

# Global Standard Food Safety, Issue 9

## F931: Guideline for designing certification scope

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Document Scope: The purpose of the guideline is to outline the design of an audit and resulting certification scope in various scenarios.

Version no.	Date	Description
1	08/07/2024	First version for Issue 9.
2	22/07/2025	<p>Section 2: Addition of additional processing sites.</p> <p>Section 2.1: Updated with expectation when changing site address</p> <p>Section 3: Updated to include multiple legal entities on one site.</p> <p>Section 6: Clarification on activities that are out of the scope of the Standard.</p> <p>Section 8:</p> <ul style="list-style-type: none"> <li>• Addition of section 8 Wording of scope, originally in F910, with minor clarifications and additions</li> <li>• Addition of examples of how to build after a scope in Section 8</li> <li>• Additional minor alterations for clarity throughout document.</li> </ul>

It is important that the scope of certification is agreed when arranging the audit and clearly documented without any ambiguity on the resultant certificate. The following provides guidance of the acceptability of processes that can be included and excluded from scope and the general principles for descriptions.

The certification of products must include an audit of the entire process from raw material to end-product dispatch. It is not possible to exclude any part of the process undertaken at the site or any of the sections 1-8 (unless clauses are not applicable) of the BRCGS Global Standard Food Safety (the Standard).

The same scope wording must be used on the certificate and on the audit report.

1. Site name

Certification is site specific, and the certificate should therefore state the name and address of the manufacturing facility. Generally, this will be under the company name of one legal entity. As an exception, where the site requests this, **more than one company or associated brand name** may be listed on the certificate. There shall be the 'main' nominated name (which will be the BRCGS Directory reference) with reference to another. Reference to any other names or brands names shall not be misleading. The company name listed on the audit report and the site allocation on BRCGS Directory should be consistent. Certification bodies can list an additional name within the BRCGS Directory with identification under the 'trading as' field.

For example: *Global Findings Company Ltd also trading as Global Brands.*

Image 1- BRCGS Directory create site view

The screenshot shows the 'Create Site' form in the BRCGS Directory. On the left is an orange sidebar with the BRCGS logo and a list of navigation items: Audits, Auditors, Companies, Recalls, Certification Bodies, Users, Reports, Notifications, Analytics, and Administration. The main form area has a 'Details' section with the following fields: 'Site name' (required, with a calendar icon), 'Trading As name (optional)', 'Select company' (a dropdown menu), 'Address line 1' (required), 'Address line 2', 'Address line 3', 'City' (required), and 'County'. At the top of the form area, there are links for '< Back', 'Create Site', and 'Pirm'.

Where the audit is arranged, e.g. paid for by a **'trader'**, the trader is likely to be specified as the 'audit owner' on the BRCGS Directory and therefore could control the sharing and distribution of the audit report and certificate. However, the certificate (and therefore the

report) must specify the name of the manufacturing company and contain the address of the manufacturing facility.

In all the above examples the relationships will always be described within the company profile in the audit report.

### 1.1 Changes in site name/ownership

Where the site changes its company name or ownership, the certification body shall assess the impact on the current certification. They shall receive sufficient information from the site to determine the extent of the changes.

Where the organisation remains the same, e.g. no management changes, quality system or process changes, and there is confidence in the ongoing compliance of the Standard, the certificate may be reissued by the Certification Body in the new name while retaining the site code and the BRCGS Directory record updated accordingly.

Care shall be taken by the certification body where company's cease to trade for a period, are taken into administration or liquidated. The impact on the current certification shall be carefully assessed to conclude that certification can continue or not. No concessions for late reaudit shall be granted in these cases.

## 2. Site address including additional locations

Certification is site specific, and the certificate should therefore state the name and address of the manufacturing facility.

Where the audit includes a **head office**, this shall conform to the rules set out within the Standard Appendix 4 and the scope shall include reference to those different addresses:

**For example:** 'Baking of sliced fresh bread incorporating head office audit at Office A, B street, Italy'

The Standard requires that any **additional sites** as defined in 1.6.3 (Part III) of the Standard shall be included on the certificate:

**For example:** 'The manufacture (pasteurisation, acidity generation) of cheese at Cheddar Industrial Estate, Wensleydale and maturation at Camembert Road, Ripon.'

In addition, **off-site storage facilities** as defined in 1.6.5 (Part III) of the Standard shall be included in the audit and therefore included on the certificate:

**For example:** 'Baking of sliced fresh bread including offsite storage facility at Block Y, X Road, Devon'

Where these offsite storage facilities are not included in the audit they shall be specified as an exclusion:

**For example:** 'Exclusion: offsite storage facility at Block Y, X Road, Devon'

In all the above examples all sites must be visited as part of the same audit schedule and the relationships will be described within the company profile in the audit report.

## 2.1 Changes in site address

As certification is site specific, once a site moves to new premises, the current certificate is no longer valid and shall be withdrawn. The site will require a full reaudit at their new premises which will 'restart' the certification cycle.

Any site changing address must speak to their Certification Body prior to the move to discuss and agree the process.

## 3. Separate certification of production units on the same site

Sometimes, multiple certifications may be required for different production units at a single postal address. These certificates can either belong to one legal entity or to separate entities. This will be considered exceptional, but allowable where the separate areas meet the rules allowing exclusion from a whole site audit – as a minimum:

- The production unit is physically segregated (the corresponding name will be specified on the certificate e.g. 'unit A').
- The production unit produces a different product from that produced on the rest of the site.
- The scope of the audit shall include the whole production process of a specified product. This shall be verified by the auditor during the site audit.
- The site supplies the specified (finished) product to external customers.

The audits of the production units shall include all the associated processes common to all units, e.g. storage areas, raw material intake and management functions.

The company description within the audit report shall clearly explain the relationship between certificated production units and confirm that all the above requirements are met.

## 4. Inclusion of products in certificated scope not in production at the time of the audit

The audit shall include all applicable requirements within the Standard and all production processes undertaken for the products included within the scope at the site seeking certification.

The audit report specifically requests details of the 'products in production at time of audit'. The products produced will be different at any time, however, will fall into the process types covered by the HACCP plans and the product safety rationale specified within the audit report. The auditor shall investigate and see sufficient objective evidence to confirm compliance with requirements for the products specified within the scope. Where seasonality prevents all products being viewed at the time of the audit, compliance **may** be able to be confirmed through review of historical documented control records.

For example, where a scope of 'Packing of apples and oranges' is required but only apples are being packed at the time of the audit, an assessment needs to be made regarding the significant difference of the process. It is unlikely that the process for packing oranges is

significantly different and historical process records for orange packing could be verified to enable this product to be included within scope.

Wherever possible the audit date shall be selected to include the higher risk or more complex production processes. For example, where a winery is producing and packing in both bottles and bag-in-box the date shall be organised such that the bottling operation is running at the time of the audit.

Where the processes are significantly different and there are different product risks, it would also be expected that both products are audited. For example, where a cannery produces both canned, high acid products such as tomatoes and low acid products such as potatoes, the critical points of the canning process will differ and therefore both products would need to be audited.

There will be exceptional examples where all processes for a product cannot be audited at one time but may be included in scope without a physical audit because the risk to certification is low. In these circumstances the higher risk process shall be audited, and other processes reviewed via historical records. An example is the vinification and bottling of wine – the audit should be scheduled to view the higher risk process of bottling, with review of records to confirm compliance of the vinification process.

Where audits are carried out unannounced the information provided at registration for the unannounced audit programme should enable site audits to be planned to meet the rules above.

It shall be noted that additional modules have their own protocols which shall be adhered to.

## 5. Certification of additional modules

BRCGS have designed a concept of 'bolt on modules' which may be undertaken in combination with the BRCGS Food Safety audit. Each additional module will conform to its own certification requirements.

The modules may be 'public', i.e. an addendum shall be added to the audit report. A separate certificate shall be issued for the module.

'Private' additional modules are also available however these are certificated separately (separate audit report and certificate).

## 6. Exclusions from scope

The fulfilment of the certification criteria relies on clear commitment from the site management to adopt the best practice principles outlined within the Standard and to the development of a food safety culture within the business. It follows therefore that the exclusion of products from the scope of certification shall only be permitted by exception.

The exclusion of products produced at a site will only be acceptable where:

- the excluded products can be clearly differentiated from products within scope

AND

- the products are produced in a physically segregated area of the factory.

Where exclusions are requested, these shall be agreed with the certification body before the audit.

Products that fall outside the scope of the BRCGS Global Standard Food Safety should not be specified as an exclusion, for example:

- a food audit of a site also making by-products for the chemical industry with a non-food use.
- milk producers selling whey for industrial non-food use, in such circumstances the whey for non-food use would not be listed as an exclusion as non-food products are outside scope.

This also applies to sub-contracted services as covered by section 3.5.3 of the Standard where product leaves the site and does not return to it as the activities completed off site are outside the scope of the audit.

Where additional modules are not included within the audit they don't need to be listed as an exclusion. However, generally traded products shall be listed as an exception if the site handles traded products but elects to exclude them from the audit scope, i.e. *Exclusion: traded products*'.

Where exclusions are accepted, the auditor shall assess any hazards presented by excluded areas or products (e.g. the introduction of allergens or foreign-body risks) and will therefore need to audit those processes, products and production areas. Non-conformities may be raised relating to the excluded areas where this poses a risk to the product within the audit scope.

#### Reporting

Exclusions shall be clearly stated on the audit report and certificate and the justification recorded on the audit report.

For exclusions which fall outside the scope of the BRCGS Global Standard Food Safety, these shall be clearly identified and described in the company description of the audit report.

### **7. Use of BRCGS Food Safety logo by the site**

Use of the BRCGS Food Safety logo by certificated sites shall conform to the logo usage rules and its use shall ensure the integrity of the BRCGS brands at all times. It is important that reference to BRCGS and use of the logo does not misrepresent the certification status of the company or its manufacturing sites in any way.

The BRCGS food safety logo may not be used where any exclusions to scope are specified as this may cause confusion. The only exceptions to this rule are where traded products and separate storage areas are excluded from the scope of the audit. In these cases, the logo may still be used by the site.

Note that no reference to 'BRCGS' is permitted to be used, other than the 'official' logo. This shall not be used to promote traded products. The BRCGS Food Safety logo is allowed to be used on 'business to business' packaging but shall not be used on consumer facing product or shelf ready packaging.

Note that where a site is not compliant with the rules on use of the logo, the site shall receive a non-conformity against clause 1.1.13.

Further information about the use of logo is reported in [Brand Guidelines – Use of the BRCGS Logos for Certified Sites](#).

## 8. Wording of scope

Scopes shall be clear, succinct and unambiguous. Scopes must not include brand names and must not include a long list of products or processes. The scope shall be stated in English within the text fields. Where scopes are also given in another language, the translations shall be an accurate and convey the same meaning.

The scope should contain:

- A brief description of key elements of the process
- Product types
- Relevant packaging and product characteristics
- Where relevant, information on traded products and outsourced processes

Each of these is explained in detail below:

### Describe the key process

There should be a general outline of the main process - not detail of every step. Just use one or two words of detail so that the typical process characteristics can be understood. The key processes are those most likely to affect food safety.

Example processes are (not an exhaustive list):

*aseptic filling, baking, battering, blending, breadding, brewing, canning, coating, cooking, curing, cutting, dicing, distillation, drying, extrusion, fermentation, filtering, freeze drying, freezing, frying, grading, hot filling, irradiation, marinating, microfiltration, milling, mixing, pasteurisation, pickling, portioning, refining, ripening, roasting, slaughtering, slicing, smoking, sorting, steaming, sterilisation, washing, waxing*

Use of general terms such as 'manufacture', 'production', 'preparation', or 'processing' should only be used with care, and where the resultant products are clear.

Storage should only be used where a separate storage facility, not at the address of the certificated site, is included within scope (See section 2).

Words which cover generic parts of the process covered by the Standard and part of most site audits are not permitted in the scope wording, e.g. *procurement, intake, receipt, storage, product design and development, handling, dispatch*.

The following are NOT permitted because these are outside the scope of the Standard, e.g. *transport, sales, marketing, growing, distribution and delivery*.



## EXAMPLES

**X Unacceptable example:** 'Processing of mango and mandarin' is not acceptable as it is unclear what the 'process' is.

✓ **Acceptable example:** 'Pasteurisation of mango slices and mandarin segments and aseptic filling into glass packaging'

✓ **Acceptable example:** 'Sorting, grading and packing of mangoes and mandarins'

**X Unacceptable example:** 'Primary production of red and white wines from grape and base wine intake, malolactic fermentation, cold stabilization, blending, storage, filtration to final approved tanks. Secondary processing as carbonation, filling, capping, corking, labelling and packing of red, white and sparkling wines in glass bottles' is not acceptable as it contains too much detail on each process.

✓ **Acceptable example:** 'Fermentation of grapes and base wines, carbonation and packing into glass bottles of red and white wines.'

## Product Types

The products included within the scope must be clear on the certificate. However, it is not appropriate to list every individual product. Instead, products should be 'grouped' using clearly defined, recognisable and internationally understandable product types. General terms such as 'dairy' or 'meat' should include clarification of the types of products e.g. dairy products such as yogurts, cream, ice cream, soft cheese, milk etc; or red meat including pork, beef and game (pheasant and rabbit).

## EXAMPLES

**X Unacceptable example:** Cutting of meat is not acceptable as the type of meat is unclear

✓ **Acceptable example:** Cutting of red meat (beef and pork)

**X Unacceptable example:** Manufacture of Pistachio with shell, raw whole pistachio, chopped and sliced pistachios, pistachio croquants, pistachio dragées, roasted pistachio paste. This is not acceptable due to the long product list – it is not necessary to list every product. It is also helpful to avoid terms that do not have a well-known meaning (e.g. croquants and dragées).

✓ **Acceptable example:** Manufacture (e.g. chopping, slicing, roasting) and packing of pistachio nut products.

## Product claims

Claims such as 'free from', 'specific allergen claims', 'fortified' or 'vegetarian' must not be used in scope wording. This includes claims supported by other certification schemes (e.g. organic, halal). As general guidance products should be described as what they are made of, not what they are not e.g. 'vegetable-based meat substitute' is acceptable, 'cheese alternative' or 'without meat' is not.



Where products are known by a 'common name' e.g. 'extra virgin olive oil' or 'Cheddar cheese' these shall not be considered 'claims' for the purposes of scope wording (i.e. they can be included within the scope).

#### Packaging and product characteristics

Scope wording should only include packaging types (e.g. 'glass', plastic bottle, pouch, bag in box, cans, drum) where it adds clarifying detail to the products, processes or product safety. Do not list every type of packaging used.

Specific details such as 'modified atmosphere', vacuum packing, frozen, chilled should be included as these provide clarity regarding product safety.

#### Traded products

The traded products section is now included in the main Standard (section 9). Sites may choose to include or exclude traded products within their audit.

Where traded products are included within the scope of the audit, the scope shall describe the products traded as 'the trading of .....' using the guidance on product types as above.

#### Outsourced processing

Where there is an outsourced production process (i.e. a process that must comply with the requirements of section 3.5.4 of the Standard) this must be described in the scope, for example 'including outsourced ..... [define process] on ..... [define products]'

Please note that where product leaves the site and does not return to it, this is not outsourced processing but a subcontracted service (as covered by the requirements of section 3.5.3 of the Standard), and the activities completed off site are outside the scope of the audit and therefore cannot be included in the scope wording.

### **Examples of how to build a Food Safety scope**

#### **Example 1:**

Elements of Scope	Example
Main site functions	
Processes	<i>Washing of vegetables and blending, mixing, cooking and cooling of components for</i>
Product characteristics	<i>chilled, pH-controlled, ready-to eat</i>
Product type	<i>dips, snacks and ready meals</i>
Packaging	<i>packed into CPET/foil packaging Some products packed in modified atmosphere.</i>
Outsourced processing (subcontracted processing)	including outsourced <b>[define process]</b> on <b>[define products]</b>
Head office	<i>Incorporating head office audit at <b>[identifier and address, e.g. Office A, B street, Italy]</b></i>
Additional site	<i>[process]</i>

Offsite storage	including offsite <b>[ambient/chilled/frozen]</b> storage facility at <b>[address, e.g. Block Y, X Road, Devon]</b>
Traded Product	Trading of <b>[product types]</b>

Scope as it would appear on the report and certificate:

Washing of vegetables and blending, mixing, cooking and cooling of components for chilled, pH-controlled, ready-to eat dips, snacks and ready meals packed into CPET/foil packaging  
Some products packed in modified atmosphere. Including outsourced **[define process]** on **[define products]**. Incorporating head office audit at **[identifier and address, e.g. Office A, B street, Italy]**. including offsite **[ambient/chilled/frozen]** storage facility at **[address, e.g. Block Y, X Road, Devon]**. Trading of **[product types]**.

#### Example 2:

Elements of Scope	Example	
Main site functions	Product type 1	Product type 2
Processes	Mixing, forming and	Dough making, leavening, baking and
Product characteristics	Freezing of	shock freezing of
Product type	vegetable burger,	Pizza base (with or without tomato sauce)
Packaging	packed in vacuum bag.	Packed into shrink film/box

Scope as it would appear on the report and certificate:

Mixing, forming and freezing vegetable burger, packed in vacuum bag. Dough making, leavening, baking, and shock freezing of pizza bases (with or without tomato sauce), packing in shrink film/box.