risks. It shall be formally reviewed annually. |  |  |
| 15.3 | Where ingredients and/or inputs are identified as being at particular risk of adulteration or substitution, the vulnerability assessment plan shall include appropriate assurance and/or testing processes to mitigate the identified risk(s). |  |  |

16 Marketing claims

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 16.1 | Any reference to the Standard and/or trademark(s), including statements on labels, advertising, marketing, and communication material (whether in print and/or digital/online or other media) must be:   * approved by BRCGS * in compliance with the Plant-Based Global Standard Trademark Usage Guide and/or the requirements of the owner of the trademark or statement * in compliance with the legislation of the country where the product will be sold. |  |  |
| 16.2 | Where certification to this Standard is used as part of the verification process for an “animal/meat free” claim other than the BRCGS plant-based symbol, the site shall have:   * a written definition for the claim and labelling rules * an agreed contract for the use of any externally managed marks * approval for the use of externally managed marks on each product to which they are applied. |  |  |

17 Cross contamination control

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 17.1 | Where applicable, and based on risk, the procedures and/or policies shall be developed and implemented to control cross-contamination of material of animal origin into plant-based products. At a minimum, consideration shall be given to the following procedures:   * production scheduling if dedicated lines for plant-based products are not available * employee traffic patterns * traffic flow and handling during receiving, ingredient and finished product storage, processing, and packaging * dedicated uniforms and personal protective equipment * dedicated or segregated storage * the identification and sanitation of bulk containers * dedicated utensils, equipment and areas * the handling and storage of rework product(s) * the use of equipment, tools, and utensils with sound sanitary design * the cleaning of equipment and of product contact surfaces/areas during operations if dedicated lines/equipment/areas for plant-based production are not available * dedicated maintenance and engineering tools * appropriate airflow * where there is potential for cross-contamination, ingredients that are used in both plant-based and non-plant-based formulas must be controlled and separated. |  |  |

18 Control of recipes and formulations

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 18.1 | Procedures associated with weighing/blending/mixing/formulation shall be developed and implemented to ensure that the correct ingredient is added to the correct product as indicated in the formula. |  |  |
| 18.2 | Where applicable, procedures and/or policies related to the use of rework shall be developed and implemented to prevent the introduction of materials of animal origin into a plant-based product (e.g., control and labeling). |  |  |
| 18.3 | Procedures and/or policies shall be developed and implemented to ensure the correct identification and labeling of ingredients and work in progress. |  |  |

19 Segregation and disposal of obsolete and waste material

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 19.1 | The procedures and/or policies for the segregation and safe disposal of obsolete materials shall be developed and implemented to prevent their inadvertent use (e.g., Plant-Based Global Standard trademark) or risk of cross-contamination with materials of animal origin. Obsolete materials may include:   * labels (refers to any preprinted packaging that bears a list of ingredients) * ingredients and work in progress * finished products. |  |  |

20 Plant-based awareness training

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| **Clause** | **Requirements** | **Conforms** | **Comments** |
| 20.1 | The site’s documented training program must include plant-based awareness training.  All relevant personnel, including engineers/maintenance, temporary staff, and contractors, shall have received general plant-based awareness training.  Training shall be conducted at an appropriate pre-determined frequency, at least annually, and must include, where appropriate:   * ingredients, components of ingredients, and processing aids that contain materials of animal origin * traffic patterns of people, equipment and waste * the controls to prevent cross contamination, such as dedicated plant-based production areas, equipment and tools * separation and segregation of product and processes * dedicated uniforms and personal protective equipment, as required * job rotation practices * management of contractors, visitors, and temporary employees. |  |  |