Document Scope

Where clarification of interpretation of a requirement of a BRC Global Standard or its protocol is necessary this will be published on the BRC website www.brcglobalstandards.com as a position statement and such statements are mandatory in their use from the date specified for implementation or the date of publication on the BRC website, where no date is specified.

Change log

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Clause 4.2.3

The following position statement has been agreed to elaborate on the interpretation of clause 4.2.3 “External storage tanks, silos and any intake pipes with an external opening shall be locked”.

Position statement

In circumstances where it is not practical to lock all external openings of tanks, for example wineries with extensive external storage tank farms, alternative security arrangements will be accepted. Security arrangements shall be based on documented risk assessment including specific reference to the area where tanks/silos or external opening intake pipes are located. As a guide this may include additional security fencing with a locked gate around the tank farm, a security controlled perimeter and or use of surveillance cameras and lighting. The controls must minimise the risk of access for malicious contamination and ensure that any deliberate contamination is detected.

Effective date 1.12.2015

Background

4.2 SECURITY

| Clause 4.2.3                                                                 | Security systems shall ensure that products are protected from theft or malicious contamination while under the control of the site. |

External storage tanks, silos and any intake pipes with an external opening shall be locked.

The clause is part of the security requirement and is intended to prevent the risk of malicious contamination of product during storage particularly from intruders. Issues have arisen where sites which have very large numbers of external storage tanks e.g. wineries have enhanced security arrangements to prevent access to the tank farms but do not lock every opening on each tank.
Phased introduction of clause 3.5.1.3 (issue 7)

The BRC Technical Advisory Committee have decided to continue to have a phased introduction of the new requirement 3.5.1.3 to allow sites the time to fully comply.

| 3.5.1.3 | Where raw materials are purchased from agents or brokers, the site shall know the identity of the last manufacturer or packer, or for bulk commodity products the consolidation place of the raw material. Information to enable the approval of the manufacturer, packer or consolidator, as in clause 3.5.1.2, shall be obtained from the agent/broker or directly from the supplier, unless the agent/broker is themselves certificated to the BRC Global Standard for Agents and Brokers. |

Audits against issue 7 from 1st July 2015 to End June 2016

The site shall 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 of the raw material supplied and the necessary information to allow supplier approval according to the sites risk assessment.

Audits undertaken from the 1st July 2016 to End June 2017

This clause shall be audited as part of the BRC audit in the 2nd year of the BRC Global Standards i.e. audits from 1st July 2016. Where sites are non-compliant the non-conformities shall be graded as follows.

Major Non-conformity

Where the site does not know the manufacturer of a raw material and/or information to allow approval of a raw material manufacturer for one or more raw materials supplied by Agents/ Brokers AND there is no documentary evidence to show that they have attempted to obtain the information.

Minor Non-conformity

Where the site does not know the manufacturer of a raw material and/or information to allow approval of a raw material manufacturer for one or more raw material supplied by Agents/ Brokers BUT evidence is available that the Agents/Brokers have been asked for the information.

Corrective action required to enable certification

As a minimum evidence shall be provided to demonstrate that Agents/ Brokers have been
re contacted following the audit and information requested to satisfy the requirement. An action plan to achieve full compliance within 1 year shall be submitted including any provision to resource raw materials where Agents /Brokers refuse to provide the information.

Full compliance i.e. obtaining the missing information will not be required for certification.

**Grading:** The non-conformance shall be included in the calculation of the site grade.
BRC/IFS unannounced audits

A number of sites particularly in Europe have combined audits against the BRC and IFS Standards. The new IFS unannounced audit protocol allows sites to apply for an unannounced audit up to 16 weeks before the audit due date whereas the BRC protocol requires sites to notify their certification body within 3 months of their previous audit date.

In order to prevent the need for sites to face the cost of having 2 separate audits the BRC will allow sites with combined BRC/IFS audits undertaking their 1\textsuperscript{st} unannounced audit to notify their certification body up to 16 weeks before the normal audit due date. The subsequent unannounced audits must be confirmed with the certification body within 3 months of the audit due date in accordance with the BRC audit protocol.

Please note that all BRC unannounced audits must start before the audit due date, even when combined with an IFS audit.