



**Global Standard  
FOOD SAFETY  
ISSUE 9**

**GUIDE TO  
KEY CHANGES**

[brcgs.com](https://www.brcgs.com)

## Copyright and liability

BRCGS<sup>1</sup> publishes information and expresses opinions in good faith, but accepts no liability for any error or omission in any such information or opinion including any information or opinion contained in this publication.

Whilst BRCGS has endeavoured to ensure that the information in this publication is accurate, it shall not be liable for any damages (including without limitation damages for pure economic loss or loss of business or loss of profits or depletion of goodwill or otherwise in each case, whether direct, indirect or consequential), or any claims for consequential compensation whatsoever (howsoever caused) arising in contract, tort (including negligence or breach of statutory duty), misrepresentation, restitution or otherwise, in connection with this publication or any information contained in it, or from any action or decision taken as a result of reading this publication or any such information.

All warranties, conditions and other terms implied by statute or common law are, to the fullest extent permitted by law, excluded.

Nothing excludes or limits the liability of BRCGS for death or personal injury caused by its negligence, for fraud or fraudulent misrepresentation or for any matter which it would be illegal for them to exclude or attempt to exclude liability for.

The Global Standard Food Safety: Guide to Key Changes and the terms of the disclaimer set out above shall be construed in accordance with English law and shall be subject to the non-exclusive jurisdiction of the English Courts.

### Copyright

© BRCGS August 2022

ISBN 978-1-78490-462-3

All rights reserved. No part of this publication may be transmitted or reproduced in any form (including photocopying or storage in any medium by electronic means) without the written permission of the copyright owner. Application for permission should be addressed to the Head of Publishing at BRCGS (contact details below). Full acknowledgement of author and source must be given.

The contents of this publication cannot be reproduced for the purposes of training or any other commercial activity.

No part of this publication may be translated without the written permission of the copyright owner.

**Warning:** Any unauthorised act in relation to a copyright work may result in both a civil claim for damages and criminal prosecution.

For more information about BRCGS, contact:

BRCGS, Second Floor, 7 Harp Lane, London EC3R 6DP

Tel: +44 (0) 20 3931 8150

Email: [publishing@brcgs.com](mailto:publishing@brcgs.com)

Website: [brcgs.com](http://brcgs.com)

Typeset by Williams Lea, London

<sup>1</sup> BRCGS is a trading name of BRC Trading Ltd. BRCGS is part of LGC ASSURE

# Contents

<b>Introduction</b>	<b>4</b>
Background and objectives of Issue 9	4
Summary of key changes to the requirements	4
Changes to the audit protocol	6
<b>Detailed changes to the requirements</b>	<b>7</b>
1 Senior management commitment	8
2 The food safety plan - HACCP	14
3 Food safety and quality management system	22
4 Site standards	37
5 Product control	62
6 Process control	75
7 Personnel	79
8 Production risk zones – high risk, high care and ambient high care	83
9 Requirements for traded products	90

# Introduction

BRCGS published Issue 9 of the Global Standard Food Safety (hereafter referred to as the Standard) in August 2022 and this issue will be used for all audits conducted from 1 February 2023. Certificates issued against Issue 8 remain valid for the duration indicated on the certificate.

This document is intended to introduce Issue 9 and act as a guide for all users to the changes and the reasons for the changes since Issue 8. The document provides a full list of all the changes to the requirements and will be a useful reference for companies needing to update their quality systems in preparation for an audit against Issue 9. There is also an interpretation guideline which provides guidance on all the clauses. These documents are available to all certificated sites on BRCGS Participate as part of the service package or separately via the BRCGS Store.

## Background and objectives of Issue 9

### Development process

A review of the emerging product safety concerns since the publication of Issue 8 identified a number of opportunities for further development. The key objectives identified for the working group was to:

- encourage understanding and further development of product safety culture
- ensure global applicability, maintaining compatibility with the updated Codex General Principles of Food Hygiene, and benchmarking to the Global Food Safety Initiative (GFSI) benchmarking requirements
- expand the audit options to include the use of information and communication technology (ICT)
- update the requirements associated with core product safety activities, such as internal audits, root cause analysis, preventive actions and incident management
- provide greater clarity for sites completing animal primary conversion and producing animal feed.

The detail of the Standard was developed by a working group made up of international stakeholders representing food manufacturers, retailers, food service companies, certification bodies, accreditation bodies and independent technical experts.

The draft requirements were published in December 2021 for industry consultation. All of the comments received on the draft were reviewed before the final version was produced.

## Summary of key changes to the requirements

Issue 8 of the Standard was well received, and we acknowledge that it is a growing standard, with a number of new sites entering the programme on a monthly basis. The requirements of Issue 9 represent an evolution from previous issues, with a continued emphasis on management commitment, a food safety programme (based on hazard analysis and critical control points (HACCP)), and a supporting quality management system. The continuing objective has been to direct the focus of the audit towards the implementation of good manufacturing practices.

The vast majority of the requirements are largely unchanged, receiving only minor edits to the wording to aid clarity. This means that the key changes are easy to identify, enabling sites to concentrate on those areas which need to be addressed for certification to Issue 9.

## Consistency with other BRCGS Standards

We have amended some clauses to reflect the good practice learnt from other BRCGS Standards. For example, the term 'integrity' has been replaced by 'authenticity' to ensure consistent terminology throughout our Standards.

### Product safety culture

The importance of product safety culture has gained renewed understanding since it was first incorporated into the Standard. To this end, and following feedback from the food industry, the working group reviewed the requirement and auditing of food safety culture. This resulted in a major revision of the requirement 1.1.2.

### HACCP/Food Safety Plan

The working group felt that it was appropriate to update the wording for section 2 concerning the HACCP food safety plan to align the requirements with the 2020 revision of the General Principles of Food Hygiene.

### Outsourced processing

An analysis indicated that a significant number of enquiries have related to the definition of outsourced processing. To focus on the issue, the Standard has updated the definition and some of the requirements.

### Equipment

Since the publication of Issue 8 of the Standard, GFSI has published a new benchmark on the hygienic design of food buildings and equipment.

The working group completed a full review of the existing requirements for equipment and this resulted in a major revision of the requirements in section 4.6.

### Animal primary conversion

In May 2021 BRCGS published a position statement on the additional requirements for sites which undertake animal primary conversion. The working group agreed that the content of the position statement should be incorporated into the Standard.

## Additional modules

The following additional modules have been reviewed and updated for Issue 9.

Module 10 – Global G.A.P. Chain of Custody

Module 11 – Meat Supply Chain Assurance.

Module 13 – Meeting FSMA Requirements for Food (Previously known as Module 13: FSMA Preventive controls preparedness)

These modules are voluntary; however, where the company applies for certification to a module, all relevant requirements from the Standard (sections 1–9) must be fulfilled in addition to all the requirements outlined in the module, unless there are any justifiable exceptions (e.g. Section 9: Requirements for traded products only applies to sites that handles traded products).

### Colour-coding of requirements

The audit process gives specific emphasis to the practical implementation of food safety procedures within the factory and general good manufacturing practices. Auditing these areas therefore forms a significant proportion of the audit.

As an aid to this process, the requirements within the Standard have been colour-coded. This colour-coding shows the activities that would usually be audited as part of the assessment of the production areas and facilities, and those that would form part of an audit of records, systems and documentation.

The colour-coding also highlights which requirements may be audited remotely, as part of a blended audit, and which must be audited when the auditor is on site.

The colour-coding is as follows:

Audit of records, systems and documentation		
Audit of production facilities and good manufacturing practice		
Requirements assessed in both		

## Changes to the audit protocol

### Announced audits to include a mandatory unannounced audit every 3 years

Due to the added confidence provided by unannounced audits, the GFSI benchmark 2020 introduced a requirement for all certificated sites to have at least one unannounced audit within every 3-year period, even where the site has opted to be part of an announced audit programme.

Therefore, every 3 years, the audit will be unannounced; the certification body will notify the site and agree which year this will be, to ensure that the site is aware that an unannounced audit will take place in the coming year. However, the actual date of the unannounced audit will not be communicated to the site in advance.

The protocol for an unannounced audit at least once every 3 years was initially introduced into the BRCGS Standards via position statement BRCGS079, but is now fully incorporated into the Standard audit protocol to remove the need for sites to refer to a separate audit protocol.

All other aspects of the announced audit protocol remain unchanged. More details on the announced audit programme can be found in Part III, section 2 of the Standard.

### Blended announced audit programme

BRCGS has introduced a blended announced audit option that utilises the evolving role of information, communication technology (ICT) to incorporate remote assessment into the audit process. With this audit option the audit is split into two separate parts: a remote audit, followed by an on-site audit. The first part (the remote audit) looks predominantly at the documented systems and records using ICT, while the second part (the announced on-site audit) focuses mainly on production, storage and other on-site areas.

The significance of this audit option resides in the flexibility provided to the audit scheduling. More details on the blended announced audit protocol can be found in Part III, section 3 of the Standard.

### Unannounced audits

The unannounced audit protocol has remained largely unchanged from Issue 8 to Issue 9.

### START!

The START! Programme will undergo a full review to ensure that it remains applicable and relevant for smaller sites and those who are developing their product safety and quality systems.

**BRCGS**  
Floor 2  
7 Harp Lane  
London EC3R 6DP

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

To learn more about the BRCGS certification programme please visit  
[brcgs.com](http://brcgs.com)

To learn more about the BRCGS online publication service for  
certificated sites, please visit [brcgsparticipate.com](http://brcgsparticipate.com)

To purchase printed copies or PDFs from the full range of BRCGS  
publications please visit [brcgs.com/store](http://brcgs.com/store)

Part of

