BRC GLOBAL STANDARDS

GLOBAL STANDARD
FOOD SAFETY ISSUE 7

FREQUENTLY ASKED QUESTIONS

ISSUE 7

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INTRODUCTION

The frequently asked questions relating to Issue 7 of the Global Standard for Food Safety are detailed below.

BRC Global Standards operate an enquiry service and if you are unable to find an answer to your particular question, then please contact enquiries@brcglobalstandards.com

GENERAL QUESTIONS – BACKGROUND

WHY DID ISSUE 6 NEED CHANGING?

Food safety does not stand still; new risks, legislation and practices to improve food safety are continually emerging so as a matter of principle the Standard needs to be periodically reviewed and updated. The most significant changes in Issue 7 concern:

- encouraging sites to put systems in place to reduce their exposure to fraud
- encouraging greater transparency and traceability in the supply chain
- providing a Standard with the flexibility to include additional voluntary modules that reduce the audit burden
- encouraging adoption of the Standard as a means of improving food safety in small sites and facilities where processes are still in development.

IS A DOCUMENT HIGHLIGHTING THE CHANGES FROM ISSUE 6 TO ISSUE 7 AVAILABLE?

The key changes document is available from the BRC bookshop (www.brcbookshop.com/p/1808/brc-global-standard-for-food-safety-issue-7-guide-to-key-changes-unlocked-pdf-version) and on BRC Participate (www.brcparticipate.com).

WHEN WILL AUDITS AGAINST THE NEW ISSUE OF THE STANDARD BEGIN?

All audits from 1 July 2015 will be carried out against Issue 7 of the Standard.

OUR SITE IS IN THE UNANNOUNCED AUDIT PROGRAMME – WILL WE HAVE AN ISSUE 6 AUDIT OR AN ISSUE 7 AUDIT?

This will depend on when your audit takes place. All audits starting from 1 July 2015 will be carried out against Issue 7 of the Standard. If your audit occurs after this date then it will be an Issue 7 audit. If the audit starts before 1 July then it will be an Issue 6 audit.

For Option 2 (two-part) unannounced audits, it is possible that the first unannounced audit date will occur before 1 July and the second announced audit after this date. In this situation the same rules will apply (i.e. the audit before 1 July will be against Issue 6 of the Standard). If the second audit occurs after 1 July, this will be audited to Issue 7 of the Standard and will include any requirements of Issue 7 that were not covered in the earlier audit. In this situation, the certification body will make its certification decision based on Issue 7 of the Standard.

HOW DO I DOWNLOAD A COPY OF THE STANDARD?

The Standard is freely available to download from the BRC bookshop (www.brcbookshop.com).

You can access all BRC Global Standards, as well as interpretation guidelines, supporting publications and additional resources, quickly and easily via BRC Participate, our online subscription platform.

HOW DO I DOWNLOAD A COPY OF THE GLOBAL MARKETS PROGRAMME?

The Global Markets programme is freely available to download from the BRC bookshop (www.brcbookshop.com).

Other BRC publications can be accessed via BRC Participate, as detailed in the answer to the previous question.

We will add other Global Markets documents, including checklists and translations, as soon as they become available.

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Contact support@brcbookshop.com

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Contact support@brcparticipate.com

WHERE DO I FIND THE DIFFERENT LANGUAGE VERSIONS OF THE STANDARD?

The different language versions can be found on BRC Participate (www.brcparticipate.com) or are available from the BRC bookshop (www.brcbookshop.com). To download or purchase a translation of the Global Standard for Food Safety, click on the English publication and then scroll down to select your preferred language.

WHERE CAN I DOWNLOAD A COPY OF THE SELF-ASSESSMENT DOCUMENT FOR ISSUE 7 OF THE STANDARD?

The document is available in English and can be downloaded from our Global Standards website at www.brcglobalstandards.com/Manufacturers/Food/GuidanceandFAQs.aspx

We will add additional language versions as soon as they are available.

WHAT WOULD YOU EXPECT TO SEE FOR A RISK ASSESSMENT, SINCE THE STANDARD BASES MANY OF ITS REQUIREMENTS ON THIS?

We would expect to see some sort of documentation as evidence of the thought process and conclusions made regarding the risks to products. However, the principles and objectives behind a risk assessment are to ensure that the company has considered the issues pertinent to the requirements and can justify the reasons for its policy or procedures (and therefore respond to the challenge by an auditor). In some instances it would be appropriate to have a detailed document (along the principles of a HACCP plan) showing those considerations; examples of this could be the risk rating for suppliers and the subsequent approval process, or an inclusion in the HACCP plan of the risks to product from physical contamination. However, other requirements (such as the policy concerning where beard snoods must be worn) could be evidenced in other ways – these could range from a documented policy and the reasoning behind it, to the understanding by staff of the need for its implementation. This policy would include considerations of best practice within the industry and be open to challenge by an auditor. The need for a documented risk assessment would be particularly pertinent where you have decided not to adopt procedures for a particular requirement (such as not wearing beard snoods in a particular area).

QUESTIONS RELATING TO THE AUDIT PROTOCOL

AUDIT DURATION

WILL THE AUDIT DURATION CHANGE FOR ISSUE 7 AUDITS?

The time required for Issue 7 audits is expected to be very similar to those for Issue 6 (i.e. typically a total audit time of 2 days).

VOLUNTARY MODULES

WHAT ARE VOLUNTARY MODULES?

The Standard has been designed to enable the addition of voluntary modules to the routine audit. The aim of the voluntary modules is to enable sites to demonstrate compliance with specific sets of requirements in order to meet specific market or customer requirements without the need for an additional audit, thus reducing the number of separate audits at the site.

It is expected that modules will be developed and become available for use throughout the life of Issue 7 of the Standard. A list of available modules will be kept on the BRC Global Standards website (www.brcglobalstandards.com) and the applicable requirements and any specific protocol will be available to download from our bookshop (www.brcbookshop.com) and from BRC Participate (www.brcparticipate.com).

If a site wishes to include a voluntary module (or modules) within the scope of its audit, then it must notify the certification body in advance of the audit.

CAN TRADED (FACTORED) GOODS BE INCLUDED IN THE SCOPE OF THE AUDIT?

Traded goods (sometimes referred to as factored goods) are products which are purchased and sold or distributed by a site, but which do not undergo any process at the audited factory. Traded goods are often products bought in by a company to complement the range of products manufactured at the site, to provide a more comprehensive product range.

Packing or repacking operations are classified as a process and would not be considered as factored goods.

BRC Global Standards have developed and published a Voluntary Module for Traded Goods (see above for details of available modules). The aim of this module is to allow the inclusion of traded goods in the scope of the site's Issue 7 audit without the need for a separate audit to another standard. If a site wishes to include this traded goods module within the scope of its audit, then it must notify the certification body in advance.

EXCLUSIONS FROM SCOPE

HAVE THE RULES FOR EXCLUSION FROM SCOPE CHANGED?

We have deliberately tightened the rules on exclusions from scope. There are a number of reasons for this, including:

- to minimise the potential for a product or activity that is outside the scope to have an adverse effect on products or processes that are in scope
- to ensure that no stakeholder using the report or certificate can misunderstand the scope of the audit
- to protect the reputation of the audit, the BRC Global Standards and the certification body in the event of an out-of-scope product or activity causing a problem at a site.

The Standard states that products can only be excluded if:

- the excluded product(s) can be clearly differentiated from products within scope (i.e. they have a different physical appearance or packaging)

AND

- the product(s) are produced in a physically segregated area of the factory (i.e. they are produced in a physically separate area and not in the same room).

The BRC logo may only be used by sites where there are no exclusions from scope.

NEW FACTORIES

WHEN CAN WE BOOK AN AUDIT FOR OUR NEWLY BUILT FACTORY?

Manufacturing units that are newly built or 'commissioned' must ensure that their systems and procedures are compliant before the initial audit is undertaken. Whilst it is at the discretion of the company when to invite a certification body to carry out an audit, it must be able to demonstrate that its systems and processes are well established, compliant and monitored. It is therefore unlikely that full compliance could be satisfactorily demonstrated within the first 3 months of operation. A company may wish to consider a pre-assessment towards the end of this 3-month period.

NON-CONFORMITIES

OUR SITE HAS HAD AN AUDIT AND WE ARE NOT HAPPY WITH THE NON-CONFORMITIES IDENTIFIED OR THE GRADE AWARDED – WHAT CAN WE DO?

The company has the right to appeal against the certification decision made by the certification body, and this should be made in writing to the certification body within 7 days of the decision. The certification body shall give a full written response within 30 days following a full and thorough investigation. The company also has the option to contact BRC Global Standards if resolution cannot be attained by the two parties.

QUESTIONS RELATING TO SPECIFIC REQUIREMENTS OF THE STANDARD

1 SENIOR MANAGEMENT COMMITMENT

CLAUSE 1.1.7: WHERE CAN I FIND A LIST OF THE POSITION STATEMENTS?

Position statements can be found on the BRC Global Standards website (www.brcglobalstandards.com/Manufacturers/Food/FoodIssue7.aspx) and on our online subscription service, BRC Participate (www.brcparticipate.com). Any new position statements will also be communicated via the quarterly BRC Global Standards newsletter. This newsletter is sent to all certificated companies and certification bodies. (If you do not receive the newsletter but would like to do so, please check your junk mail as some email filters prevent delivery. Alternatively, sign up to receive the newsletter at www.brcglobalstandards.com/Home/NewsletterSignup.aspx).

CLAUSE 1.1.7: DOES THE FREE PDF COPY OF THE STANDARD COMPLY WITH THE REQUIREMENTS OF CLAUSE 1.1.7?

The site is required to have an official copy of the Standard available in either paper or electronic form. This can be a copy of the free PDF version, a purchased copy of the Standard, or by subscription to BRC Participate (www.brcparticipate.com).

CLAUSE 1.1.9: WHO ARE THE 'MOST SENIOR' PRODUCTION OR OPERATIONS MANAGERS ON SITE TO ATTEND MEETINGS?

The objective behind this requirement is to ensure that the conclusions of the audit and any actions required to correct non-conformities are effectively understood, agreed and carried out with the proper authority. Whilst it may be the case that the most senior personnel are absent on the day of the audit, there will always be someone on site who will be responsible for the daily running of the site.

2 THE FOOD SAFETY PLAN – HACCP

CLAUSE 2.1.1: HOW MANY PEOPLE SHOULD MAKE UP THE HACCP FOOD SAFETY TEAM AND WHAT TRAINING DO THEY REQUIRE?

The number of people on the HACCP food safety team is dependent on the size and structure of the company, as the team should include representatives of each department who have responsibility for the operation of the Standard.

It should be noted that one person does not constitute a 'team'.

Team members should have appropriate training. This may be achieved through external, industry-recognised training specific to HACCP, or a good-quality internal course. At the audit, the competency and understanding of the HACCP team will be assessed, as well as the quality of the resultant HACCP plan.

If the HACCP plan has been prepared with the help of an external consultant, internal staff are still obliged to be fully conversant with the plan, and the principles and practices associated with it. Records also need to demonstrate the training of the external consultant in HACCP principles.

CLAUSE 2.4.1: WHAT IS MEANT BY THE TERM 'KNOWN ALTERNATIVE USE'?

Where there is a known use of a product that is different from that intended by the manufacturer, including the potential for a customer or consumer to misuse or mistreat the product, this information should be included in the HACCP assessment, so that any implications can be considered as part of the hazard analysis.

3 FOOD SAFETY AND QUALITY MANAGEMENT SYSTEM

CLAUSE 3.1.1: DO ALL PROCEDURES HAVE TO BE DOCUMENTED?

'Procedures' are referenced frequently within the Standard. Where the Standard references the requirement for a procedure, it must be documented (refer to the glossary in the Standard for a definition of 'procedure').

CLAUSE 3.4.1: ISSUE 7 OF THE STANDARD REQUIRES 'A SCHEDULED PROGRAMME OF INTERNAL AUDITS THROUGHOUT THE YEAR'. HOW IS THIS DIFFERENT FROM THE REQUIREMENTS OF ISSUE 6?

The site must have a schedule or programme of internal audits to ensure that individual sections of the process, documentation or production are scheduled for different, predefined audit dates throughout the year.

A once-a-year check against all the Standard's requirements may be of value as a gap analysis when preparing for an audit, but is insufficient to cover the full requirements of an internal audit programme as it will not provide the depth of assessment or level of confidence required.

Where a site is part of a multi-site company that conducts annual corporate food safety audits, it is acceptable for this annual audit to be incorporated into the internal audit schedule. However, it is expected that additional internal audits looking at specific parts of the food safety and quality manual, and compliance with the Standard, will be scheduled throughout the rest of the year. The frequency of these audits should be based on risk.

CLAUSE 3.4.2: WHAT TRAINING DO INTERNAL AUDITORS HAVE TO COMPLETE AND WHAT DOES 'INDEPENDENT' MEAN?

Internal auditors should be able to show (via training records) that they have received formal training via either attendance on an external course or training within the company. Training should cover the planning and scheduling of internal audits, preparing reports, the correct use of audit techniques (e.g. process auditing, audit trails and interviewing) and following up of audit findings.

The objective behind the requirement for auditors to be independent (i.e. to not audit their own work) is to ensure that the auditor is rigorous and thorough and not influenced by the work which may be needed to make corrections and improvements.

The use of an external consultant is acceptable, providing that the internal audit programme is scheduled throughout the year and not in a single block of activity.

CLAUSE 3.5.1.2: A RAW MATERIAL SUPPLIER TO OUR SITE IS INDEPENDENTLY CERTIFICATED BUT NOT TO A GFSI-BENCHMARKED STANDARD. IS THIS ACCEPTABLE?

This may be acceptable as an alternative to the site completing its own audit of the site providing that:

- the scope of the audit meets the requirements of the Standard (i.e. as a minimum that it includes an assessment of product safety, traceability, HACCP review and good manufacturing practices)
- the site has a copy of the full audit report (not just a certificate)
- the site can demonstrate the competence of the auditor.

CLAUSE 3.5.1.3: OUR SITE PURCHASES RAW MATERIALS FROM AN AGENT WHO IS CERTIFICATED. DO WE STILL HAVE TO OBTAIN DETAILS OF THE LAST MANUFACTURER OR PACKER?

If the agent or broker is certificated to the Global Standard for Agents and Brokers, then the site simply needs to know the identity of the manufacturer, packer or processor of the material.

If the agent or broker is not certificated to the Global Standard for Agents and Brokers, then the site will need to know the identity of the manufacturer, packer or processor of the material **and** receive sufficient information to complete a supplier approval in accordance with clause 3.5.1.2.

CLAUSE 3.5.1.3: IT WILL BE VERY DIFFICULT TO IMPLEMENT CLAUSE 3.5.1.3 PRIOR TO 1 JULY 2015. WILL THERE BE A TRANSITION PERIOD?

BRC Global Standards have published a position statement relating to clause 3.5.1.3:

For Issue 7 audits from 1 July 2015 to the end of June 2016, the site must demonstrate that, as a minimum, all agents or brokers supplying raw materials have been contacted and requested to provide the details of the manufacturer or manufacturers and the necessary information to allow supplier approval.

After 1 July 2016 sites must fully comply with the requirement as stated in the Standard.

The full position statement can be downloaded from www.brcglobalstandards.com/Manufacturers/Food/FoodIssue7.aspx

CLAUSE 3.5.1.3: WHAT ARE BULK COMMODITY PRODUCTS? WHERE IS THE POINT OF CONSOLIDATION?

Bulk commodities are raw materials such as grain that are stored and transported in large quantities as a result of bringing together product from a number of farms to form a single lot or batch.

The point of consolidation is the point where the individual farms' materials are combined and is therefore the first step for the raw materials after leaving the farm. It may be a broker, a co-operative or central depot that arranges the consolidation.

CLAUSE 3.5.4.1: THE STANDARD REQUIRES OUTSOURCED PROCESSES TO BE 'DECLARED TO THE BRAND OWNER' – IS THIS ONLY FOR RETAIL-BRANDED PRODUCTS OR FOR PARTICULAR MARKETS (E.G. THE UK)?

No, this requirement applies to any product manufactured on behalf of a customer. The Standard isn't applied differently for different markets or different customers.

CLAUSE 3.9.2: HOW ACCURATE DOES THE QUANTITY CHECK/MASS BALANCE ON TRACEABILITY NEED TO BE?

It is unlikely that the mass balance check will be able to account for all materials to an accuracy of 100%; however, the company needs to be able to justify any discrepancies and demonstrate that it understands the nature of the variance (e.g. through dehydration of fresh ingredients, typical wastage on equipment, or portion variances).

CLAUSE 3.9.2: HOW MANY TRACEABILITY TESTS ARE REQUIRED EACH YEAR?

The Standard requires the site to test traceability 'across the range of products' each year. Where the traceability for all products manufactured by the site is the same or similar, then a minimum of one traceability test a year must be completed. However, if there are significant differences or specific traceability challenges relating to one product or a group of products, this may necessitate additional tests specifically related to that product or group of products.

In addition, where the site makes a product claim, the requirements of clause 5.4.4 apply (i.e. traceability tests should occur at a frequency to meet any particular scheme requirements or at least every 6 months in the absence of a scheme-specific requirement).

CLAUSE 3.9.3: HOW DO WE ENSURE THAT OUR RAW MATERIAL SUPPLIERS HAVE EFFECTIVE TRACEABILITY SYSTEMS?

Sites must ensure that their raw material suppliers (excluding packaging suppliers) have suitable traceability systems in operation. This assurance can be obtained from certification, auditing or by directly testing traceability. Examples include:

- Where the raw material supplier is certificated to a GFSI-benchmarked standard, assessment of traceability systems will form part of these audits and therefore no additional action is required to comply with the requirements of this clause. However, a communication mechanism should be in place, such that if the raw material supplier were no longer to be certificated, the site would be made aware of this change.
- If the raw material supplier is audited by the site and the audit includes an assessment of the traceability systems, this would comply with the requirement of clause 3.9.3 as traceability would have been assessed.
- If supplier approval is based solely on a questionnaire with no additional testing of the traceability system, additional traceability verification is required unless the raw material is a primary agricultural product purchased directly from a farm or fishery, where additional testing of the traceability system is not mandatory. This additional verification could include, for example:
  - a test of the raw material supplier's traceability system. For example, as part of the site's traceability test (refer to clause 3.9.2), a relevant ingredient is highlighted. The ingredient and batch details for the material are forwarded to the supplier to enable them to complete the traceability test for the specific batch of raw material and forward the relevant records back to the site.
  - a worked example from the raw material supplier, which clearly shows how the traceability works.
  - a detailed description of the traceability system, provided by the raw material supplier.

CLAUSE 3.9.3: HOW SOON MUST VERIFICATION OF OUR RAW MATERIAL SUPPLIER'S TRACEABILITY SYSTEMS BE COMPLETED?

The Standard expects verification of a raw material supplier's traceability systems to occur over a 3-year period, in line with the minimum 3-year re-issue of supplier approval questionnaires. It therefore follows that, as a guide, all supplier traceability systems must be completed within a 3-year cycle. Consequently, you should be able to demonstrate verification of the traceability system for at least a third of the suppliers in Year 1, two-thirds by Year 2 and all suppliers by Year 3.

CLAUSE 3.10.2: WOULD WE BE EXPECTED TO DO ROOT CAUSE ANALYSIS FOR COMPLAINTS THAT WERE CAUSED BY CUSTOMER ABUSE?

Where there is a serious complaint, a significant increase in a complaint or a significant trend, then a root cause analysis should be undertaken to see if there is an issue (e.g. lack of clarity in the on-pack instructions which may be leading to customer abuse). An improvement based on the analysis may reduce complaints.

4 SITE STANDARDS

CLAUSE 4.2.3: DO ALL EXTERNAL INTAKE PIPES HAVE TO BE LOCKED?

We would expect the intake pipes to be locked. This can be achieved by individual locks for each intake or, where there are several intake pipes located close together, a larger cover (e.g. a box) over several intakes would be acceptable, providing it is locked.

CLAUSE 4.3.1: OUR SITE PACKS PRODUCTS PREPARED OR MANUFACTURED AT OTHER SITES. DO WE NEED TO FOLLOW THE HIGH-RISK OR HIGH-CARE REQUIREMENTS IN THE STANDARD?

The principle of the production risk zones in the Standard is to ensure that the environmental conditions and controls in open product areas are appropriate for the products being handled. Therefore, the expectations for factory hygiene, finish of buildings, equipment, protective clothing and staff hygiene should reflect the potential risks to the product.

Where a product requires high-risk or high-care production zones during its manufacture and initial packing, equivalent controls are expected for any subsequent handling or re-packing operation where the product is open to the factory environment (i.e. the re-packing site is expected to follow the high-risk or high-care requirements appropriate for the product).

CLAUSE 4.3.7: OUR SITE PROCESSES TREE NUTS. WE HAVE TRIED TO USE THE FLOW DIAGRAM IN APPENDIX 2 OF THE STANDARD BUT ARE UNSURE WHETHER WE NEED TO APPLY THE AMBIENT HIGH-CARE REQUIREMENTS IN THE STANDARD.

The principle of the production risk zones in the Standard is to ensure that the environmental conditions and controls in open product areas are appropriate for the products being handled. In the case of ambient high care, the primary concern is to prevent the re-contamination of the product after the process step where pathogens are removed or reduced to acceptable levels.

The flow diagrams in Appendix 2 of the Standard provide some useful examples of the types of product that need to be considered and the rationale for allocating certain products to specific production risk zones. However, good practice is to compare the specific product details with the full definitions of the production risk zones given in Appendix 2.

For example, raw tree nuts that are sold in-shell (i.e. those applicable to product category 5) could be prepared in low-risk production zones as there is no production step to reduce the level of pathogens, whereas processed nuts (e.g. roasted or pasteurised) applicable to product category 17 would require ambient high care because:

- scientific literature shows that the raw material is prone to contamination
- there is a processing step which removes or reduces pathogen levels
- the finished product is stored at ambient temperatures
- the finished product is ready to eat
- the finished product is such that a very low level of contamination with a vegetative pathogen (e.g. *Salmonella* species) could cause food poisoning due to the fat content of the nut.

It should be noted that the Standard includes only two clauses relating to specific requirements for ambient high care (clauses 4.3.1 and 4.3.7). Clauses that refer to either high risk or high care (without reference to ambient products) are not applicable to ambient high care.

The guideline, 'Understanding high risk, high care and ambient high care', can be downloaded from the BRC bookshop website (www.brcbookshop.com) and is available on our subscription site, BRC Participate (www.brcparticipate.com).

CLAUSE 4.5.1: CAN A COMPANY RELY ON THE CHEMICAL ANALYSIS PROVIDED BY THE WATER AUTHORITY OR DOES IT HAVE TO SUB-CONTRACT THE CHEMICAL ANALYSIS TO AN ACCREDITED LABORATORY?

The type of chemical checks a site completes should be based on a risk assessment. For instance, if the water is supplied by a water authority, an analysis from the authority would suffice unless there are other risks identified in the delivery system (e.g. lead pipes).

Where water is extracted from bore holes (wells) and/or sites have on-site treatment facilities, then additional checks will be required to ensure that the water is not contaminated either at the bore hole or during treatment.

CLAUSE 4.6.2: THE STANDARD REQUIRES EQUIPMENT TO BE SUITABLE FOR FOOD CONTACT WHERE APPROPRIATE AND TO MEET LEGAL REQUIREMENTS, BUT WE CAN'T OBTAIN A CERTIFICATE OF CONFORMITY FOR MACHINERY WE'VE HAD ON SITE FOR YEARS. WHAT CAN WE DO?

The requirement is designed to ensure that manufacturers are complying with relevant legislation (e.g. the EU Materials and Articles Intended to Come into Contact with Food Regulations 2012) and that the materials do not constitute a hazard to food.

General principles should be to use approved suppliers of products specifically designed for food use. All new food-contact equipment should be purchased with a certificate of conformity or specification detailing its suitability for food use; this may also be confirmed by a symbol or label on the product. Where this evidence is not available, then a risk assessment should be carried out to justify the equipment's use and determine that it is not a food safety risk. The risk assessment should consider factors such as:

- the nature of the food-contact surface material and its known characteristics (e.g. stainless steel is known to be a food grade material)
- the length of contact time with the food
- the nature of the food and its potential for contamination (e.g. fatty foods may be more at risk from migration of contaminants from a plastic container).

Further clarification should be sought as required (e.g. from equipment manufacturer) or by completing migration tests.

CLAUSE 4.8.4: ARE BOOT-WASH FACILITIES ACCEPTABLE AT THE ENTRANCE TO HIGH-RISK AREAS?

The site needs a system to control footwear effectively. This may include:

- the use of clean footwear to be worn only in the high-risk area and the provision of effective measures for changing into such footwear
- by exception, the use of boot-wash facilities at the entrance to the high-risk area. This will be acceptable where such facilities demonstrably provide an effective control. The site must have undertaken a risk assessment to identify the suitability of the boot-wash facilities and the controls to manage the effective sanitation of footwear.

For such controls to be effective they would be expected to include the following:

- The potential for cross-contamination of boots prior to boot washing must be considered. Permitted areas where footwear can be worn prior to entry to a high-risk area must be clearly defined (e.g. the same footwear must not be worn outside the facility or in low-risk processing areas).
- The boot-wash equipment must be suitably designed, well maintained and demonstrably effective in cleaning and sanitising the footwear.
- The minimum cleaning time and concentrations of detergent and sanitiser used must be determined, monitored and controlled to ensure effective cleaning of footwear.
- A cleaning schedule (i.e. a schedule for the cleaning of the boot-wash facility and equipment) should be in place to ensure that the boot wash does not become a source or vector of microbiological contamination.
- Records must be maintained of detergent/sanitiser checks and of the effectiveness of the boot-wash facilities.

Regardless of the method of footwear control, the site must ensure that:

- the footwear controls are validated by microbiological monitoring of the factory environment (e.g. the footwear, floors and drains in the high-risk area) to demonstrate the absence of pathogens such as *Listeria* species
- the footwear is company-issued and of a design that is easily cleaned (i.e. smooth upper surfaces, cleats on soles that are sufficiently spaced so as not to trap dirt which may not be easily removed by boot-wash equipment).

CLAUSE 4.10.3.2: THIS REQUESTS 'A BELT STOP SYSTEM WITH AN ALARM WHERE THE PRODUCT CANNOT BE AUTOMATICALLY REJECTED (E.G. FOR VERY LARGE PACKS)'. ARE THERE OTHER INSTANCES WHERE BELT STOP SYSTEMS WOULD BE ACCEPTABLE?

Other examples could include delicate products where the use of a belt stop system is necessary to prevent damage to the finished product (e.g. quiches, freshly topped decorated pies, decorated celebration cakes, chocolate gateaux etc.).

CLAUSE 4.10.3.4: WHAT IS MEANT BY 'CHECKS OF FAILSAFE SYSTEMS'?

Many modern designs of metal detector (and other foreign-body detection systems such as X-rays) have failsafe systems. These are systems that monitor their own functions and raise an alarm (usually audible) if something stops working. For example, if the product rejection system is powered by compressed air and the air supply fails, this will sound the alarm immediately allowing staff to investigate the fault, rather than waiting until the next metal detector check finds there is a problem. Where these systems exist, it is important to run occasional checks to make sure that the failsafe system itself is operating (e.g. that the alarm will sound).

The Standard does **not** expect sites to purchase new metal detection equipment if there is no failsafe system on their current equipment.

CLAUSE 4.11.1: WHAT IS THE PURPOSE OF AUDITORS OPENING EQUIPMENT TO INSPECT CLEANING?

To ensure that the standards of cleaning are properly challenged, some equipment will be opened (e.g. by removing panels or dismantling) to check that the cleaning is more than superficial. Sites should consider any necessary arrangements that may need to be made (e.g. for engineers to be present to open equipment).

Production lines that are running will **not** be stopped for inspection. This aspect of the audit will be limited to lines or equipment that are not in production at the time of the factory tour, or the inspection of equipment will be made outside of production periods.

5 PRODUCT CONTROL

CLAUSE 5.4.2: IS THERE ANY GUIDANCE ON HOW TO CONDUCT A VULNERABILITY ASSESSMENT?

The BRC guideline 'Understanding Vulnerability Assessment' explains the steps to be completed. A copy is available on BRC Participate (www.brcparticipate.com) or available for purchase from the BRC bookshop (www.brcbookshop.com).

We also have a webinar covering this subject which is available from the same websites as the guideline.

CLAUSE 5.4.2: DO I NEED TO COMPLETE A FULL SUPPLY CHAIN MAP AS PART OF THE VULNERABILITY ASSESSMENT?

The Standard is not asking for full supply chain mapping or traceability.

The Standard does expect sites to assess the potential risks of adulteration or fraud presented by ingredients used in the production process. For some high-risk ingredients this may require a level of understanding of the supply chain to fully understand the risk levels.

CLAUSE 5.4.2: CAN OUR SUPPLIER'S VULNERABILITY ASSESSMENT BE USED AS PART OF OUR SITE'S VULNERABILITY ASSESSMENT?

If your supplier has a vulnerability assessment (i.e. they have been certificated to the Global Standard for Food Safety Issue 7) then their vulnerability assessment is likely to be extremely useful as part of your vulnerability assessment.

There is no requirement to duplicate the activity they have already completed in their vulnerability assessment.

You should consider whether there are any extra items you need to consider (e.g. are there any vulnerabilities between the certificated raw material supplier and your site, such as a prolonged period of transport or storage?).

CLAUSE 5.4.4: IS IT NECESSARY TO CARRY OUT A MASS BALANCE TEST ON EVERY PRODUCT WHERE A CLAIM IS MADE?

The objective of the mass balance traceability test is to:

- demonstrate that sufficiently detailed records are maintained to allow an accurate mass balance test to be carried out at any time with any particular process
- check that errors/mixing of products has not occurred (i.e. the claim is valid).

The test must be carried out at least once every 6 months, unless more frequent checks are required by a particular scheme associated with the claim. The Standard does not expect every product with a claim to be tested every 6 months. However, where applicable products are made using very different processes, it may be necessary to check more regularly to ensure that each production process is controlled.

The test should as a minimum take a batch of incoming raw material to which the claim relates (e.g. Aberdeen Angus beef) and identify where the entire batch was used – this may include wastage and remaining stock if appropriate. The test should be able to account for the use of the entire batch of materials.

6 PROCESS CONTROL

No questions in this section.

7 PERSONNEL

CLAUSE 7.2.1: IS THE WEARING OF WEDDING BANDS INCLUDING 'RHUKHI' FRIENDSHIP BANDS (HINDU/SIKH) ACCEPTABLE?

Where such jewellery cannot be effectively cleaned or may present a risk of foreign-body contamination, it must either be removed or covered.

CLAUSE 7.4.4: WHAT IS AN ACCEPTABLE CERTIFICATION FOR LAUNDRIES?

There is a range of certification standards for laundries operating in different parts of the world.

A guideline to good practice in laundries will be published in 2015.

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