



# BRC Global Standard for Agents and Brokers Issue 1

## Position Statements

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### Document Scope:

During the lifetime of a published Standard the BRC 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 BRC Global Standard for Agents and Brokers Issue 1.

### Change log:

Version no.	Date	Description
2	TBC	Amendment of Position Statement 2: Additional office locations updating the requirements for an audit plan. Addition of: Position Statement 4: Non-applicable clauses Position Statement 5: Amendment to clause 4.1.2



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2. Revised certificate format for the Global Standard for Agents and Brokers
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Appendix 1: Revised certificate template

## 1. Auditing additional locations and office assessments (Audit Protocol Section 5.3)

Companies providing services within the scope of the Standard may have a single office or may have a number of offices based in one or more countries around the world. The scope of certification may include all the offices or only specific offices.

Where a company has multiple office locations, which are included within the scope of the audit, it will be necessary to audit the operations of those individual offices. Where a company has multiple office locations, all operating to a common quality system and where all records are electronic and available these can be reviewed from a single location.

The certification body shall develop an audit programme for the assessment of a multiple-office system which enables the information relating to each individual office to be fully audited and this must provide complete confidence that each individual office complies with the full requirements of the Standard, i.e. the certification body must have full confidence that the same quality system is in use in each office and that it is operating effectively.

It may not be necessary for each individual office location to be physically visited in order to complete the audit but the need for physical audits of additional locations may be required where:

- the central systems do not work effectively during the head office audit or are insufficient to provide complete access to required information
- information supplied by the company is found to be incomplete or inaccurate
- significant issues are identified at an office audit which would necessitate visits to another office to fully demonstrate compliance to a level to achieve certification of that office.

Where the office is not physically visited it is essential that this is justified, and a full audit of the location is completed prior to a certificate being issued. Therefore, it is expected that for each additional office being audited the auditor will:

- access sufficient records and procedures to demonstrate the operation of the systems and the accuracy and completeness of relevant record keeping at that specific office
- complete at least one vertical audit of a product handled or managed through the office
- interview relevant staff. The purpose of this interview is to question staff on specifics relating directly to documents, processes or activities already assessed and to obtain clarity on any points raised while auditing the systems (i.e. it is identical to the type of interview that would be completed during an on-site audit). It is not intended that the whole audit will be completed during this interview, as a substantive amount of the procedures, records and operations will have already been reviewed prior to the interview.

The audit plan for all offices shall be agreed between the certification body and the company. This plan must contain sufficient detail relating to the auditing of each office, so that the minimum time used for each office and the activities that will be covered for each office.

The audit duration for a multiple site audit is expected to be significantly longer than for a single office audit of comparable size and complexity. Each additional location included in the audit scope will therefore increase the audit duration by a minimum of 2 – 3 hours.

Non-conformities raised against the additional locations shall be recorded on the audit report for the head office (or central, physically audited, office) and shall be included within the count of non-conformities contributing to the certification decision. Therefore, all of the office locations within the audit scope will form part of the same certification decision.



A single certificate shall be issued for all of the offices included within the audit scope. (An individual certificate for an office can only be issued where an auditor has physically visited and audited that specific location). In addition to the audit report for the head office (or central, physically audited location), separate audit reports for each additional location will continue to be written and uploaded onto the BRC Directory.

The format of the certificate will comply with the template in appendix 1 of this position statement.

*Issued 9/3/2015*

*Updated September 2016*



## 2. Certificate format for the Global Standard for Agents and Brokers

The format of the certificate for the Global Standard for Agents and Brokers has been amended such that:

- Reference to the services provided by the company being audited is no longer included. Information relating to these services which are contracted to support the agent /broker operations will continue to be recorded in the audit report.
- Additional wording has been added to the bottom of the certificate relating to the use of the BRC Directory and Tell BRC. (This wording has already been communicated to certification bodies in the January 2015 bulletin as it will be a requirement for all certificates issued against a BRC Standard for Agents and Brokers).

Therefore the certificate shall conform to the format shown in Appendix 1 of this position statement. Logos used on certificates (e.g. the BRC and accreditation body logos), shall comply with their respective usage rules. In addition:

- The certificate will detail the scope of the audit. The certificate shall be issued to the company and include the location of the office(s) applicable.
- Where a certificate is issued for a multi-site organisation the addresses of each site within the audit scope shall be included on the certificate.
- The certificate will include the six-digit auditor registration number of the lead auditor.
- The date(s) of audit specified on the certificate shall be the date of the audit relating to the granting of that certificate, irrespective of whether later visits were made to verify corrective action arising from the audit.

Whilst the certificate is issued to the company, it remains the property of the certification body, which controls its ownership, use and display.

*Issued 9/3/2015*

### 3. Product Categories (Standard for Agents and Brokers Appendix 3)

The audit requires some product technical knowledge in order to assess the appropriateness of the agent's/broker's processes for the approval and evaluation of product and service suppliers. Auditors are therefore expected to have product category knowledge and Issue 1 of the Standard identifies 12 product categories (seven for food products and five for packaging). Following discussion on the availability of auditors for all the product categories, the BRC Technical Advisory Committee (TAC) has amended the number of categories as follows:

	Category Number	Product Category	Category Description
Food Products	1	Chilled and frozen food	<ul style="list-style-type: none"> <li>• Raw meat, fish and prepared food</li> <li>• Fruit and vegetables, prepared and fresh</li> <li>• Dairy</li> <li>• Ready-to-eat chilled and frozen products</li> </ul>
	2	Ambient food	<ul style="list-style-type: none"> <li>• Canned and jarred products</li> <li>• Alcoholic and non-alcoholic drinks</li> <li>• Ambient grocery products</li> </ul>
Packaging	3	Packaging materials	<ul style="list-style-type: none"> <li>• Glass</li> <li>• Paper</li> <li>• Metals</li> <li>• Plastics</li> <li>• Wood and other materials</li> </ul>

It is the responsibility of the business to ensure that adequate and accurate information is given to the certification body, detailing the products it handles, to enable the certification body to select an appropriate auditor with the required skills to undertake the audit.

Certification bodies must be able to demonstrate that every auditor has appropriate training and experience for the particular categories for which they are considered competent.

When selecting an auditor for a specific audit, the certification body must ensure that the auditor meets the product category requirements listed above and has product experience as closely aligned to the businesses product range as practical. For example, if a broker deals solely in red meat then the auditor must be approved for category 1 (above) and should have experience of the red meat industry. Where a broker handles products from multiple products within a single category eg multiple chilled products such as red meat, poultry and dairy then the auditor is expected to be approved for category 1 and should have experience of at least one of the product types.

Auditor competence shall be recorded at least at the level of each category as indicated in Appendix 3 of the Standard.

## 4. Non-applicable clauses

The current wording in the Introduction to the Requirements section of the Standard relating to non-applicable clauses states:

### Non-applicable clauses

The requirements section of the Standard is based on good industry practice, such that certificated companies are able to demonstrate to customers their commitment, a structured approach to managing product safety and a controlling influence over the safety, legality and quality of the products covered by their services.

It is recognised, however, that the activities and services provided by brokers and agents or non-manufacturing service providers may vary considerably and that some of the services included within this Standard may not be offered by all companies applying for certification. Such services will be considered to be non-applicable and certification can still be provided on the basis of compliance with the remainder of the applicable requirements.

To ensure consistent understanding and application of the Standard, the sections which may be classified as non-applicable are identified by the background shading of the statement of intent. For example:

**The clauses for statements of intent with no background shading, surrounded by a coloured border as shown, may be non-applicable to some organisations.**

BRC are aware that this restriction is preventing companies that could be certificated from proceeding with audits and the certification process, as the scope of their business does not include all of the activities covered by the Standard. BRC have therefore updated the requirements relating to non-applicable clauses. The above text no longer applies and is replaced with the following:

### Non-applicable clauses

The requirements section of the Standard is based on good industry practice, such that certificated companies are able to demonstrate to customers their commitment, a structured approach to managing product safety and a controlling influence over the safety, legality and quality of the products covered by their services.

It is recognised, however, that the activities and services provided by brokers and agents or non-manufacturing service providers may vary considerably and that some of the services included within this Standard may not be offered by all companies applying for certification. Where individual requirements are considered to be not applicable these will be reviewed by the auditor to verify that the absence of activity does not implicate product safety, legality or integrity. Certification can therefore still be provided on the basis of compliance with the remainder of the applicable requirements.



The final audit report will include comments on any clauses deemed as not applicable.

Examples of clauses that may be not applicable to some companies include:

4.4.4 Analysis critical to safety and legality

4.6 Product design/development

4.7 Product Release

*Issued September 2016*



## 5. Amendment to clause 4.1.2 – Supplier Approval

Since the publication of the Standard for Agents and Brokers, BRC have subsequently published Issue 7 of the Food Standard and it has been drawn to our attention that the requirements related to supplier approval (clause 4.1.2 in Agents & Brokers and 3.5.1.2 in the Food Standard) are not completely aligned. Therefore, in order to bring the Agents and Brokers Standard requirement (clause 4.1.2) in line with the equivalent clause in the Food Standard, clause 4.1.2 is replaced with the following amended text:

Clause	Requirement
4.1.2	<p>The process for the initial and ongoing approval of manufacturers of products shall be based on risk and include:</p> <ul style="list-style-type: none"> <li>• certification of the manufacturing/packing site to the applicable BRC global standards or other Global Food Safety Initiative (GFSI) benchmarked standard</li> <li>• supplier audit with a scope to include product safety, traceability testing, HACCP (Hazard Analysis and Critical Control Point)/hazard and risk management review, and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor.</li> <li>• a manufacturing site questionnaire which has been reviewed and verified by a demonstrably competent person</li> </ul> <p>By exception only, and where a valid risk-based justification is provided, initial and ongoing approval may be based on:</p> <ul style="list-style-type: none"> <li>• legally enforceable warranties from the supplier</li> <li>• a historical trading relationship supported by documented evidence of performance reviews demonstrating satisfactory performance</li> </ul> <p>Where it is a customer requirement that products are supplied by a specific manufacturer and the liability is with that customer, this clause may not be applicable.</p>

*Issued September 2016*



## Appendix 1: Revised Certificate Template

**CERTIFICATION BODY NAME OR LOGO**

Auditor number

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This is to certify that

**COMPANY NAME**  
**AUDIT SITE ADDRESS**

### **Associated offices**

Offices included within certification (this may also be presented as an appendix to the certificate)  
Has been evaluated by *certification body name* (a national accreditation body)  
accredited certification body no. x and found to meet the requirements of

*Global Standard for Agents and Brokers*  
**ISSUE 1: JANUARY 2014**

### **SCOPE**

#### **Product categories**

Date(s) of audit: if an extension to scope include original audit date and visit date

Certificate issue date:

Re-Audit due date: from            to

Certificate expiry date:

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Authorised by

Accreditation  
body logo

Name and full address of certification body

BRC logo

Certificate traceability reference

This certificate remains the property of (name of certification body)

If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, please contact [enquiries@brcglobalstandards.com](mailto:enquiries@brcglobalstandards.com) or call the TELL BRC hotline +44 (0)20 7717 5959.

Visit [www.brcdirectory.com](http://www.brcdirectory.com) to validate certificate authenticity.