Global Standard Consumer Products (Issue 5)

Draft for industry consultation

(December 2025)

Document scope:

Draft introduction, requirements and audit protocol and introduction for issue 5 of the Global Standard Consumer Products for industry consultation.

This document shall only be considered a draft document and not the final definitive text or normative version of the Standard. The content is open for comment and feedback only and must not be used as the basis for any derivative material including for training or promotion.

Following the consultation comments will be reviewed by the BRCGS Technical Working Group and where applicable, the draft Standard updated prior to publication of the final text *(see Part I, Introduction)*.

Consultation period: 11 December 2025 – 22 January 2026.

Change log:

Version no.	Date	Description
1	11.12.2025	BRCGS Standard Consumer Products Issue 5 for industry consultation.

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This is a draft document for industry consultation only and is not a definitive document for auditing purposes

How this publication is organised

This publication sets out the draft requirements for auditing and certification of consumer product manufacturers to achieve certification for the Global Standard Consumer Products, Issue 5.

The document consists of the following sections:

Part I - Introduction
Provides an introduction to this document and the consultation process.

Part II - Requirements
Details the proposed requirements of the standard with which a company must comply to gain certification.

Part III - Summary of the audit protocol
Details the proposed protocol updates of the standard and describes the requirements for auditing options and activities associated with the certification processes for company's seeking to gain certification.

Part I – Introduction: Global Standard Consumer Products (Issue 5) main changes

BRCGS Global Standard Consumer Products, Issue 4 was launched in 2016 and since that time the standard has remained abreast of current and emerging trends through Position Statements. The standard has undergone a full revision in 2025 to meet the current and future requirements of the FMCG consumer products sector.

As part of this review, there has been a revision of the structure of the standard, whilst ensuring that all product categories which had previously been used for certification of sites, continue to be included within the scope of the proposed new requirements. There has been a review of the product categories and consideration given to product categories that have not (to date) been used for the certification of sites e.g. building goods [11] and transport equipment, cycles and boats [16]. Products categories have been revised and Appendix 1 shows how products groups continue to fit into the new categories.

Other key changes to the standard include:

- one standard - Personal Care and Household and General Merchandise requirements have been built into one standard detailing the requirements for certification
- one level of achievement - removal of Foundation and Higher levels
- introduction of new sections:
  - Section 7 – Enhanced hygienic conditions - intended for those sites that manufacture products with:
    - Specific hygienic manufacturing legislation in relation to microbiological contamination applicable to country of manufacture and supply
      and/or
    - Where a risk assessment has identified that finished products can support microbiological growth or survival resulting in potential harm to the consumer
      Additional guidance is detailed in Appendix 2
  - Section 8 – Traded products – requirements for a site's management of traded products.

Brief outline of clause changes

The following matrix gives an indication of where changes have been made to the standard.

Global Standard Consumer Products, Issue 4 (based on Personal care and household – Higher level)	**Global Standard Consumer Products, Issue 5**
Section 1 Senior management commitment	**Section 1 Senior management commitment**
1.1 Senior management commitment and continual improvement	1.1 Senior management commitment and continual improvement
	1.2 Management review
1.2 Organisational structure, responsibilities and management authority	1.3 Organisational structure, responsibilities and management authority
Section 2 Product risk assessment	**Section 2 Product and process risk management**
	2.1 Design, development and product risk assessment
	2.1.1 Design, development and product risk assessment
2.1 Legislation and safety requirements	Included in 1.1.9
2.2 Product risk assessment	Included in 2.1.1.
2.3 Product labelling and claims	2.1.2 Product information, labelling and claims
2.4 Packaging materials	Included in 2.1.1

	2.2 Hazard analysis and risk assessment
	2.2.1 hazard analysis and risk assessment team
	2.2.2 Prerequisite programmes
	2.2.3 Product description
	2.2.4 Construct and verify process flow diagram
	2.2.5 List all potential hazards associated with each manufacturing step, conduct a hazard analysis and consider any measures to control identified hazards
	2.2.6 Determine control measures
	2.2.7 Establish and validate limits for each control measure
	2.2.8 Establish a monitoring system for each control measure
	2.2.9 Establish corrective action plans
	2.2.10 Validate the hazard analysis and risk assessment plan and establish verification procedures
Section 3 Product safety and quality management	**Section 3 Product safety and quality management**
3.1 Product safety and quality management system	3.1 Product safety and quality management system
3.2 Document control	3.2 Document control
3.43 Record completion and maintenance	3.3 Record completion and maintenance
3.4 Internal audit	3.4 Internal audits
3.5 Supplier approval and performance monitoring	3.5 Supplier approval and performance monitoring
	3.6 Management of outsourced processes
	3.7 Management and approval of suppliers of services
3.7 Specifications and technical files	3.8 Specifications 2.1.1.11 Technical files
3.7 Corrective and preventive action	3.12 Corrective and preventive actions
3.8 Control of non-conforming materials	3.10 Control of non-conforming materials
3.9 Traceability	3.9 Traceability
3.10 Complaint handling	3.11 Complaint handling
3.11 Management of incidents, product withdrawal and product recall	3.13 Incident management
Section 4 Site standards	**Section 4 Site standards**
4.1 External standards	4.1 External standards
4.2 Security	4.2 Site security and product defence
4.3 Layout, product flow and segregation	4.3 Layout, product flow and segregation
4.4 Building interiors	4.4 Building interiors
	4.5 Utilities
4.5 Staff facilities	6.4 Personnel facilities
4.6 Housekeeping and hygiene	4.6 Housekeeping and hygiene
4.7 Waste and waste disposal	4.7 Waste and waste disposal
4.8 Pest control	4.8 Pest management
4.9 Product storage, dispatch and transport	5.7 Storage facilities
	4.9 Equipment and equipment maintenance
	4.10 Product contamination control
	4.11 Foreign body detection and removal equipment
	4.12 Allergen and sensitising materials management
Section 5 Product inspection and testing	**Section 5 Product and process control**
Section 3 3.5.2 (Fundamental) Control and acceptance of incoming raw materials, components and packaging materials	5.1 Control and acceptance of incoming materials, components and packaging materials
	5.2 Product vulnerability
5.1 Product inspection and laboratory testing	5.3 Product inspection and laboratory testing
5.2 Quantity control	5.4 Quantity control
5.3 Product sample control	5.5 Product sample control
Section 6 Process control	**Section heading has changed**
6.1 Control of operations	5.6 Manufacturing process control 5.6.1 In-process control checks

Process risk assessment (aka HARA) has been moved to section 2	2.2 Process risk assessment
6.1.2.1 Line clearance and in-process checks moved to 5.6.1	5.6.2 Line clearance
6.2 Equipment and equipment maintenance	4.9 Equipment and equipment maintenance
6.3 Product contamination control 6.3.2 Chemical and biological control 6.3.3 Metal control 6.3.4 Glass, brittle plastic, ceramic, wood and similar material control 6.3.5 Foreign body detection and removal equipment 6.3.5.1 Filters and sieves 6.3.5.2 Metal detection and X-ray equipment 6.3.5.3 Magnets and optical sorting equipment	4.10 Product contamination 4.11 Foreign body detection and removal equipment 4.11.5 Container cleaning equipment
	5.7 Storage facilities
6.4 Calibration and control of measuring and monitoring devices	5.8 Calibration and control of measuring and monitoring devices
6.5 Final Product packing and control	5.9 Finished product packing and control
6.6 Stock control and product release	5.10 Product release
Section 7 Personnel	**Section 6 Personnel**
7.1 Training and competency	6.1 Training and competence
7.2 Protective clothing	6.2 Protective clothing
7.3 Hygiene practices	6.3 Personal hygiene
	6.4 Personnel facilities
	6.5 Medical screening
	Section 7 Enhanced hygienic conditions
	7.1 Layout, product flow and segregation
	7.2 Building interiors
	7.3 Utilities
	7.4 Equipment
	7.5 Personnel facilities
	7.6 Housekeeping, hygiene and sanitation
	7.7 Protective clothing
	7.8 Personal hygiene
	Section 8 Traded products
	8.1 Hazard analysis and risk assessment
	8.2 Approval and performance monitoring of manufacturers/packers
	8.3 Specifications
	8.4 Product inspection and testing
	8.5 Product legality
	8.6 Traceability

The scope of the standard

The Standard sets out the requirements for the manufacture and supply of safe and legal consumer products of consistent quality. The products may be customer-branded (private label), branded or unbranded, business to business, or for retail sale.

The Standard is a product safety and quality management standard. It does not encompass other important requirements applicable to manufacturing sites such as workplace health and safety, environmental concerns, sustainability, cyber security or ethical trading issues.

Compliance with the requirements of the Standard provides assurance that the manufacturing site processes take account of safety, legality and quality and that the products produced have met any legal or customer expectations. The Standard does not result in a product safety mark being placed onto products and does not replace or conflict with established technical product standards.

Scope of products

The scope of the Standard is for non-food, manufactured products placed on the market, sold or given to consumers. It may also be used by organisations producing materials and components for further processing of consumer products.

Specific exclusions from the scope of the Standard are:

- pharmaceuticals
- vitamins, minerals and herbal supplements
- bulk fuels
- transport and leisure vehicles
- building materials.

Changes to terminology

Within the standard there have been some changes made to specific terminology used. For the purpose of this consultation document the key changes include:

Site v company
The term ‘site’ has been used in the standard to indicate the unit of a company which is subject to audit and is encompassed within the audit scope, audit report and certificate.

The term ‘company’ indicates the entity with legal ownership of the site which is audited against the Standard.

Where activities are performed or carried out centrally within the company, e.g. purchasing, product development, supplier approval, this has been included in the Standard under the term of head office/central function activities.

The standard will continue to offer an option for head office/central function activities to be audited prior to, or included within, the site audit.

Personnel
Refers to all individuals employed by the site, including full-time, part-time, temporary, agency supplied, seasonal, homeworkers, contractors based on site such as cleaners, and engineers. The term is often used interchangeably with staff or employees.

Public consultation

The information included in this consultation document has been developed and reviewed by a working group made up of international stakeholders representing consumer product

manufacturers, retailers, trade associations, accreditation bodies, certification bodies and independent technical experts.

An important next step in the development of the Global Standard Consumer Products, Issue 5 is an extensive consultation to understand stakeholders' views and comments on this draft proposal.

This document therefore contains the proposals for Issue 5 and is structured as follows:

- Section II – full details of the proposed requirements for Issue 5
- Section III – a summary of the proposed update to the audit protocol for Issue 5

Stakeholders are encouraged to consider the details within this document and provide feedback on both the proposed requirements and the protocol, by email, to BRCGS.enquiries@lgcgroup.com using the feedback form provided.

The closing date for submission of feedback is **22 January 2026.**

Note: This draft is for the purposes of consultation only and the requirements and protocol are subject to change.

Effective date of Issue 5

As with all revisions of BRCGS standards, there must be a transition period between consultation, publication of the complete, finalised standard and its full implementation. Therefore:

- Issue 5 will be published in September/October 2026 (date to be confirmed)
- Certification against Issue 5 will commence in audits from April 2027

All certificates issued against audits carried out prior to this date will be against Issue 4 and be valid for the period specified on the certificate.

Part II – Requirements

Each clause of the Standard begins with a statement of intent. This sets out the expected outcome of compliance with the requirements of that section. It forms part of the audit, and all sites must comply with the statements of intent in order to gain certification.

Below the statement of intent in the tables are more specific and detailed requirements (clauses) that, if applied appropriately, will help to achieve the stated objective of the requirement. All of the requirements shall form part of the audit.

Fundamental requirements

Within the Standard, certain statements of intent have been designated as 'fundamental'. These are marked with the word '**FUNDAMENTAL**' The requirements that accompany these fundamental statements relate to the systems which are crucial to the establishment of an effective product quality and safety operation. They can be found in the following sections:

- Senior management commitment and continual improvement (1.1)
- Product and process risk management (2)
- Internal audits (3.4)
- Traceability (3.9)
- Corrective and preventive actions (3.12)
- Layout, product flow and segregation (4.3)
- Housekeeping and hygiene (4.6)
- Control and acceptance of incoming materials, components and packaging materials (5.1)
- Product inspection and laboratory testing (5.3)
- Manufacturing process control (5.6)
- Training and competence (6.1).

Failure to comply with the statement of intent of a fundamental requirement (i.e. a major non-conformity) leads to non-certification at an initial audit or withdrawal of certification at subsequent audits. This will require a further full audit to demonstrate evidence of compliance.

Enhanced hygienic conditions

The requirements in section 1 – 6 shall be applied in **all** operations.

Following the documented product risk assessment as per clause 2.1.1.3, the site shall confirm where it produces or assembles products where the manufacturing process, or part of it, requires enhanced hygienic conditions.

Enhanced hygienic conditions (section 7) is a requirement for sites that manufacture products with:

- Specific hygienic manufacturing legislation in relation to microbiological contamination applicable to country of manufacture and supply
  and/or

- Where a risk assessment has identified that finished products can support microbiological growth or survival resulting in potential harm to the consumer.

Where a site handles traded products, it can opt to include these products within the scope of their BRCGS audit. The requirements for traded products are detailed in section 8.

Traded products are defined as products that would normally fall within the scope of the Standard and are stored at the site's facilities but that are not manufactured, reworked or packed at the site being audited.

Draft requirements for public consultation

Section 1: Senior management commitment

1.1 Senior management commitment and continual improvement

Clause no.	BRCGS proposed wording
Statement of intent	**FUNDAMENTAL** **The site's senior management shall demonstrate that they are fully committed to the implementation of the requirements of the Global Standard Consumer Products and to processes which facilitate continual improvement of product safety, quality management, and the site's product safety and quality culture.**
1.1.1	The site shall maintain a documented policy which states the site's intention to meet its obligation to produce safe and legally compliant products, to the agreed quality and confirms its responsibility to its customers. This shall: • be signed by the person with overall responsibility for the site • be dated and reviewed • be communicated to all personnel • include commitment to continuously improve the site's product safety and quality culture.

1.1.2	The site's senior management shall define and maintain a clear and effective plan for the development and continuing improvement of a product safety and quality culture. The plan shall include measures needed to achieve a positive culture change.
	This shall include:
	• defined activities involving all of the site that have an impact on product safety, and quality to improve and further develop product safety and quality culture. As a minimum these activities shall be designed around:
	  • clear and open communication of product safety and quality
	  • training
	  • feedback from personnel
	  • the behaviours required to maintain and improve product safety processes
	  • performance measurement of activities related to the safety and quality of products
	• an action plan indicating how the activities will be undertaken and measured and the intended timescales (effective from 5 April 2028)
	• a review of the effectiveness of completed and ongoing activities. (effective from 5 April 2029).
	The plan shall be reviewed and updated, at a minimum annually.

1.1.3	The site shall have a confidential reporting system to enable personnel to report concerns relating to product safety, legality and quality.

	The mechanism for reporting concerns shall be clearly communicated to all personnel. The site's senior management shall have a process for assessing any concerns raised, for example any risks or evidence of unsafe or out of specification product, equipment or materials. Records of the assessment and, where appropriate, actions taken, shall be documented.
1.1.4	Personnel shall be aware of the need to report any risks or any evidence of unsafe or out-of-specification product, equipment or materials, to a designated manager to enable the resolution of issues requiring immediate action.
1.1.5	The site's senior management shall ensure that clear objectives are defined to maintain and improve the safety, legality and quality of products manufactured, in accordance with the product safety and quality policy and this Standard. These objectives shall be: • documented and include targets or clear measures of success • clearly communicated to relevant personnel • monitored and results reported at a suitable predetermined frequency to the site's senior management.
1.1.6	The site's senior management shall provide the human and financial resources required for the manufacture of safe and legally compliant products to the agreed quality and in compliance with the requirements of this Standard.
1.1.7	Where the site is certificated to the Standard, it shall ensure that announced or blended announced re-certification audits occur on or before the audit due date indicated on the certificate. It is the site's responsibility to ensure that all requirements are in place to ensure that the unannounced audit can be undertaken in accordance with the protocol of the Standard.
1.1.8	The site shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website.
1.1.9	The site's senior management shall have a system in place to ensure that the site is kept informed of and reviews: • scientific and technical developments • industry codes of practice • all relevant legislation applicable in the country of manufacture and, where known, the country where the product will be supplied Copies of documents shall be available to relevant personnel.
1.1.10	Where required by legislation, the site shall be registered with or approved by the appropriate governmental agency and evidence of this shall be available.
1.1.11	The site's senior management shall ensure that the root causes of any non-conformities identified at the previous audit against the Standard have been effectively addressed to prevent recurrence.

1.1.12	The most senior manufacturing or operations manager on site shall participate in the opening and closing meetings of the audit for certification to the Standard. Relevant departmental managers or their deputies shall be available as required during the audit. A member of the senior management team on site shall be available during the audit for a discussion on effective implementation of the product safety and quality culture plan.
1.1.13	The BRCGS logo and references to certification status shall be used only in accordance with the conditions of use detailed in the audit protocol of the Standard section.

1.2 Management review

Clause no.	BRCGS proposed wording
Statement of intent	**The site's senior management shall undertake a management review to ensure that the product safety and quality management system is both fully implemented and effective, and that opportunities for improvement are identified.**
1.2.1	Management review meetings attended by the site's senior management shall be undertaken at appropriate planned intervals, annually at a minimum, to review the site performance against the Standard and objectives set in clause 1.1.5.
1.2.2	The review process shall include the evaluation of: • previous management review action plans and timeframes • the results of internal, second- and/or third-party audits • any objectives (1.1.5) that have not been met, to understand the underlying reasons. This information shall be used when setting future objectives and to facilitate continual improvement • any customer complaints and the results of any customer feedback • any incidents, corrective actions, out-of-specification results and non-conforming materials • the effectiveness of the systems for HARA plans, product defence, product fraud prevention plans and product safety and quality culture plans • resource requirements.
1.2.3	Records of the meeting shall be documented and used to revise the objectives. The decisions and actions agreed within the review process shall be effectively communicated to appropriate personnel, and actions implemented within agreed timescales.

1.3 Organisational structure, responsibilities and management authority

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality, and quality.**
1.3.1	There shall be a current organisation chart demonstrating the management structure and reporting channels of the site. The responsibilities for the management of activities which ensure product safety, legality and quality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.
1.3.2	The site's senior management shall ensure that all personnel are aware of their responsibilities. Where documented, policies, procedures and work instructions exist for activities undertaken, the relevant personnel shall have access to these and be able to demonstrate that work is carried out in accordance with the instructions.
1.3.3	If the site does not have the appropriate in-house knowledge of product safety, legality and quality, external expertise (e.g. consultants, technical experts) may be used. However, the day-to-day management of the product safety and quality management systems shall remain the responsibility of the site.

Section 2: Product and process risk management

FUNDAMENTAL

This section incorporates both product design and development, and hazard analysis and risk assessment, both of which are required to be completed by all sites to gain certification to the Standard. Sites must meet the requirements of both sections. The sections are summarised as follows:

2.1 Design, development and product risk assessment

This is a key activity performed by all sites to ensure any products taken to market are safe, legal and of the agreed quality. Product design and development is not limited to new products but incorporates changes to existing products for example, change of size, manufacturing processes, materials, components, packaging and legislative changes.

Product design and development encompass product risk assessment and product information, labelling and claims.

2.2 Hazard analysis and risk assessment (HARA)

This activity focuses on the manufacturing process of the product identifying hazards associated with manufacturing activities. Typically, this step is completed once the product concept has been agreed e.g. following product design and development stage. Sites may combine the requirements of 2.1 and 2.2 during the product design and development stage.

2.1 Design, development and product risk assessment

Statement of intent	**Product design and development procedures shall be in place for new products or any changes to product to ensure safety, legality and agreed quality in the country of manufacture and the regions of intended supply where known.**

2.1.1 Design, development and product risk assessment

Clause no.	BRCGS proposed wording
2.1.1.1	The site shall have procedures for new product development and changes to existing products. Procedures shall include any restrictions to the scope of new product development to control the introduction of risks which would be unacceptable to the site, customers or brand owner. Where product design and development is not undertaken by the site and is the responsibility of a central function/head office or customer, the site shall be able to demonstrate that it has processes in place to transfer relevant information to the site's own systems.
2.1.1.2	Customer requirements relating to the design, development, specification, manufacture and distribution of the product shall be documented and agreed.

	The site shall be able to demonstrate verification of information provided by the customer or a third-party regarding product safety, legality and quality.
2.1.1.3	The site shall ensure that a product risk assessment is undertaken for each product or product group. The assessment shall be documented and include: • a description of the product assessed (for example, approved samples or mock-ups, sample drawings, computer graphics, photographs, the specification) • the intended use and functionality of the product and foreseeable misuse by the user • any claims or applicable legal requirements • the levels of risk and whether each risk is acceptable - including consideration for susceptibility to growth or survival of spoilage and/or pathogenic micro-organisms • the date the assessment was carried out, name of the person responsible and the evidence from which the assessment was derived. If the assessment indicates that a product may present an unacceptable risk to users, that product shall not be manufactured by the site. If the product requires modification, a new risk assessment shall be completed on the modified design. The assessment shall be undertaken by suitably trained and competent personnel. The site shall undertake a documented assessment of the products manufactured or packed at the site, using the criteria in the introduction to section 7 to identify if the enhanced hygiene requirements apply.
2.1.1.4	The product risk assessment shall be reviewed: • whenever changes occur to the specification • to reflect legislative requirements • in response to significant changes in manufacturing • following complaints or incidents with the product or similar products. The product risk assessment shall be reviewed at least annually as a minimum, to ensure that the assessment remains up to date.
2.1.1.5	Where there is a legal requirement or when it is necessary to confirm its safety or legality, a representative sample or product shall be submitted for testing to a suitably qualified and, where applicable, accredited laboratory. Test methods shall be defined, justified and recorded. When necessary, the frequency of testing and the means of selecting samples shall also be recorded. The results of the testing shall form part of the product risk assessment.
2.1.1.6	All new products and changes to product specifications, packaging or methods of manufacture shall be formally approved by a nominated responsible person or appropriate authorised personnel.

	Where legally required, the identity, competence, qualifications and/or licence of the person approving the risk assessment shall be verified and documented.
2.1.1.7	The site shall clearly define and document when a manufacturing trial is required. The site shall determine the outputs and success criteria required from a trial, and any changes and/or additions made to products, manufacturing characteristics or equipment as a result of a trial. Where appropriate, trials shall be carried out, and testing shall validate that manufacturing operations are capable of producing a safe and legal product to the agreed quality. New products or product changes shall be subject to suitable evaluation to ensure that the required product safety, legality and quality can be achieved. Settings derived from successfully conducted manufacturing trials or equipment installations shall be transferred accurately to manufacturing process control documentation.
2.1.1.8	Product packaging shall be designed for suitability with regard to: • protecting the product from damage • maintaining product integrity • protecting the consumer from injury • preventing contamination • providing information to allow the safe handling, display, storage, and use of the product.
2.1.1.9	Shelf-life trials, where applicable, shall be undertaken using documented protocols that reflect conditions expected during manufacture, storage, transport/distribution, use and handling. Results shall be recorded and retained. Where shelf-life trials prior to manufacturing are impractical, a documented science-based justification for the assigned shelf life shall be used. Where applicable, the site shall ensure that product-in-use evaluation, reliability trials and shelf-life tests are validated.
2.1.1.10	Where a product is designed to enable a claim to be made, the site shall ensure that all claims are substantiated, and product specification and the manufacturing process are fully validated to meet the stated claim and any legal requirements (in the country of intended supply) relating to the claim.
2.1.1.11	Sites shall have a product technical file that is accessible to relevant personnel containing all information (or details of where the information is located) to ensure that products meet the requirements of the specification, legislation and customer requirements. Relevant data may include the following, although this is not an exhaustive list: • bill of materials

	• safety data sheets on all chemicals used where relevant to the safety, legality or quality of the product • risk assessment(s) • results of any conformity assessment, e.g. test reports, inspection reports and product safety assessments. • legislation and product standards for which the products comply • manufacturing control procedures • approvals by any governmental agencies (if applicable). The technical file shall be updated following any product changes, legislation and maintained throughout the life of the product.
2.1.1.12	A technical product specification or agreed sample shall be prepared and formally agreed with the customer or brand owner before the manufacturing process begins, where relevant.
2.1.1.13	A procedure shall be in place to address the transfer of final agreed customer specifications or requirements to the site's own systems.

2.1.2 Product information, labelling and claims

2.1.2.1	All products shall be labelled to meet legal requirements for the designated country of supply and shall include information to allow the safe handling, display, storage, and use of the product. The site shall have a procedure for label and artwork approval and sign-off.
2.1.2.2	There shall be effective processes in place to ensure that labelling information is reviewed whenever changes occur to: • the product specification • materials or components • the supplier of materials • the country of origin of materials • legislation • claims.
2.1.2.3	Where the label information is the responsibility of a customer or a nominated second or third party, the site shall provide information to the relevant parties: • to enable the label to be accurately created • whenever a change occurs which may affect the label information.

2.2 Hazard analysis and risk assessment

Statement of intent	**A hazard analysis and risk assessment (HARA) shall be developed, implemented and maintained to ensure that all manufacturing process hazards to product safety and legality shall be identified and appropriate controls established.**

2.2.1 Hazard analysis and risk assessment team

2.2.1.1	The hazard analysis and risk assessment (HARA) shall be developed, reviewed and managed by a multi-disciplinary team that includes those responsible for quality, technical, manufacturing and other relevant functions (e.g. engineering, product development). The team shall ensure that the appropriate knowledge and expertise are available for the development and maintenance of an effective HARA, including being kept up to date with factory changes and customer requirements as they occur. The team shall have a designated team leader who shall be suitably trained and able to demonstrate competence and experience of hazard analysis and risk assessment principles and their application.

2.2.2 Prerequisite programmes

2.2.2.1	The team shall establish and maintain environmental and operational programmes necessary to create an environment suitable to manufacture safe and legal products (prerequisite programmes). As a guide these may include the following, although this is not an exhaustive list: • design, development and product risk assessment (section 2.1.1) • supplier approval and purchasing (section 3.5) • building interiors (section 4.4) • housekeeping and hygiene (section 4.6)/housekeeping, hygiene and sanitation (section 7.6) • waste and waste disposal (section 4.7) • pest management (section 4.8) • equipment and equipment maintenance (section 4.9) • product contamination control (section 4.10) • in-process control checks (section 5.6.1) • line clearance (section 5.6.2) • storage facilities (5.7) • calibration and control of measuring and monitoring device (section 5.8) • finished product packing and control (section 5.9) • dispatch and transport (section 5.11) • personnel - training and competence (section 6.1) • personal hygiene requirements (section 6.2). The control measures and monitoring procedures for the prerequisite programmes shall be clearly documented and shall be included within the development and reviews of the HARA.

2.2.3 Describe the product

2.2.3.1	The scope of the HARA shall be clearly defined and shall include all products or groups of products and manufacturing operations within the intended scope of certification.

2.2.3.2	A full description of the products or groups of products shall be developed, which includes all relevant information. As a guide, this may include the following, although this is not an exhaustive list: • composition (e.g. materials, components) • origin of materials, including use of recycled materials, customer specified components • manufacturing processes undertaken • intended use of the finished products and defined restrictions on use, e.g. CE marking, suitability for vulnerable groups • storage conditions and expected usable life of the finished product.
2.2.3.3	All relevant information needed to conduct the HARA shall be collected, maintained, documented and updated. As a guide, this may include the following, although this is not an exhaustive list: • technical files • historical and known hazards associated with specific processes, materials, components and finished products • relevant codes of practice or recognised guidelines • legislation relevant to the manufacturing and supply of finished products • customer requirements • a copy of any existing site HARA plans (e.g. for products already in manufacture at the site) • a map of the premises and equipment layout • intended use of the product, expected alternative or misuse (where known) • known likely defects that affect product safety • allergen-containing/sensitising materials and components • conditions for storage, method of transport and distribution • packaging used for the protection of the finished product.

2.2.4 Construct and verify process flow diagram

2.2.4.1	A flow diagram shall be prepared to cover each product, group of products and manufacturing process. This shall set out the sequence and interaction of the steps in the operation including any process delays. This may include: • receipt, storage and preparation of materials and components • each step of the manufacturing process including work in progress and product holding steps • introduction of utilities and other contact materials (e.g., air, water and packaging materials) • outsourced processes including home workers • in-line testing or measuring equipment • the use of rework and recycled materials • waste • work in progress, finished product storage and dispatch • customer returns or materials to be returned to the supplier

	• segregation for areas requiring enhanced hygienic conditions. Where the flow diagram(s) have been generated centrally the site shall be able to demonstrate that the specific steps identified have been verified by the on-site HARA team.
2.2.4.2	The HARA team shall confirm the accuracy of the flow diagram(s) at least annually and whenever there are changes, by following the actual process flow diagram in the relevant areas of the site. Seasonal variations shall be considered and evaluated. Records of verified flow diagrams shall be maintained.

2.2.5 List all potential hazards associated with each manufacturing step, conduct a hazard analysis and consider any measures to control identified hazards

2.2.5.1	The HARA team shall identify and record all the potential product safety, legality and hazards that are reasonably expected to occur at each manufacturing step. The team may consider the following types of hazards (this is not an exhaustive list): • physical or chemical product contamination • physical damage • microbiological contamination • radiological • raw material fraud (e.g. substitution, adulteration or misrepresentation) • malicious intervention • allergen / sensitising material contamination • any other specific hazard relating to the product and its intended use.
2.2.5.2	The HARA team shall conduct a hazard analysis to identify the hazards which need to be controlled, prevented, eliminated or reduced to acceptable levels. Consideration shall be given to at least the following: • likelihood of occurrence, considering prerequisite programs in the absence of additional control • severity of the hazard • existing activities that effectively prevent or reduce the hazard to acceptable limits.
2.2.5.3	The HARA team shall consider the control measures necessary to prevent or eliminate each product safety, legality hazard or reduce it to an acceptable level. Consideration may be given to using more than one control measure, including relevant prerequisites. Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented.

2.2.5.4	Where the control of any product safety or legality hazard is achieved through prerequisite programmes or manufacturing process control this shall be documented (see sections 2.2.2 and 5.6). The adequacy of the programme to control the hazards shall be validated.

2.2.6 Determine control measures

2.2.6.1	For each hazard that requires control, measures shall be identified to prevent or eliminate the hazard that affects product safety or legality, or to reduce it to an acceptable level. Where a hazard is identified at a step where control is necessary, but the control does not exist, the product or manufacturing step shall be modified at that step, or at an earlier step, to provide a control measure.

2.2.7 Establish and validate limits for each control measure

2.2.7.1	For each control measure, the appropriate limits essential to product safety and legality shall be defined to clearly identify whether the manufacturing step is in or out of control. Limits shall be: • measurable wherever possible • supported by clear guidance or examples where measures are subjective (e.g. photographs).
2.2.7.2	The HARA team shall validate those control measures and limits essential to product safety and legality. Documented evidence shall show that the control measures selected, and limits identified are capable of consistently controlling the hazard to the specified acceptable level.

2.2.8 Establish a monitoring system for each control measure

2.2.8.1	A monitoring procedure shall be established for each control measure to ensure compliance with limits. The monitoring system shall be able to detect loss of control of the measures and, wherever possible, provide information in time for corrective action to be taken. As a guide, consideration may be given to the following, although this is not an exhaustive list: • on-line measurement • off-line measurement at predetermined intervals • continuous measurement.
2.2.8.2	Records associated with the monitoring of each control measure shall include the date, time and result of measurement. The records shall be signed by or be electronically traceable to the person responsible for the monitoring.

2.2.9 Establish corrective action plans

2.2.9.1	The HARA team shall specify and document the corrective action to be taken when monitored results indicate: • a failure to meet a control limit or • a trend towards loss of control. This shall include the action to be taken by nominated personnel regarding: • any products that have been manufactured during the period when the activity was out of control • how control was regained • how potential recurrence is minimised.

2.2.10 Validate the hazard analysis and risk assessment plan and establish verification procedures

2.2.10.1	Where the hazard and risk analysis has been undertaken by a central function or a head office, the site shall be able to demonstrate that it has been verified to meet the specific activities of the local operation.
2.2.10.2	HARA plans shall be validated prior to any changes which may affect product safety and legality to ensure that the plan will effectively control the identified hazards before implementation. For existing HARA plans, this may be achieved using the established processes detailed in requirements 2.2.10.3 and 2.2.10.4.
2.2.10.3	Verification procedures shall be established to confirm that the HARA plan, including controls managed by prerequisite programmes, continues to be effective. Examples of verification activities include: • internal audits • review of records where acceptable limits have been exceeded • review of complaints or feedback • review of incidents of product withdrawal or recall. Results of verification shall be recorded and communicated to the HARA team.
2.2.10.4	The HARA team shall review the plan, prerequisites and flow diagrams at least annually and prior to any change that impacts the potential hazards and/or the control measures which may affect product safety and legality. As a guide, these may include the following, although this is not an exhaustive list: • change in materials or supplier of materials or components • change in product composition • change in manufacturing conditions, process flow, manufacturing environment, or equipment • change in packaging material, storage or distribution conditions • change in consumer use • trends in root cause and/or testing/analysis results

	• emergence of a new risk to product safety or legality • results from verification activities as defined in clause 2.2.10.3 • internal and external audits • following incidents of product withdrawal or recall • new legislation or developments associated with materials and components, manufacturing, or product. Appropriate changes resulting from the review shall be incorporated into the HARA and/or prerequisite programmes. Changes shall be fully documented, and the validation shall be recorded. Where appropriate, the changes shall also be reflected in the site's policy (clause 1.1.1) and objectives (clause 1.1.5).

2.2.11 Hazard analysis and risk assessment documentation and record-keeping

2.2.11.1	Documentation and record-keeping shall be sufficient to enable the site to verify that the HARA and product safety and legality controls, including controls managed by prerequisite programmes, are in place and maintained.

Section 3: Product safety and quality management

3.1 Product safety and quality management system

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall document processes and procedures to meet the requirements of the Standard to allow consistent application, facilitate training, and support due diligence in the manufacture of safe, legally compliant products of the agreed quality.**
3.1.1	The product safety and quality system shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary.
3.1.2	The site's policies, procedures, working methods and practices shall be collated in a readily accessible system that is easy to navigate. Consideration shall be given to translation into appropriate languages, including the use of photographs, diagrams or other pictorial instructions where written communication alone is not sufficient (e.g. there are issues of literacy or foreign language). Where the site is part of a company governed by a head office/central function, the interaction between the site's system and that of other sites and the head office/central office shall be documented.

3.2 Document control

Statement of intent	**An effective document control system shall ensure that only the correct approved versions of documents, including record forms, are available and in use.**
Clause no.	BRCGS proposed wording
3.2.1	The site shall have a document control procedure to manage documents which form part of the product safety and quality management system. This shall include: • a list of all controlled documents indicating the latest version number • the method for the identification and authorisation of controlled documents • a record of the reason for any changes, or amendments to the documents • the system for the replacement of existing documents when they are updated, including communicating changes to relevant personnel.
3.2.2	Where documents and records are in electronic form these shall be: • stored securely (e.g. with authorised access, control of amendments, or password-protected) • backed up to prevent loss or malicious intervention.

3.3 Record completion and maintenance

Statement of intent	**The site shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.**
Clause no.	BRCGS proposed wording
3.3.1	Records shall be legible, appropriately authorised, retained in good condition, and retrievable.
3.3.2	Any alterations to records shall be authorised and justification for the alteration shall be recorded.
3.3.3	The site's senior management shall ensure that procedures are established and implemented for the organisation, review, maintenance, storage and retrieval of all records relating to product safety, legality and quality.
3.3.4	Records shall be retained for a defined minimum period with consideration given to: • legal requirements • the shelf life of the product • customer requirements.

3.4 Internal audits

Clause no.	BRCGS proposed wording
Statement of intent	**FUNDAMENTAL** **The site shall be able to demonstrate that it verifies the effective application of the HARA plan, the implementation of the Standard, the product safety and quality management system and any additional modules.**
3.4.1	There shall be a scheduled programme of internal audits which shall be fully implemented and effective. At a minimum, the programme shall include at least two different non-consecutive audit dates spread over an annual period. The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All activities shall be audited at least annually.
3.4.2	Each internal audit within the programme shall have a defined scope and consider a specific activity or section of the product safety plan and product safety and quality management system in relation to the Standard.
3.4.3	Internal audits shall be carried out by appropriately trained, competent auditors. Auditors shall be independent from the process or activity being audited to ensure impartiality (i.e. they must not audit their own work).
3.4.4	Internal audit reports shall identify conformity, as well as non-conformity, and include objective evidence of the findings.

	The results shall be reported to the personnel responsible for the activity audited. Corrective and preventive actions, and timescales for their implementation, shall be agreed and their completion verified. All non-conformities shall be handled as detailed in section 3.12. A summary of the results shall be reviewed in the management review meetings (see clause 1.2.2).
3.4.5	In addition to the internal audit programme, there shall be a separate programme of documented inspections to ensure that the site environment, infrastructure and equipment are maintained in a suitable condition. The frequency of these inspections shall be based on risk. The results shall be reported to the personnel responsible for the activity or area audited. Corrective actions, and timescales for their implementation, shall be agreed. Summary of the results shall be reviewed in the management review meetings (see clause 1.2.2).

3.5 Supplier approval and performance monitoring

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall have an effective supplier approval and monitoring system to ensure that any potential risks from materials, components and packaging materials to the safety, legality and quality of the finished product are understood and managed.**
3.5.1	The site shall have a documented approval procedure for suppliers of materials and components, including packaging materials, based upon risk analysis and defined performance criteria. The procedure shall ensure that materials are procured according to defined requirements where there is a potential impact to product safety, legality and quality.
3.5.2	The approval procedure of suppliers of materials, components and packaging materials that influence product safety, legality and quality shall be based on risk and include either one or a combination of: • certification to a globally recognised product safety or quality management system that incorporates an assessment of traceability and confirmation that products supplied are safe and legal, e.g. declaration of compliance. The scope of certification shall include the products purchased • supplier audits, with a scope to include a review of the product safety and quality system, traceability, prerequisite controls, undertaken by an experienced and competent auditor. A full audit report shall be available. Where the supplier audit is completed by a second- or third-party, the site shall be able to: • demonstrate the competency of the auditor

	• confirm that the scope of the audit includes a review of the product safety system, traceability, and prerequisite controls • obtain, review and approve a copy of the full audit report • supplier self-audit questionnaire or supplier-provided information may be used for approval. The questionnaire shall have a scope that includes the product safety and quality system for the product supplied, verification of the traceability system, and prerequisite controls, and it shall be reviewed and approved by a competent person. • certificate of analysis – applicable to the products purchased where justification demonstrates that suitable product safety and legality is assured. Where approval cannot be based on the above, then the site shall be able to demonstrate their criteria for approval and evaluation of the supplier to ensure that all supplied products do not pose a risk to product safety, legality and quality and meet the specified requirements and specifications or historical evidence of good supply.
3.5.3	There shall be a procedure for ongoing supplier approval and performance monitoring review, based on risk and defined performance criteria. The process shall be fully implemented. Records of this monitoring shall be retained with consideration given to legal requirements, product shelf life and customer requirements.
3.5.4	Where ongoing supplier approval is based on questionnaires, or supplier-provided information, these shall be repeated, and traceability systems verified, at agreed intervals based on risk.
3.5.5	Where materials are purchased from companies that are not the manufacturer or packer (e.g. purchased from an agent, broker or wholesaler), the site shall know the identity of the last manufacturer or packer. Information to enable the approval of the manufacturer or packer shall be obtained from the agent, broker or wholesaler, unless they are certificated to the relevant BRCGS standard (e.g. Global Standard Consumer Products, with section 8, Traded Products, Global Standard Agents and Brokers, Global Standard Storage and Distribution with Wholesaler module) or equivalent standard.
3.5.6	Suppliers shall be required to notify the site of any significant changes, including any changes that could have an impact on product safety, legality or quality.
3.5.7	Procedures shall define the actions required in the following circumstances: • an exception to the supplier approval processes in clause 3.5.2 occurs (e.g. where material suppliers are prescribed by a customer) • due to an emergency supply situation where it is limited to the length of the contingency required. In these circumstances, an assessment of incoming materials may include certificates of analysis, statement of compliance, or be through testing.

3.6 Management of outsourced processes

Outsourced processes are defined as where intermediate manufacturing steps, or intermediate storage, in the manufacture of a product is completed at another site.

During outsourced processes the product or partly processed product leaves the site being audited to be stored or for an outsourced manufacturing operation to be completed, before returning to the site.

Where there is additional storage or processing of materials prior to their initial arrival on site, this is not considered as outsourced but should be managed by the site using supplier approval and material specifications.

Where a product undergoes further manufacturing operations off-site and the product does not return to site, this is not considered an intermediate step or outsourced processing. This is outside the scope of the audit.

Section no.	BRCGS proposed wording
Statement of intent	**Where any intermediate process step (including manufacturing or storage) in the manufacturing operation is outsourced to a third party, or undertaken at another site, and subsequently returned to the site, this shall be managed to ensure it does not compromise the product safety, legality or quality.**
3.6.1	The site shall be able to demonstrate that, where any intermediate manufacturing operations are outsourced and undertaken off-site, this has been declared to the relevant parties and, where required, approval agreed.
3.6.2	Where any intermediate manufacturing steps are outsourced, the risks to the safety, legality and quality of the product shall form part of the hazard analysis and risk assessment plan. The site's evaluation of the outsourced manufacturing operations shall be recorded.
3.6.3	Requirements for outsourced operations including home working activities shall be agreed and documented in a service specification or agreement, which includes an effective traceability system. This shall include any specific requirements for the products.
3.6.4	Incoming goods, including materials returned to site from outsourced processors and home workers, shall be subject to a documented batch release procedure. Records shall be maintained.
3.6.5	Where any outsourced activity is undertaken, final release of the product shall remain the responsibility of the site to ensure product safety, legality, and quality meets specification.

3.7 Management and approval of suppliers of services

Section no.	BRCGS proposed wording
Statement of intent	**The site shall be able to demonstrate that, where services are outsourced, risks presented to product safety, legality or quality have been evaluated to ensure effective controls are in place.**

3.7.1	There shall be a procedure for the approval and monitoring of suppliers of services. Such services shall include, but are not limited to: • outsourced processes including home working • pest control • laundry services • cleaning services • transport and distribution • storage • assembly packers • sorting or rework • laboratory services • calibration services • waste management • external expertise (e.g. consultants, training providers) • servicing and maintenance of equipment • providers of agency personnel. Providers of utilities such as water, electricity or gas may be excluded on the basis of risk. The frequency of approval and monitoring shall be risk-based, or whenever significant changes occur and shall consider: • risk to the safety and quality of products • compliance with any specific legal requirements • potential risks to the security of the product (i.e. risks identified in the vulnerability and product defence assessments).
3.7.2	Contracts or formal agreements shall exist with suppliers of services which clearly define expectations and ensure potential risks associated with the service have been addressed. Where appropriate, copies of relevant licences should be retained or be accessible.

3.8 Specifications

Clause no.	BRCGS proposed wording
Statement of intent	**A system shall be in place to manage specifications for materials, components, work in process, finished product and packaging materials.**
3.8.1	Specifications shall: • be suitably detailed, accurate and compliant • be maintained up to date with relevant product safety, legislative, quality and customer requirements • include key data to meet customer and legal requirements • assist the user in the safe usage of the product. This may be in the form of a printed or electronic document, or part of an online specification system.
3.8.2	Specifications shall be accessible to relevant personnel.

	The site shall seek formal agreement of specifications with relevant parties, where required. Where specifications are not formally agreed, the site shall be able to demonstrate that it has taken steps to put an agreement in place.

3.9 Traceability

Clause no.	BRCGS proposed wording
Statement of intent	**FUNDAMENTAL** **The site shall be able to trace all materials, components, primary packaging materials and products through all stages of manufacturing (including outsourced processing). This shall include forwards from suppliers to delivery to customers, and backwards from the finished product delivered to the customer to the suppliers.**
3.9.1	The site shall have a procedure designed to maintain traceability throughout the site's operations. At a minimum, this shall include: • how the traceability system works • the product identification systems (such as labelling and coding of materials, work in progress, finished products), and the records required. Where continuous processes are used, or materials are in bulk silos, traceability shall be achieved to the best practical level of accuracy.
3.9.2	All material shall be adequately identified to ensure traceability. This includes: • materials • work in progress/semi-processed products • part used materials • rework • packaging • processing aids • finished products • materials pending investigation/non-conforming products and quarantined goods.
3.9.3	Finished product shall be identified with a unique code such as a batch code applied to the product or packaging where legally required or specified by the customer. Where coding is applied, this shall be checked for legibility and accuracy.
3.9.4	The site shall test the operation of the traceability system from material receipt, through manufacture including any outsourced processing to the finished packaged product delivered to customer and vice versa. The traceability test shall include a summary of the documents referenced during the test and clearly show the links between them. The test shall occur at a predetermined frequency (at a minimum annually) and results shall be retained.

	Traceability should be achievable within 4 hours, unless otherwise specified by local legislation or customer requirements.
3.9.5	Where different processes and traceability systems are used on site, the site shall ensure these are covered under the testing of the traceability system.
3.9.6	Where rework or any recycling operation is carried out, traceability shall be maintained.
3.9.7	Traceability of test data and samples to manufacturing lots shall be maintained.

3.10 Control of non-conforming materials

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall ensure that non-conforming materials, work in progress and finished product are clearly identified, labelled and effectively managed to prevent unauthorised release.**
3.10.1	Procedures for the control of non-conforming materials shall be in place and understood by relevant personnel. These shall include the effective identification and management of materials before a decision is made on their final disposition.
3.10.2	Non-conforming materials shall be assessed by authorised personnel, and a decision taken to reject, accept by concession, rework, or put to alternative use. The decision and reasons shall be documented.

3.11 Complaint handling

Clause no.	BRCGS proposed wording
Statement of intent	**Complaints relating to product safety, legality and quality shall be handled effectively and the information used to manage the level of complaints or aim to reduce and drive improvement.**
3.11.1	Complaints shall be recorded and where sufficient information is provided, investigated and the results of the investigation into the issue recorded. Actions appropriate to the seriousness and frequency of the complaint shall be carried out promptly and effectively to reduce the likelihood of recurrence.
3.11.2	Complaint data shall be analysed to identify significant trends. Where there has been an increase or repetition of a complaint type, root cause analysis shall be used to implement ongoing improvements to product safety, legality and quality. This analysis shall be made available to relevant personnel.

3.12 Corrective and preventive actions

Clause no.	BRCGS proposed wording
Statement of intent	**Fundamental** **The site shall be able to demonstrate that it uses the information from identified issues in the product safety and quality management system (e.g. non-conforming products, internal audits, complaints, incidents, product recalls, product testing, second- and third-party audits) to complete necessary corrective actions and prevent recurrence.**
3.12.1	The site shall have an effective procedure for the recording, timely investigation and correcting of issues identified in the product safety and quality management system. The site procedures shall include the completion of corrective actions, root cause analysis where appropriate and the implementation of preventive action within appropriate timescales.
3.12.2	Where a non-conformity places the safety or legality of a product at risk, or where there is an adverse trend in quality, this shall be investigated and recorded including: • clear documentation of the non-conformity • assessment of consequences by a suitably competent and authorised person(s) • the corrective action to address the immediate issue • appropriate timescales for corrective and preventive actions • the person(s) responsible for corrective and preventive actions • verification that the corrective and preventive actions have been implemented and are effective. When trend analysis shows that there has been a significant increase in a type of non-conformity, root cause analysis shall be used to identify preventive action to minimise potential for recurrence, and to implement ongoing improvements.

3.13 Incident management

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall have a procedure to effectively manage incidents, including product withdrawals, recalls, and returns from customers.**
3.13.1	The site shall provide guidance and instruction for relevant personnel regarding the type of event that would constitute an incident. Incidents may include: • accidental, malicious contamination or sabotage of product • product failure or significant non-conformity • disruption to normal manufacturing operations • disruption to key services such as water, energy, distribution, personnel availability and communications • events such as fire, flood or natural disaster • failure of, or attacks against, digital cyber-security

	• spillages e.g., plastic pellets, detergents, solvents, etc. which may impact the site. Personnel involved in incident management shall be trained in the procedure.
3.13.2	An incident management procedure shall be established, implemented and maintained. It shall include as a minimum: • identification of the key personnel involved in assessing severity and impact of an incident, actions to be taken and clearly defined responsibilities • the actions required to effectively manage an incident to prevent release of product where product safety, legality or quality may have been affected • recovery plans, including logistics, for return, storage of recovered product and product disposal • an up-to-date list of key contacts, with details of agencies providing advice and support • a communications plan including methods of informing customers, logistics, organisations such as regulatory bodies and/or certification body, where relevant. The site shall be aware of and adhere to any legal reporting obligations in the regions of supply • root cause analysis and corrective action to implement appropriate improvements as required. The incident management procedure shall be capable of being put into operation at any time.
3.13.3	The site shall have written technical and quality agreements in place with agents and distributors and other parties in the supply chain where these are necessary to ensure effective withdrawal/recall.
3.13.4	Where products have been released from the site that could be affected by an incident, the need to withdraw products and, where appropriate, advise customers to withdraw and/or recall products, shall be considered. Where products are involved in a customer branded product withdrawal, or recall, the site shall assist with provision of information (such as traceability) as required.
3.13.5	The incident management procedure relating to product recall/withdrawal shall be tested, at least annually, in a way that ensures its effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test, and of any actual incidents, shall be used to review the procedure and implement improvements as necessary.
3.13.6	In the event of a significant product safety or legality incident, the site shall notify the current certification body within 3 working days. The site shall then provide sufficient information to enable the certification body to assess any effects of the incident on the ongoing validity of the

	current certificate within 21 calendar days. As a minimum, this shall include corrective action, root cause analysis and a preventive action plan.

Section 4: Site standards

4.1 External standards

Statement of intent	**The site shall be of suitable size and construction, in a suitable location, and maintained to an appropriate standard to reduce the risk of contamination and facilitate the manufacture of safe, legal and quality products.**
Clause no.	BRCGS proposed wording
4.1.1	The site boundaries shall be clearly defined. The external areas shall be maintained in good order. Any grassed or planted areas surrounding buildings shall be regularly tended and well maintained. External traffic routes under site control shall be suitably surfaced to avoid contamination of the product.
4.1.2	Consideration shall be given to local activities and the site environment, which may have an adverse impact on the safety, legality or quality of the materials, components and products. Measures shall be taken to prevent contamination. Where measures have been put in place to protect the site, they shall be regularly reviewed to ensure they continue to be effective (e.g. flood controls).
4.1.3	The building exteriors shall be maintained to minimise potential for product contamination, pest entry, ingress of water and other contaminants. External silos, pipework or other access points for the product and/or materials shall be appropriately sealed and secured. An unobstructed area shall be provided along the external walls of the buildings used for manufacturing and/or storage. For areas not under the control of the site, that could have an effect on the site operations, mitigations should be in place to ensure that any risk is managed.
4.1.4	Where natural external drainage is inadequate, additional drainage shall be installed. External drains shall be properly protected to prevent entry of pests.

4.2 Site security and product defence

Statement of intent	**Security shall be maintained to prevent unauthorised access to manufacturing and storage areas.** **Processes shall be in place to protect products and sites from malicious actions.**
Clause no.	BRCGS proposed wording
4.2.1	The site shall undertake an assessment of the site security arrangements. Access to the site by personnel, contractors and visitors shall be controlled and a visitor-reporting system shall be in place.

	Personnel shall be trained in site security procedures and encouraged to report unidentified or unknown personnel.
4.2.2	The site shall undertake a documented assessment of the potential risks to the products from any deliberate attempt to inflict contamination or damage. This assessment shall include both internal and external threats. The output from this assessment shall be a product defence plan, specifying systems and procedures to be implemented to mitigate any identified risks. The plan shall be monitored to ensure it is effectively implemented. It shall be formally reviewed at least annually and whenever: • a new risk emerges (e.g. a new threat is publicised or identified) • an incident occurs where there is an identified failure in site security or product defence. Where applicable, the product defence plan shall meet the legal requirements in the country of supply or intended use. The review of the effective implementation of the product defence plan shall be auditable from 5 April 2028.
4.2.3	Nominated site personnel shall be responsible for overseeing contractors and service provider activities with regard to potential impact on the security of the site and the safety, legality or quality of products.

4.3 Layout, product flow and segregation

Statement of intent	**FUNDAMENTAL** **The site layout, machinery and equipment, flow of manufacturing operations and movement of personnel shall be sufficient to prevent the risk of product contamination and damage and to comply with relevant legislation.**
Clause no.	BRCGS proposed wording
4.3.1	There shall be a current map, or plan of the site, which defines: • access points for personnel • travel routes for personnel, materials, components, work in progress and finished products • personnel facilities • routes for the removal of waste • flow of manufacturing operations • areas requiring enhanced hygienic conditions (section 7) • storage areas.
4.3.2	Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out and, if necessary, in hygienic conditions. The necessary level of hygiene shall be maintained for each product. (See clause 7.1.)

4.3.3	Sites shall be designed so that movement of all personnel is by simple, logical routes. If it is necessary to allow access through manufacturing areas, designated walkways shall be provided that ensure that product safety, legality and quality is not compromised.
4.3.4	The location of facilities and services, including toilets, cleaning and catering facilities, shall be segregated and separated from manufacturing and storage areas and shall not impact on the integrity of the product.
4.3.5	There shall be effective segregation to minimise the risk of product cross-contamination at all manufacturing and storage steps considering, where appropriate, the flow of: • product • materials, components and packaging • machinery and equipment • personnel • waste • airflow • air quality • utilities.
4.3.6	The site shall determine whether allergenic or sensitising materials are used and, if so, procedures shall be implemented for the handling of such materials including: • physical or time segregation • use of identified, dedicated equipment if necessary • adequate labelling.
4.3.7	Where materials, components, packaging and products require segregation or special handling procedures (e.g. materials intended for different geographical regions) these shall be controlled to ensure product safety, legality, and quality are not compromised.
4.3.8	Assembly or other activities undertaken on site involving the direct handling of the product shall take place in areas that have, as a minimum, the same standards as manufacturing areas.
4.3.9	Activities that could result in a contamination risk, such as the removal of outer packing, shall be carried out in a designated, segregated area.

4.4 Building interiors

Statement of intent	**Buildings and facilities shall be suitable for the intended purpose and shall be constructed, maintained and monitored to effectively control the risk of product contamination and damage.**
Clause no.	BRCGS proposed wording
4.4.1	Walls shall be finished and maintained in good condition to minimise the accumulation of dirt and facilitate cleaning.
4.4.2	Doors shall be maintained in good condition.

	External doors and dock levellers shall be close-fitting, or adequately proofed. Where external doors to exposed product manufacturing areas are present, suitable precautions shall be taken to prevent pest ingress.
4..4.3	Ceilings and overhead structures shall be constructed, finished and maintained to prevent the risk of product contamination. Where suspended ceilings exist, they shall be accessible for cleaning and inspection for pests unless the void is fully sealed.
4.4.4	Floors shall be suitably hard-wearing to meet the demands of the operations and withstand cleaning materials and methods. They shall be maintained in good repair and facilitate cleaning.
4.4.5	Where they constitute a risk to product, and based on the likelihood and risk of contamination, windows and roof glazing shall be protected against breakage.
4..4.6	Where they constitute a risk to product and based on the likelihood and risk of glass contamination, all bulbs and strip lights, including those on flying-insect control devices, shall be adequately protected.
4.4.7	Suitable and sufficient lighting shall be provided to enable effective operations, cleaning and inspection of the product.
4..4.8	Suitable and sufficient ventilation to prevent condensation, excessive dust, heat and fumes where applicable, shall be provided.
4.4.9	The site shall implement and control any specific requirements relevant to the products being manufactured such as temperature, humidity and electrostatic discharge.
4.4.10	Based on risk, where elevated walkways, access steps, or mezzanine floors are adjacent to, or pass over manufacturing lines, they shall be: • designed to prevent contamination of products and manufacturing lines • easy to clean • appropriately maintained.

4.5 Utilities

Statement of intent	**All utilities within the manufacturing and storage areas shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.**
Clause no.	BRCGS proposed wording
4.5.1	All water used in the manufacturing operations that could impact product safety shall be suitable for the intended use, adequately stored and be, where appropriate, potable or suitably treated to prevent contamination and regularly monitored. Where required, the site shall comply with local legislation on water quality. Where water is not intended for use in manufacturing operations, systems shall be in place to minimise risks to product safety.

4.5.2	A schematic diagram shall be available of the water distribution system on site. This shall include the water source, holding tanks, water treatment and water recycling.
4.5.3	Based on risk assessment, the microbiological and/or chemical quality of steam, ice, air, and compressed gases which come or could come into direct contact with product shall be specified as suitable for the intended use or regularly monitored. These shall present no risk to product safety or quality and shall comply with relevant local legislation.

4.6 Housekeeping and hygiene

Statement of intent	**FUNDAMENTAL** **Systems shall be in place which ensure that appropriate standards of equipment and environment housekeeping and cleaning are maintained and that the risk of product contamination is minimised.**
Clause no.	BRCGS proposed wording
4.6.1	Standards of housekeeping and hygiene appropriate to the products shall be maintained and include manufacturing, machinery and equipment, storage, and ancillary areas such as engineering workshops and laboratories. Cleaning practices shall be completed to minimise risk of contamination.
4.6.2	Cleaning equipment and facilities shall be fit for purpose, maintained in a suitable condition, cleaned and stored in a hygienic manner to prevent contamination, and stored in a designated location.
4.6.3	Materials and equipment used for cleaning toilets shall be differentiated from those used elsewhere and physically segregated where necessary.
4.6.4	Suitable cleaning chemicals shall be identified, clearly labelled and controlled to prevent the risk of product contamination. Chemicals shall not be decanted unless into properly labelled and identified containers. Adequate storage facilities shall be provided and sited so as not to compromise the safety, legality and quality of the product.
4.6.5	If cleaning services are outsourced, the service providers shall have signed a contract which identifies the scope and frequency of the work, and records shall be maintained (as per clause 3.7.2). A defined site representative shall be responsible for ensuring that the work is carried out satisfactorily.
4.6.6	Cleaning procedures shall be in place and maintained for buildings, equipment and vehicles. Cleaning schedules and procedures shall include the following information: • responsibility for cleaning • item/area to be cleaned • frequency of cleaning • method of cleaning • cleaning materials to be used • cleaning records and responsibility for monitoring.

	• methods of verification. The frequency and methods of cleaning shall be based on risk. The procedures shall be implemented to ensure that appropriate standards of cleaning are achieved. Cleaning activities shall not pose a risk to product safety.
4.6.7	Where cleaning and sanitation procedures are part of a defined prerequisite plan to control the risk of a specific hazard, the procedures and frequencies shall be validated and records maintained.
4.6.8	Where the site uses cleaning-in-place equipment it shall be designed, validated and managed so that it does not present a risk of contamination.

4.7 Waste and waste disposal

Statement of intent	**Waste materials and their disposal shall be managed in accordance with legal requirements and to prevent accumulation, risk of cross contamination and the attraction of pests.**
Clause no.	BRCGS proposed wording
4.7.1	Where legally necessary, waste shall be removed by identified, licensed contractors, and records of disposal shall be maintained by the site.
4.7.2	Waste materials shall be controlled, clearly labelled and where necessary quarantined to ensure that they are not reintroduced into non-waste manufacturing flows.
4.7.3	Internal and external waste collection containers shall be identifiable, suitable and sufficient. They shall be emptied at appropriate frequencies and maintained in a clean condition. External storage of waste shall be in designated areas and designed and maintained to minimise the risk of pest harbourage.
4.7.4	Where appropriate, waste shall be categorised and disposed of according to legislative requirements.
4.7.5	Substandard trademarked materials shall be rendered unusable (unless otherwise agreed with customer) through a destructive process or transferred to a third party for destruction or disposal. The third party shall be a specialist in appropriate waste disposal and shall provide records of material destruction.

4.8 Pest management

Statement of intent	The site shall have an effective preventive pest management programme in place to minimise the risk of infestation and risk to products and the resources available to respond immediately to any issues which occur.
Clause no.	BRCGS proposed wording
4.8.1	A preventive pest management programme shall be maintained, covering all areas of the site.

	This shall be based on a documented risk assessment which should include the material, component, packaging, finished product, process, location, type of premises, and the types of pests. The site shall assess the suitability of its pest management programme to address variation in pest activity through different seasons and consider any additional preventive activity required. The site shall document and implement any required additional activities.
4.8.2	The site shall either contract the services of a competent pest management organisation or have appropriately trained personnel for the regular inspection and treatment of the site to deter and eradicate infestation. The frequency of inspections shall be determined by risk assessment and documented. The risk assessment shall be reviewed whenever: • there are changes to the building or manufacturing processes which could have an impact on the pest management programme • there has been a significant pest issue. Where the services of a pest management contractor are employed, the service contract shall be clearly defined and reflect the activities of the site and meet all applicable regulatory and customer requirements.
4.8.3	Where a site undertakes its own pest management, it shall be able to demonstrate that: • pest management operations are undertaken by trained and competent personnel with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the pests associated with the site • personnel undertaking pest management activities meet any legal requirements for training or registration • sufficient resources are available to respond to any infestation issues • there is ready access to specialist technical knowledge when required • legislation governing the use of pest control products is understood and complied with.
4.8.4	Equipment such as bait stations, traps or electric fly-killing devices shall be appropriately located, secured, tamper proof and operational. Toxic baits or chemicals shall not be used where there is an identified risk to exposed product except when treating an active infestation. Baits or chemicals shall be used in accordance with local legislative requirements. Where pest control products are stored on site, dedicated locked facilities shall be used.
4.8.5	When necessary, materials or products shall be fumigated, and records of this process shall be kept. Fumigated goods may not be supplied to customers without full professional safety clearance and correct clearance documentation. All fumigation operations shall be controlled by personnel with appropriate professional qualifications and/or training, and in accordance with applicable regulatory and customer requirements.

4.8.6	Effective precautions shall be in place to prevent pests entering the premises. The building shall be suitably proofed against the entry of all pests via doors, windows, ducts, drains and cable entry points. This shall include measures to prevent birds and flying mammals from entering buildings or roosting above loading or unloading areas.
4.8.7	In the event of infestation, immediate action shall be taken to eliminate the hazard. Action shall be taken to identify, evaluate the potential for contamination or damage, and where needed to apply additional controls to ensure that only authorised/assessed product is released.
4.8.8	Procedures and detailed records of pest activity, pest management inspections and recommendations shall be maintained. These may include: • an up-to-date, signed and authorised site plan identifying numbered pest control devices and their locations • identification of the baits and/or monitoring devices on site • clearly defined responsibilities for the site management and the contractor • details of pest control products used and instructions for their effective use • detailed records of inspections, recommendations and of any pest infestation. It shall be the responsibility of the site to ensure that all the relevant recommendations made by the contractor or in-house expert are implemented in a timely manner and monitored for efficacy.
4.8.9	Personnel shall understand the signs of pest activity and be aware of the need to report any evidence to a designated person.

4.9 Equipment and equipment maintenance

Statement of intent	**All manufacturing and product handling equipment shall be suitable for the intended purpose, and an effective maintenance programme shall be in operation to prevent the risk of contamination and damage and reduce the potential for breakdowns.**
Clause no.	BRCGS proposed wording
4.9.1	All equipment shall be fit for purpose and constructed of appropriate materials. The design and placement of equipment shall ensure it can be effectively cleaned and maintained.
4.9.2	In the case of equipment failure, procedures shall be in place to establish the safety and legal status of the product manufactured prior to release.
4.9.3	A programme of maintenance shall be in place to prevent contamination and reduce the risk of breakdown. The programme shall cover all items of manufacturing and service equipment essential to product safety, legality and quality.

	Maintenance records shall be retained.
4.9.4	In addition to any planned maintenance programme, where there is a risk of product contamination by foreign bodies arising from equipment failure or damage, the equipment shall be inspected at predetermined intervals, inspection results documented, and appropriate action taken.
4.9.5	Materials (e.g. chemicals, lubricating oils, nuts, bolts, washers, paints, etc) used for equipment maintenance shall be assessed to establish whether they pose a risk by direct or indirect contact with materials, work in progress, components, packaging and finished products. If necessary, they shall be suitably identified for the intended use and controlled.
4.9.6	Repair and/or servicing of equipment shall be completed by competent maintenance personnel.
4.9.7	Maintenance work shall not place product safety, legality or quality at risk. Maintenance work shall be followed by a clearance inspection which records that contamination hazards have been removed and equipment is cleared to resume manufacturing. Tools and other maintenance equipment shall be cleared away after use and appropriately stored.
4.9.8	Where temporary repairs and modifications are made, these shall be documented and controlled to ensure that the product safety, legality or quality is not at risk. These temporary measures shall be permanently repaired as soon as practicable and within a defined timescale.
4.9.9	Engineering workshops/areas shall be kept clean and tidy, and controls shall be in place to prevent transfer of engineering debris to manufacturing or storage areas (e.g. by provision of swarf (debris) trap mats).

4.10 Product contamination control

Statement of intent	**Procedures shall be in place to control the risk of product contamination.**

4.10.1 Chemical control

Clause no.	BRCGS proposed wording
4.10.1.1	Procedures shall be in place to manage the use, storage and handling of chemicals not used in the manufacturing process, such as lubricants and cleaning chemicals, to prevent product contamination. These shall include, as a minimum: • a register of approved chemicals for purchase, such as lubricants, chemicals • confirmation of suitability • use in accordance with manufacturer's instructions • availability of material safety data sheets and specifications • avoidance of strongly scented products, where potential risks of taint to the product may occur

	• the labelling and/or identification of containers of chemicals at all times • designated storage with access restricted to authorised personnel • procedures to manage any spills • use by trained personnel only • disposal of obsolete, out of date chemicals and empty chemical containers.

4.10.2 Sharps and metal control

Clause no.	BRCGS proposed wording
4.10.2.1	There shall be a procedure for the controlled use and storage of sharp implements, including knives, blades, needles and wires, to prevent product contamination. The procedure shall include: • issue and control of sharp implements in the manufacturing, storage and ancillary areas, such as engineering workshops and laboratories and those issued to homeworkers • recovery of all parts of broken needles before the issue of a replacement needle (where appropriate). • record of replacement or breakage. Snap-off blade knives shall not be used.
4.10.2.2	Staples, paper clips and drawing pins shall not be used in exposed product areas. Where staples or other items are present as packaging materials or closures, appropriate precautions shall be taken to minimise the risk of product contamination.

4.10.3 Glass and brittle materials control

Clause no.	BRCGS proposed wording
4.10.3.1	Glass or other brittle materials shall be excluded or protected against breakage in areas where there is a risk of product contamination. Systems for cleaning or replacing glass and brittle material items shall be in place to minimise the potential for product contamination.
4.10.3.2	Glass or other brittle materials that pose a potential product contamination hazard shall be controlled and recorded on a register that includes, as a minimum: • a list of items detailing location, number, type and condition • recorded checks of condition of items, carried out at a specified frequency that is based on the level of risk to the product. Glass or brittle materials not in the manufacturing or storage areas shall be included in the register based on risk.
4.10.3.3	Where a glass or brittle materials breakage occurs, an authorised person shall be placed in charge of the clean-up operation and shall ensure that no

	other area or product is allowed to become contaminated due to the breakage. Any product that has become contaminated shall be segregated and disposed of. All breakages shall be recorded in an incident report.

4.10.4 Other physical contaminants

Clause no.	BRCGS proposed wording
4.10.4.1	Notices and document holders located on or near equipment shall be secure and not pose a risk to product contamination.
4.10.4.2	Where it poses a risk to product, wooden equipment (e.g. desks, chairs, tables, etc.) shall be properly sealed to enable effective cleaning. This equipment shall be kept clean, in good condition and free from splinters or other sources of physical contamination. Where wood is used as packaging or a component, then this shall not pose any additional risk of contamination to the product.
4.10.4.3	Procedures shall be in place to prevent physical contamination of the materials, components or finished products from packaging during de-boxing or debagging processes.
4.10.4.4	Site issued portable handheld equipment, e.g., mobile phones, cameras, tablets, pens, measuring equipment and similar portable items, shall be controlled by the site to minimise the risk of physical contamination.
4.10.4.5	Based on risk, procedures shall be implemented to minimise other types of contamination (i.e., types of contamination that are not specifically covered elsewhere in section 4.10).

4.11 Foreign body detection and removal equipment

Statement of intent	**The risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies.**

4.11.1 Selection and operation of foreign-body detection and removal equipment

Clause no.	BRCGS proposed wording
4.11.1.1	A documented assessment in association with the HARA plan (see section 2) shall be carried out on each manufacturing process to identify the potential use of equipment to detect or remove foreign-body contamination. Typical equipment to be considered may include: • filters and sieves • metal detection and X-ray detection equipment • magnets and optical sorting equipment.
4.11.1.2	The type, location and sensitivity of the detection and/or removal method shall be specified as part of the site's documented system.

	Industry best practice shall be applied with regard to the nature of the material, components, packaging and product. The location of the equipment or any other factors influencing the sensitivity of the equipment shall be validated and justified.
4.11.1.3	The site shall ensure that the frequency of the testing of the foreign body detection and/or removal equipment is defined and takes into consideration: • specific customer requirements • the site's ability to identify, hold and prevent the release of any affected materials, should the equipment fail. The site shall establish and implement corrective action and reporting procedures in the event of a failure of the foreign body detector and/or removal equipment. Action shall include a combination of isolation, quarantining and re-inspection of all products produced since the last successful test or inspection.
4.11.1.4	Where foreign material is detected or removed by the equipment, the source of any foreign material shall be investigated. Information on rejected materials shall be used to identify trends and, where possible, instigate preventive action to reduce the occurrence of contamination by the foreign material.

4.11.2 Filters and sieves

Clause no.	BRCGS proposed wording
4.11.2.1	Filters and sieves used for foreign body control shall be of a specified mesh size or gauge and designed to provide the maximum protection that is practical for the product. Material retained or removed by the system shall be examined and recorded to identify risks.
4.11.2.2	Filters and sieves shall be regularly inspected and tested for damage at a documented frequency determined by the HARA plan. Defective filters and sieves shall be segregated and appropriate action taken to maintain control e.g. replacement. Records shall be maintained.

4.11.3 Metal detectors and X-ray equipment

Clause no.	BRCGS proposed wording
4.11.3.1	Where it is required the metal detector or X-ray equipment shall incorporate one of the following: • an automatic rejection device • a belt stop system with an alarm where the product cannot be automatically rejected (e.g. for very large packs)

	• in-line detectors which identify the location of the contaminant to allow effective segregation of the affected product.
4.11.3.2	Systems shall be in place to segregate any product rejected to prevent accidental reintroduction and allow investigation of the source of the contaminant.

4.11.4 Magnets and optical sorting equipment

Clause no.	BRCGS proposed wording
4.11.4.1	The type, location and strength of magnets shall be recorded. Procedures shall be in place for inspection, cleaning, strength testing and integrity checks. Records of all checks shall be maintained.
4.11.4.2	The effectiveness of optical sorting equipment shall be checked according to the HARA plan and in conjunction with the manufacturer's instructions or recommendations. Records of all checks shall be maintained.

4.11.5 Container cleaning equipment

Clause no.	BRCGS proposed wording
4.11.5.1	The effectiveness of any container-cleaning equipment shall be checked according to the HARA plan. Where the equipment incorporates a reject system the checks shall test both the detection and the effective rejection. Records of all checks shall be maintained.

4.12 Allergen and sensitising materials management

Clause no.	BRCGS proposed wording
4.12.1	Where a potential for contamination from allergen or intrinsic allergenic and sensitising materials has been identified as part of the product risk assessment (clause 2.1.1), the site shall establish, implement, and maintain a management plan. This plan shall minimise or eliminate the risk of contamination to and/or from the material, component, packaging and product. The plan shall meet legal requirements for their intended use and labelling in the country of supply. The plan shall be reviewed based on risk, such as changes to manufacturing operations, materials, components and chemicals such as cleaning agents and lubricants.

4.12.2	Controls shall be established and implemented to eliminate or reduce the identified risk, through personnel training, material, component, segregation and handling.

Section 5: Product and process control

5.1 Control and acceptance of incoming materials, components and packaging materials

Clause no.	BRCGS proposed wording
Statement of intent	**FUNDAMENTAL** **The site shall have an effective process to ensure that incoming materials, components and packaging materials are suitable for use and do not adversely affect the safety, legality or quality of the finished product.**
5.1.1	A material, component, and packaging intake procedure shall be in place to ensure that incoming goods conform to purchase and/ or product specifications. Acceptance criteria for incoming goods shall be defined. These may include the need to retain samples for testing, the review of certificates of analysis, statements of compliance or certificates of conformance, checking purchase orders and delivery notes. All materials awaiting the results of testing or verification of data, shall be held until released for use. Where there is a requirement for positive batch release of incoming goods these shall be subject to a batch release procedure. This includes materials returned to site from outsourced processors, including home workers.
5.1.2	There shall be a procedure for the inspection of incoming goods on arrival to ensure that products are free from pest infestation, contamination or damage and are in a satisfactory condition. Defects identified by the site shall be reviewed as defined in clause 3.10. Unloading areas including silos for bulk deliveries shall be secured, clearly identified and designed to prevent material cross-contamination. Where incoming vehicles are equipped with transfer hoses and pumps for the unloading of tankers, these shall be in good condition and secured when not in use.
5.1.3	Receipt documents and/or product identification shall facilitate correct stock rotation and, where appropriate, ensure materials are used in the correct order and within the prescribed shelf life - e.g. first in first out (FIFO) and first expiry first out (FEFO).
5.1.4	The site shall have a procedure to ensure that materials, components and packaging used by home workers are approved prior to issue.
5.1.5	Before releasing to manufacture, the site shall have a mechanism in place to confirm that all materials, components, work in progress, and packaging are correct and meet specifications.

5.2 Product vulnerability

Product vulnerability refers to weaknesses or flaws in the supply chain that can be exploited, potentially compromising its integrity, functionality, or user trust.

A vulnerability assessment is a tool to identify potential weaknesses in the supply chain to prevent fraudulent activity (such as the substitution, adulteration or misrepresentation of materials) before they arrive at the site. It is a specialised form of risk assessment.

The aim of the assessment is not to assess the potential for fraud at the site, but to examine the supply chain for concerns or weaknesses.

An effective vulnerability assessment involves identifying, assessing, and mitigating these vulnerabilities to minimise risks. This process typically includes:

- Identifying vulnerabilities: understanding historical issues and the regular scanning and monitoring of the supply chain for potential weaknesses and vulnerabilities.
- Assessing risks: evaluating the potential impact of identified weakness and vulnerabilities.
- Mitigation: implementing actions to reduce the risks associated with the identified weaknesses and vulnerabilities.

Clauses 5.2.1 and 5.2.2 are auditable from 5 April 2028.

Statement of intent	**Systems shall be in place to minimise the risk of purchasing or use of fraudulent or adulterated materials, components and packaging and to ensure that all product descriptions and any claims are legal, accurate and verified.**
Clause no.	BRCGS proposed wording
5.2.1	The site shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of adulteration, substitution or misrepresentation of materials, components and packaging. Examples of where information may come from include: • trade associations • government sources • private resource centres.
5.2.2	A documented vulnerability assessment shall be carried out on all materials, components and packaging (either individually or in groups) to assess the potential risk of substitution, adulteration or misrepresentation. This shall take into account: • historical evidence • economic factors which may make fraudulent activity more attractive • ease of access through the supply chain • sophistication of routine testing • physical form of the material • confidence in the supplier • adverse impact on the end user of the final product. Personnel involved in the vulnerability assessments should understand potential fraud risks. The output from this assessment shall be a documented vulnerability assessment plan. This plan shall be kept under review to reflect changing

	economic circumstances and market intelligence which may alter the potential risks. It shall be formally reviewed annually.
5.2.3	Where claims are made about the methods of manufacture, the site shall maintain the necessary certification status to support such a claim e.g. FSC, organic textiles.

5.3 Product inspection and laboratory testing

Clause no.	BRCGS proposed wording
Statement of intent	**FUNDAMENTAL** **The site shall undertake appropriate inspections and testing to ensure that products are safe, legal and of the agreed quality, meeting customer requirements.**
5.3.1	There shall be a risk-based schedule for product-testing, for each product or product group. This shall be based on information such as: • the outcome of the product assessments • the outcome of the hazard analysis and risk assessments • any legal requirements for testing in the regions(s) of intended supply • the manufacture of safe products • customer requirements. The methods, frequency and specified limits of testing shall be defined.
5.3.2	Product testing procedures shall be in place and carried out at appropriate stages during manufacturing to demonstrate that the finished product meets the agreed product specification. These procedures shall include: • frequency of product inspection or testing, and sample quantity, in accordance with industry-accepted practice or customer requirements, and based on risk • identification of authorised, trained and demonstrably competent personnel carrying out the product inspection or testing • records of results of product inspection or testing • review of the results to identify their significance and to enable action to be taken accordingly • how samples used for product inspection or testing are managed.
5.3.3	Where testing ensuring product safety or legality is undertaken, the internal or external testing facility and methods used shall have gained recognised accreditation or operate in accordance with the requirements and principles of ISO/IEC17025, including competency testing where applicable. Documented justification shall be available where accredited methods or reference methods are not undertaken. The significance of the results shall be understood and acted upon.
5.3.4	Procedures shall be in place to ensure reliability of test results other than those ensuring product safety and legality. These shall include:

	• use of recognised test methods and reference standards, where available • documented testing procedures • ensuring personnel are suitably qualified and/or trained and competent to carry out the testing required • use of a system to verify the accuracy of test results (e.g. ring or proficiency testing) • use of appropriately calibrated and maintained testing and inspection equipment.
5.3.5	Where testing is submitted to third parties, the required testing shall be clearly defined, including reference to the correct version of the test standard or method to be used. In cases where the site relies on the expertise of third-party organisations to determine appropriate test requirements, the site shall ensure that information regarding the purpose of the test and that the testing programme is formally agreed and documented.
5.3.6	Where inspection or testing equipment is integrated into the manufacturing operations and is ensuring product safety, legality and quality in line with customer requirements, the site shall establish and implement procedures for the operation and testing of the equipment. The procedures shall ensure that equipment is correctly set up and capable of alerting, rejecting or identifying when the product is out-of-specification. Where appropriate, verification of accuracy and effectiveness of the equipment shall be completed at: • the start and end of manufacturing run • a frequency based on the site's ability to identify, hold and prevent the release of any implicated products should the equipment fail • a frequency based on equipment manufacturer's recommendation.
5.3.7	Inspection and testing procedures and customer approved reference samples (where required) shall be of the most recent version and be available.

5.4 Quantity control

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall operate a quantity control system which conforms to the legal requirements in the country where the product is supplied and any additional customer requirements.**
5.4.1	Where the site supplies finished product by quantity, a quantity control system shall be in place. This shall meet the requirements of the appropriate legislation governing quantity or the specified customer requirements in the region where the product is supplied. A record of quantity checks shall be maintained.

5.4.2	The quantity of product shall match the quantity markings, which should be accurate, and in accordance with the legal requirements in the country of supply and customer requirements.

5.5 Manufacturing product sample control

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall ensure that procedures are in place for the selection, handling, storage, approval and use of reference samples in accordance with legal and customer requirements.**
5.5.1	Where legally required or specified by a customer, an approved sample of the product of the agreed specification shall be retained. The site shall have a procedure to identify, select and categorise reference samples including those generated during product development or following any changes. Where customers have a requirement for sealed samples referring to different stages of sample approval, the customer's procedure shall be documented and followed.
5.5.2	The need for a secure and tamper-evident system for the storage and tracking of samples kept on site shall be determined based on: • risk assessment • customer needs • legal requirements Access shall be given to authorised personnel. Samples shall be held in suitable environmental conditions to maintain their original status for a specified period. Records shall be retained. The removal and return of samples to storage shall be documented and authorised by a designated responsible person.
5.5.3	Procedures shall be in place to determine the retention time for samples. This should normally be the foreseeable lifetime of the product unless otherwise justified. Retained obsolete samples shall be disposed of securely.

5.6 Manufacturing process control

Statement of intent	**FUNDAMENTAL** **Procedures, work instructions and specifications shall be in place to ensure effective compliance with product safety, legality, quality and customer requirements throughout the manufacturing operations.**
Clause no.	BRCGS proposed wording
5.6.1.1	The site shall identify manufacturing process control points that can prevent or limit the risk of producing products with quality defects.

	For each manufacturing process control point, control limits shall be established and documented.
5.6.1.2	A bill of materials and/or manufacturing instructions shall be available for each batch or lot during manufacturing.
5.6.1.3	All documentation, materials, components and packaging along with the necessary equipment shall be available for use at the start of manufacturing operation. It shall be possible for traceability purposes to identify the manufacturing equipment or line using an identifying code.
5.6.1.4	Manufacturing process checks shall be undertaken and recorded at start-up, end, following adjustments to equipment and periodically based on risk during manufacturing, to ensure products are consistently produced to the agreed manufacturing instruction.
5.6.1.5	In the event of equipment failure, or deviation of the process from the manufacturing instructions, procedures shall be in place to establish the status of the product and determine the action to be taken in accordance with section 3.10.
5.6.1.6	Where appropriate, or as a customer requirement, identifiable and traceable manufacturing samples of product shall be retained for a defined period.
5.6.1.7	Where a site handles products, materials or areas on site that are outside the scope of the certification, these shall be controlled to ensure they do not create a product safety, legality, or quality risk to products within scope.

5.6.2 Line clearance

Clause no.	BRCGS proposed wording
5.6.2.1	A manufacturing line clearance procedure shall be in place and fully implemented. The procedure shall ensure that at start-up and prior to any changeover, all manufacturing equipment and the surrounding areas have been cleared and, where necessary, cleaned to avoid the mixing of materials and components from the previous operations. The line shall be clear of all previous: • materials, components, work in progress manufacturing documentation. The line clearance shall be recorded and include as a minimum: • personnel involved • confirmation that the line clearance was completed • sign off for continuing manufacturing.

5.7 Storage facilities

Clause no.	BRCGS proposed wording
Statement of intent	**All facilities used for the storage of materials, components, packaging, work in progress and finished products shall minimise the risk of contamination, damage, or malicious intervention, and ensure product safety, legality and quality.**
5.7.1	Procedures to maintain product safety, legality and quality during storage shall be risk-based, understood by the relevant personnel, and implemented accordingly.
5.7.2	Systems shall be in place to ensure materials, components, packaging, work in progress and finished products are maintained in good condition, properly identified and protected from contamination, deterioration and damage. Based on risk, they shall include: • appropriate packaging to protect product • segregation of products where necessary • storage off the floor and away from walls • specific handling or stacking requirements.
5.7.3	Storage, including off-site storage and storage outside, shall be controlled to prevent contamination, damage and malicious intervention. Where off-site storage is used, the same site standards apply as for on-site storage. Where materials have been stored outside, they shall be inspected prior to entry to internal areas.
5.7.4	Where controlled environment storage is required, e.g. temperature, humidity, the storage conditions shall be specified and effectively controlled and monitored.
5.7.5	The site shall ensure effective stock rotation of materials, components, work in progress and finished products in storage e.g. FIFO or FEFO.

5.8 Calibration and control of measuring and monitoring devices

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall be able to demonstrate that measuring and monitoring equipment is sufficiently accurate and reliable to provide confidence in measurement results.**
5.8.1	The site shall identify, and control in-line and off-line measuring equipment used to monitor product safety, legality and quality in line with customer requirements. This shall include, as a minimum: • a documented list of equipment and its location • an identification code and re-calibration due date, where applicable • the calibration date, and any adjustments required • prevention from adjustment by unauthorised personnel • protection from damage, deterioration and misuse.

5.8.2	The accuracy and precision of measuring equipment shall be specified (with permitted tolerances) to the product parameter being controlled.
5.8.3	All identified measuring equipment shall be monitored and adjusted at a predetermined frequency, based on risk. Adjustment of identified equipment by unauthorised personnel shall be prevented. All results shall be recorded.
5.8.4	Where appropriate, reference measuring equipment shall be calibrated and traceable to a recognised national or international standard and records maintained. Where such a standard does not exist, the basis by which calibration is carried out shall be documented. The uncertainty of calibration shall be considered when equipment is used to assess limits.
5.8.5	Procedures shall be in place to record actions taken when a failure of the equipment used for product inspection, testing or measuring is identified. Any such failures shall be subject to an assessment of potential risk to the product. Where the safety, legality or quality of the product is based on equipment found to be inaccurate, action shall be taken to ensure at-risk product is not released.

5.9 Finished product packing and control

Statement of intent	**The site shall ensure that finished products are packed into packaging in accordance with customer-specified requirements and any relevant product safety legality and quality requirements.**
Clause no.	BRCGS proposed wording
5.9.1	Before the start of the packing operation, and following any change of product, documented checks shall be carried out to ensure: • the packing line and the relevant areas around it have been cleared, and where necessary cleaned • all previous products have been removed. All documentation and packaging materials shall be available for use at the packing line. The packing line being used shall be identifiable by its name or identifying code.
5.9.2	The site shall have systems in place to ensure that products are placed in the correct packaging. Documented checks shall be retained.

5.10 Product release

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall ensure that finished product is not released unless all agreed procedures have been followed.**
5.10.1	A procedure shall be in place to ensure that only finished products conforming to specification are released for dispatch. Where products require positive release, procedures shall be in place to ensure that release does not occur until all release criteria have been completed and the release has been authorised.
5.10.2	The site shall ensure that all products brought in from outsourced processors including home workers shall be included in the product release procedure.

5.11 Despatch and transport

Statement of intent	**Procedures shall be in place to ensure that the management of dispatch, and of the vehicles and transport containers used for the transport of finished products from the site, are undertaken in a manner that minimises the risk of contamination, damage or malicious intervention and maintains product safety, security, legality and quality.**
Clause no.	BRCGS proposed wording
5.11.1	Procedures to maintain product safety, legality, security and quality during loading and transport shall be implemented. These may include, as appropriate: • requirements for the security of vehicles during transport, particularly when parked and unattended • requirements to protect any products that are vulnerable to weather damage during loading and unloading • securing product to prevent movement during transport • inspection of vehicles and containers prior to dispatch • any restrictions on the use of combined loads.
5.11.2	All vehicles (company owned or leased) and transport containers used for the transport shall be inspected prior to loading to ensure that they are fit for purpose. Records of inspections shall be maintained.
5.11.3	Pallets shall be checked prior to use and be intact, dry, clean and free from damage and contamination. Unacceptable pallets shall not be used.
5.11.4	Where the site employs third-party transport contractors, there shall be a contract or agreed terms and conditions. All the requirements specified in this section shall be clearly defined in the contract or the company shall be

	certificated to the Global Standard Storage and Distribution or equivalent standard. Where this is not possible, with general carriers, the packaging shall be adequate to protect the product against damage, contamination hazards, taint and odour.

Section 6: Personnel

6.1 Training and competence

Clause no.	BRCGS proposed wording
Statement of intent	**FUNDAMENTAL** **The site shall ensure that all personnel performing work that affects product safety, legality and quality are adequately trained, instructed and supervised commensurate with their activity and that they are competent to undertake their job role.**
6.1.1	All relevant personnel, including home workers, temporary personnel and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period. Induction training shall include the site's personal hygiene requirements.
6.1.2	The site shall put in place procedures covering the training needs of all relevant personnel. These shall include, as a minimum: • provide training to ensure personnel have the necessary competencies for specific roles • ensure that training includes both general site information and job specific training • reviewing the effectiveness of training • delivery of training in the appropriate language of trainees.
6.1.3	Where personnel are engaged in monitoring activities relating to product safety, legality and quality specific training and competency assessment shall be in place.
6.1.4	The site shall define how new or changed procedures, working methods and practices relating to product safety, legality and quality are communicated and trained as appropriate to relevant personnel.
6.1.5	Records of all training shall be available. These shall include the: • name of the trainee and confirmation of attendance • date and duration of the training • title and course contents • confirmation of successful completion as appropriate • training provider (external or internal provider). Where training is undertaken by approved service providers on behalf of the site, records of the training shall be available.
6.1.6	The site shall routinely review and document the competencies of all personnel and provide relevant training as appropriate. This may be through training courses, refresher training, coaching, mentoring or on-the-job experience.

6.2 Protective clothing

Clause no.	BRCGS proposed wording
Statement of intent	The site's protective clothing requirements shall be documented and adopted by relevant personnel, contractors and visitors within the manufacturing and storage areas to minimise the risk of product contamination. Where home workers are utilised then the requirement for protective clothing shall be documented and adopted.
6.2.1	The site shall use risk assessment to determine the need for protective clothing, including hair coverings and beard and moustache snood based on the hazards associated with manufacturing and intended use of the finished product. Where risk assessment has determined protective clothing is not required in a particular area or operation, it shall be fully justified and documented. Where a need for protective clothing has been identified the style of clothing adopted shall not pose a product contamination risk.
6.2.2	The site shall define the rules regarding the wearing of protective clothing in all situations, including: • to and from the site • when away from the manufacturing areas (e.g., removal before entering toilets, canteen, ancillary areas, and smoking areas) • changing of protective clothing when moving between areas of different hygiene requirements. (See section 7.)
6.2.3	Where worn, sufficient, site-issued sets of protective clothing shall be provided. It shall be effectively cleaned at an appropriate frequency and provide adequate coverage of personal clothing. Based on risk the protective clothing shall have no external pockets on the upper body garments or sewn-on buttons.
6.2.4	Disposable protective clothing, if used, shall be suitably designed and subject to adequate control to avoid product contamination.
6.2.5	If gloves are used, they shall be replaced regularly, be distinctive (e.g. by colour), intact and not cause a contamination risk to the product.
6.2.6	Storage of clean protective clothing on site shall be controlled to prevent cross-contamination.
6.2.7	Protective clothing shall be laundered. Laundering shall be carried out by one of the following methods: • professional laundry service • site-controlled laundering facilities • home laundry (not permitted for sites identified as requiring additional enhanced hygienic conditions according to section 7).
6.2.8	Where home laundry of protective clothing is permitted, the site shall ensure that personnel have received written instructions regarding the laundering process to be used.

6.3 Personal hygiene

Clause no.	BRCGS proposed wording
Statement of intent	**The site's personal hygiene requirements shall be documented and adopted by relevant personnel, contractors and visitors within the manufacturing and storage areas to minimise the risk of product contamination.** **Where home workers are utilised then the requirements for personal hygiene shall be documented and adopted.**
6.3.1	The requirements for personal hygiene shall be based on risk assessment of the potential hazards that could occur during manufacturing and storage, and appropriate to the intended use of the finished product. The risk assessment shall consider, as a minimum: • wearing of wrist bands, wrist-worn devices or watches • jewellery, including piercings on exposed parts of the body, except for a plain wedding ring, wedding wristband, medical alert jewellery or medical monitoring devices • fingernails including length, hygiene, varnish and false nails • excessive perfume or aftershave, where there is a tainting risk. These requirements shall be documented and communicated to all personnel. Compliance with these requirements shall be checked routinely and records retained.
6.3.2	All cuts and grazes on exposed skin shall be covered by a plaster/band-aid that is issued and monitored by the site.
6.3.3	Where metal/foreign body detection is in place, detectable plasters shall be used and shall be batch tested through the detector.
6.3.4	Hand cleaning shall be performed at a suitable frequency to maintain hygienic conditions.
6.3.5	Eating (including confectionery and chewing of gum or tobacco), drinking and smoking (including electronic cigarettes) shall not be allowed in the manufacturing, storage and other areas, such as laboratory, engineering, locker and changing rooms. If it is impractical for personnel to leave their work area for these purposes, designated, controlled facilities segregated from manufacturing areas shall be provided.

6.4 Personnel facilities

Clause no.	BRCGS proposed wording
Statement of intent	**Personnel facilities shall be sufficient to accommodate the required number of personnel, contractors and visitors and shall be designed and operated to minimise the risk of product contamination.**

	The facilities shall be maintained in a good and clean condition.
6.4.1	Storage facilities of sufficient size to accommodate all reasonable personal items shall be provided for all personnel who work in areas where they are unable to keep possessions with them.
6.4.2	Suitable and sufficient hand cleaning shall be provided at access to manufacturing areas, and at other appropriate points within these areas based on risk.
6.4.3	Suitable and sufficient toilet facilities shall be provided. Toilets shall not open directly into manufacturing and storage areas. Toilets shall be provided with suitable and sufficient hand-washing facilities. Such hand-washing facilities shall provide, as a minimum: • liquid/foam soap • sufficient quantity of water at a suitable temperature to encourage handwashing • suitable hand-drying facilities. Information on how to wash hands shall also be provided near hand-washing points. Where hand-washing facilities within toilets are the only facilities provided before entering manufacturing areas, signs shall be in place to direct personnel to these hand-washing facilities.
6.4.4	All food brought onto site shall be stored in designated areas which is maintained in a clean and hygienic state. Food shall be consumed within designated areas.
6.4.5	Drinking of water may be allowed, provided it is kept away from product and manufacturing equipment.
6.4.6	Where smoking, including electronic cigarettes, is allowed within buildings under national law, designated controlled areas shall be provided. Smoking areas shall be isolated from manufacturing and storage areas and with sufficient extraction to the exterior of the building. Adequate arrangements for dealing with smokers' waste shall be provided at smoking facilities, both inside buildings and at external locations.

6.5 Medical screening

Clause no.	BRCGS proposed wording
Statement of intent	**Sites shall ensure that procedures are in place to ensure that health conditions likely to adversely affect product safety are monitored and controlled.**
6.5.1	Where there is a risk to product safety and legality, the site should have a procedure for personnel (including temporary personnel, visitors and contractor) to notify of any relevant infectious diseases or conditions which they may have been in contact with or be suffering from.

Section 7: Enhanced hygienic conditions

Statement of intent	**The site shall be able to demonstrate that manufacturing facilities and controls are suitable to prevent microbiological contamination of product.**

Following the product risk assessment documented as per clause 2.1.1.3, the site shall confirm that where it produces or assembles products where the manufacturing process, or part of it, requires enhanced hygienic conditions all the relevant requirements of sections 1 to 6 of the Standard must be fulfilled in addition to the requirements of this section.

Enhanced hygienic conditions are a requirement for sites that manufacture products with:

- Specific hygienic manufacturing legislation in relation to microbiological contamination applicable to country of manufacture and supply

  and/or

- Where a risk assessment has identified that finished products can support microbiological growth or survival resulting in potential harm to the consumer.

Additional guidance is detailed in Appendix 2.

7.1 Layout, product flow and segregation

Clause no.	BRCGS proposed wording
7.1.1	A risk assessment shall be completed to determine the areas of the site where materials, components, packaging and finished products can be exposed to microbiological contamination and require these enhanced hygienic controls. The risk assessment shall take into account the potential sources of microbiological contamination and may include: • segregation and management of manufacturing process flow • the transfer of materials, components, packaging, finished products, equipment, personnel and waste both into and out of the enhanced hygiene areas • air flow and air quality e.g. pressure differentials, filtered air • the provision and location of utilities (including drains) • water flow.

7.2 Building interiors

Clause no.	BRCGS proposed wording
7.2.2	The location and flow from drains shall not present a risk of contamination and shall have devices in place to prevent pest entry. Systems shall be in place to prevent back flow of liquid waste from a contaminated area to a clean area.
7.2.3	Where air filtration and/or positive air pressure systems are required relative to the surrounding areas, there shall be sufficient changes of filtered air. The filter specification used, and frequency of air changes shall be documented. The air system shall be monitored (e.g. pressure differential control) and records retained.

7.3 Utilities

Clause no	BRCGS proposed wording
7.3.1	All water used as an ingredient shall be suitably treated, stored and handled to prevent microbiological contamination, and shall be regularly monitored. Records shall be retained.
7.3.2	Where on site water treatment is required, the treatment process shall be designed, validated and controlled to ensure that the water used meets the required specification.

7.4 Equipment

Clause no	BRCGS proposed wording
7.4.1	Where wooden equipment may pose a risk of microbiological contamination it shall be eliminated from enhanced hygiene areas.

7.5 Personnel facilities

Clause no.	BRCGS proposed wording
7.5.1	Where specific protective clothing is required for the enhanced hygiene areas, designated changing facilities shall be provided for all personnel including visitors and contractors. These shall be sited to allow direct access to the manufacturing, packing or storage areas without the need to pass through any area external to the enhanced hygiene area whether inside or outside the buildings. Where this is not possible, a risk assessment shall be carried out and procedures implemented accordingly.
7.5.2	The changing facilities shall incorporate the following: • clear instructions for the order of changing into and out of dedicated protective clothing • an effective control of footwear to prevent the introduction of microbiological contamination into the area.
7.5.3	Outdoor clothing and other personal items shall be stored separately from protective clothing within the changing facilities.
7.5.4	Suitable and sufficient hand-washing facilities shall be provided at entry to the enhanced hygiene areas. Such hand-washing facilities shall provide, as a minimum: • liquid/foam soap • sufficient quantity of water at a suitable temperature to encourage handwashing • suitable hand-drying facilities. Information on how to wash hands shall also be provided near hand-washing points.

	Hand cleaning/sanitising shall be provided at other appropriate/ relevant points within enhanced hygiene areas.

7.6 Housekeeping, hygiene and sanitation

Clause no	BRCGS proposed wording
7.6.1	Cleaning and sanitation procedures for exposed product contact surfaces and equipment shall be validated to ensure they can achieve the required hygienic standards.
7.6.2	Cleaning procedures shall be revalidated whenever changes are planned to be made to building interiors, equipment, maintenance activities or as part of new product introductions.
7.6.3	The effectiveness of cleaning and sanitation shall be monitored, verified and documented. Corrective actions shall be documented.
7.6.4	Equipment used for cleaning shall be: • visually distinctive and dedicated for use in the enhanced hygiene areas • cleaned and stored in a hygienic manner in designated locations to prevent microbiological contamination (for example, storing equipment off the floor).

7.7 Protective clothing

Clause no	BRCGS proposed wording
7.7.1	Protective clothing shall be provided for all personnel including visitors and contractors entering the enhanced hygiene areas. Protective clothing shall be visually distinct from that worn in other areas and shall not be worn outside the enhanced hygiene areas. Protective clothing shall be provided in sufficient quantities.
7.7.2	Protective clothing shall be changed at an appropriate frequency, based on risk.
7.7.3	Laundering of reusable protective clothing shall be done by an approved contracted or in-house laundry using defined criteria to validate the effectiveness of the laundering process.

7.8 Personal hygiene

Clause no	BRCGS proposed wording
7.8.1	Hands shall be washed on entry to the enhanced hygiene areas and thereafter cleaned/sanitised at a frequency that is appropriate to minimise the risk of microbiological contamination.
7.8.2	The site shall have a procedure ensuring that: • wrist bands, wrist-worn devices or watches are not permitted

	• jewellery, including piercings on exposed parts of the body, are not permitted except for a plain wedding ring, wedding wristband, medical alert jewellery or medical monitoring devices • fingernails are kept short, clean and unvarnished • false fingernails are not permitted. These requirements shall be documented and communicated to all personnel.

Section 8: Traded products

Traded products are defined as any site purchased products that would normally fall within the scope of the Standard and are stored at the site being audited, but are not manufactured, reworked, or packed at that site.

Intercompany/site product movements are not considered as traded products, as these are not normally purchased by the site receiving, storing and despatching the goods.

The site's management of traded products is covered by the requirements in this section.

All the relevant requirements from sections 1 to 6 and 7 where applicable must also be fulfilled in addition to the requirements outlined in this section.

Where a site wishes to be audited against this section of the standard, all the products traded must be included in the audit scope. It is not permitted to include some traded products or materials and exclude others.

Non-conformities against clauses within this section of the standard will be recorded on the audit report and included in the calculation of the site's grade.

Where a site has traded products on site but wishes all of them to be excluded from the scope of the audit, this will be recorded as an exclusion from scope on the audit report and certificate. The BRCGS Consumer Products logo can be used, but shall not be used for promoting traded products, even when included in the certificated scope.

8.1 Hazard analysis and risk assessment

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall operate a HARA plan for the operations for which it is responsible.**
8.1.1	The site shall either: • have a HARA plan specifically for the traded products handled on site or • incorporate the traded products into its existing HARA (see section 2). The scope of the traded products HARA plan shall include the products and the processes for which the site is responsible, and shall include receipt, storage and dispatch.

8.2 Approval and performance monitoring of manufacturers/packers

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall operate procedures for approval of the last manufacturer/packer of traded products to ensure that products traded are safe, legal and manufactured in accordance with any defined product specifications.**
8.2.1	The site shall conduct a risk assessment of the products traded, that considers: • the nature of the product and associated risks • customer-specific requirements • legislative requirements in the country of supply or importation of the product

	• the brand identity of the products.

8.2.2	The approval procedure of manufacturing sites of traded products shall be based on risk and include either one or a combination of the following:
	• certification to a globally recognised product safety or quality management system that incorporates an assessment of traceability and confirmation that products supplied are safe and legal, e.g. declaration of compliance. The scope of certification shall include the traded products purchased.
	• supplier audits, with a scope to include a review of the product safety and quality system, traceability, prerequisite controls, undertaken by an experienced and demonstrably competent product safety auditor. A full audit report shall be available. Where the supplier audit is completed by a second- or third-party, the site shall be able to:
	  • demonstrate the competency of the auditor
	  • confirm that the scope of the audit includes a review of the product safety system, traceability, and prerequisite controls
	  • obtain, review and approve a copy of the full audit report.
	• supplier self-audit questionnaire or supplier-provided information may be used for approval where a valid risk-based justification is provided. The questionnaire shall have a scope that includes the product safety and quality system for the product supplied, verification of the traceability system, and prerequisite controls, and it shall be reviewed and approved by a demonstrably competent person.
	• certificate of analysis – relevant to the products traded supplied, where appropriate and based on risk.
	Where approval cannot be based on the above, then the site shall be able to demonstrate their criteria for approval and evaluation of the supplier to ensure that all traded products do not pose a risk to product safety, legality and quality and meet the specified requirements and or specifications.

8.2.3	Where traded products are purchased from companies that are not the manufacturer or packer (e.g. purchased from an agent, broker or wholesaler), the site shall know the identity of the last manufacturer or packer. Information to enable the approval of the manufacturer or packer shall be obtained from the agent, broker or wholesaler, unless they are certificated to the relevant BRCGS standard (e.g. Global Standard Consumer Products with section 8, Traded Products, Global Standard Agents and Brokers, Global Standard Storage and Distribution with Wholesaler module) or equivalent standard.
8.2.4	Records shall be maintained of the manufacturer's approval process, including audit reports or verified certificates confirming the product safety status of the sites supplying the products traded. There shall be a process of review, and records showing the follow-up of issues identified at the manufacturing/packing sites with the potential to affect products traded by the site.
8.2.5	There shall be a performance review of manufacturers/packers, based on risk and using defined performance criteria, which may include: • complaints

	• results of any product tests • regulatory warnings/alerts • customer rejections or feedback. The process shall be fully implemented.

8.3 Specifications

Clause no.	BRCGS proposed wording
Statement of intent	**Specifications, or information to meet legal requirements and assist customers in the safe use of the product shall be maintained and available to customers.**
8.3.1	Specifications shall be available for all traded products. These shall either be in the agreed format as supplied by the customer or, where this is not specified, include key data to meet legal requirements and assist the customer in the safe use of the product. Specifications may be in the form of a printed or electronic document, or part of an online specification system.
8.3.2	The site shall seek formal agreement of the specifications with relevant parties. Where specifications are not formally agreed, the site shall be able to demonstrate that it has taken steps to put an agreement in place.
8.3.3	The site shall operate demonstrable processes to ensure that any customer-specified requirements are met. This may be by including customer requirements within purchasing specifications.
8.3.4	Specifications shall be maintained, up to date, and reviewed whenever products or manufacturers change. The date of review and the approval of any changes shall be recorded.

8.4 Product inspection and testing

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall operate processes to ensure that the traded products received comply with specifications and that the supplied product is in accordance with customer requirements.**
8.4.1	Risk assessment shall be used to identify product sampling or testing requirements to verify that the traded products are in accordance with specifications and meet product safety, legality and quality requirements. Where verification is based on sampling, the sample rate and assessment process shall be risk-based. Records of the results of assessments or analysis shall be maintained.
8.4.2	Where verification of conformity is provided by the supplier (e.g. certificates of conformity or analysis), the site shall use risk assessment to determine whether periodic independent product testing/analysis may be required to ensure confidence in the information provided.

8.4.3	Where claims are made about the traded products, including the provenance, chain of custody or assured status, supporting information shall be available from the supplier, or independently to verify the claim.
8.4.4	Where testing ensuring product safety or legality is undertaken, the internal or external testing facility and methods used shall have gained recognised accreditation or operate in accordance with the requirements and principles of ISO/IEC17025, including competency testing where applicable. Where accredited test methods or reference methods are not undertaken documented justification shall be available.
8.4.4	Test and inspection results shall be retained and reviewed to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.

8.5 Product legality

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall have processes in place to ensure that the traded products comply with the legal requirements in the country of supply, where known.**
8.5.1	The site shall have processes to verify the legality of traded products. These shall include, as applicable: • labelling information • compliance with relevant legal compositional/product safety requirements • compliance with quantity or volume requirements. Where such responsibilities are undertaken by the customer, this shall be clearly stated in contracts.

8.6 Traceability

Clause no.	BRCGS proposed wording
Statement of intent	**The site shall be able to trace all traded products back to the manufacturer/packer and forward to the customer.**
8.6.1	The site's traceability procedure (see clause 3.9.1) shall include details of the system used for the traceability of traded products. The site shall maintain a traceability system for all batches of traded product that identifies the manufacturer/packer of the product. Records shall be maintained to identify the recipient of each batch of traded product from the site.
8.6.2	The site shall test the system at least annually to ensure that traceability can be determined back to the manufacturer/packer and forward to the recipient of the traded product. This shall include identification of the movement of the product through the chain from the manufacturer/packer to receipt by the

	site and distribution to the customer including each movement and intermediate place of storage.
8.6.3	The traceability test shall include the reconciliation of quantities of product received by the site for the chosen batch. Traceability should be achievable within 4 hours (1 day when information is required from external parties).

Summary of audit protocol updates

The audit protocol has been revised in line with other BRCGS Standard audit protocols and incorporates Position Statements that were issued under Global Standard Consumer Products, Issue 4.

The main changes to the audit protocol are outlined below:

The Global Standard Consumer Products provides companies with a series of audit options for certification. The options allow a flexible approach to audits in response to market demand and allow sites to choose an audit option which best suits their customers' requirements, manufacturing operations and the maturity of their product safety systems.

The general audit protocol in Part III of the Standard, describes the requirements for auditing and certification. This protocol describes how the audit process operates and explains the rules around audit and certification requirements.

Detailed below are the key changes to the audit protocol (Part III) in Issue 5 – where no details are given, the sections remain unchanged.

Audit options	**Announced audits** There is no change to this audit option - this is available for existing certificated sites and those new to certification. For announced audits, the audit date is agreed with the certification body in advance of the audit, and all requirements of the Standard are audited within the audit visit. For an announced audit, successful sites are awarded a certificate with a grade of AA, A, B, C or D, depending on the number and type of non-conformities identified. **Voluntary unannounced audits** This is a single unannounced audit against all the requirements of the Standard. This is a voluntary option and provides sites with the opportunity to demonstrate the maturity of their product safety and quality system. The date of the unannounced audit shall not be notified to the site in advance of the audit. The audit will be unannounced and replace the normal scheduled audit. It can occur at any stage within the last 4 months of the audit cycle, including the 28-calendar days before the audit due date (i.e. at any point from 4 months before the audit due date). Only a certificated site can opt for the unannounced audit programme, therefore a site's initial audit (i.e. their first audit against the Standard) will always be announced. However, they may opt into the unannounced programme for subsequent audits. For the voluntary unannounced audit, successful sites will receive an unannounced grade of AA+, A+, B+, C+ or D+, depending on the number and type of non-conformities identified. **Blended announced audits** This is a **NEW** option available in Issue 5.

	The blended announced audit programme uses information and communication technology (ICT) to remotely audit documented systems and records. The audit is split into two separate parts: a remote audit followed by an on-site audit. The remote audit (first part) uses ICT to focus predominantly on documented systems and records, while the on-site audit (second part) focuses predominantly on production, storage and other on-site areas. A blended announced audit can only be offered by the certification body following a risk assessment which: • confirms that a robust audit is possible (e.g. remote technology is available at the site) • assesses the percentage of the audit that can be completed remotely. The blended audit option is available for announced recertification audits only and not for initial audits (i.e. the first audit against the Standard). Successful sites are awarded a certificate graded AA, A, B, C or D, depending on the number and type of non-conformities identified.
Scope of the audit	No significant changes to the scope of the audit, how to define the scope and exclusions to scope – all of which will be agreed with the certification body prior to the audit and verified by the auditor during the site audit. Additional information will be included to define the limits of a site. In the circumstance where a company may own additional facilities or storage at more than one location, all operated under common management as a single operation, these may be included under a single certification. This will be considered exceptional, but allowable, where all the following conditions are met: • All sites are under the same organisation's ownership. • All sites operate within the same documented product safety and quality management systems. • The sites manufacture product which is part of the same manufacturing process (i.e. sequential steps in the manufacture are completed at different sites). • The sites solely supply the other sites, with no additional customers. • The sites are no more than 30miles/50km apart. All sites must be visited as part of the same audit schedule (i.e. within the same timeframe). This brings Global Standard Consumer Products, Issue 5 in-line with other BRCGS Standards. It shall be clearly stated on the report and certificate that the audit has consisted of visits to more than one site address (e.g. the manufacture of soap at Sector 12 Industrial Zone, Clean-Ville, and the packing of soap into retails boxes and cartons at Sector 23 Industrial Zone, Clean-Ville). As part of the appendices in Issue 5 there has been a review of the product categories (see Appendix 1).
Audit planning	The guidance and requirements for audit planning remain unchanged.

	There will be further details outlined in the information to be provided to the certification body for audit preparation. This will include information from the site to indicate if enhanced hygienic conditions are required for the manufacture of the products within the scope of certification (see section 7). **Unannounced audits – nominating non-audit days for the unannounced audit** Compliance with the standard is expected to be maintained at all times, so the site should always be 'audit ready'. However, there may be dates when an audit genuinely cannot take place, such as when there is a planned customer visit. A site may nominate up to 10 days when it is not available for an audit. Days when the site is not operating (e.g. public holidays and site shutdowns) are not included with the nominated 10 days. The certification body must be notified of any such non-operational days, including the dates and reasons, at least 4 weeks in advance. The certification body may challenge the reason where this does not appear appropriate, and at its discretion accept these nominated dates. Certification bodies are expected to operate discretion in the case of emergencies. It is a condition of the unannounced audit that the auditor shall be granted access to the site for the audit on arrival.
Duration of the audit	There have been significant changes to Issue 5, therefore the audit duration is currently under review by the Technical Working Group. The typical audit duration of an audit will depend on the scope of the activities of the site, the minimum audit duration is likely to be 1.5 days (typically 8-9 hours/day, but never more than 10 hours/day) at the site. The audit duration calculator is being developed to assess the expected time required to undertake an audit of any site to ensure consistency, and this shall be used as the basis for calculating the total audit duration. The revised audit duration calculator will be available after the launch of the standard.
Audit reporting	There will be no requirement from BRCGS for interim reporting.
Post audit activities	**Communication with certification bodies** The Standard now includes the requirement for notification to certification bodies of incidents within 3-working days.

Appendix 1: Product categories

Product categories are used to categorise the site activities and ensure that auditors selected to conduct the audit are sufficiently competent to understand the processes carried out at the site

Medical devices, games and toys are now incorporated into the relevant product categories depending on their fabrication and the typical processes that apply to their manufacture.

If the products are fully manufactured on site and not just assembled and have more than one component e.g. metal and textiles (for lampshades), the site will be assessed against the appropriate categories, and the auditor must have all the relevant category approvals.

This appendix has been fully reviewed looking at typical processes for each product category. This will still allow sites to be able to assign a product category for the activities they undertake.

For example: In Issue 4, medical devices was a separate category. For Issue 5, elements within this category have been reviewed and assigned to new category groupings. To illustrate the changes 'plasters' are now included under Textiles and textile mix products, 'wound dressings' are now included under Textiles and textile mix products *and* formulated chemical products and blood pressure monitors will now be under electronic equipment.

BRCGS product code	Product category	Typical processes
CP1	Textiles and textile mix products	• bleaching • dyeing • carding • spinning • weaving • knitting • sewing • cutting • CAD design • punching • embroidering and decorating • glueing
CP2	Paper and paper-mix products	• pulp to sheet or web • conversion of sheet or web-fed paper • aeration of paper fibres • die-cutting, folding and gluing (erecting) • printing • moulding of pulp (of any source) • trimming and cutting
CP3	Coke, charcoal, refined petroleum products, oils, waxes, fireworks	• Coking and controlled burning • Moulding, dipping and pouring • Refining • Mixing and formulating
CP4	Formulated chemical products	• Mixing and formulating • Melting • Impregnating • Moulding and pressing

CP5	Plastic, silicone and rubber products	• Extrusion • Moulding • Cutting • Forming
CP6	Glass, ceramic and non-metallic mineral products	• Moulding • Firing • Melting • Decorating • Silvering
CP7	Metal products (excluding machinery)	• Smelting • Rolling or pressing • Slitting and trimming • Extrusion • Stamping and punching • Plating
CP8	Electronic equipment and batteries	• Fabricating • Component assembly • Wiring
CP9	Wood, wood mix, cork, bamboo and straw	• Cutting • Chipping • Gluing • Moulding and compressing • Weaving • Turning and carving • Carpentry
CP10	Assembly only	• Gift packing • Contract packing • Collation and combination No products are manufactured on site; all components are supplied from other manufacturing sites for assembling finished products. **Note**: Any food product components used must be pre-packaged. If open food product components are handled then this assembling activity is outside the scope of this Standard, and the site would need to be assessed and certificated to the Global Standard Food Safety.

Appendix 2: Enhanced hygienic conditions

Some products that fall under the Standard will require enhanced hygienic controls due to the nature of the products and their intended use. These types of products are susceptible to growth or survival of spoilage and/or pathogenic micro-organisms, both which ultimately may have an adverse effect on the safety or efficacy of the product to the end user.

By implementation of enhanced hygienic conditions, the site will be able to demonstrate that consideration has been given (via a product and process risk assessment - see section 2) to eliminate or effectively reduce the potential of microbiological contamination from personnel, premises, equipment and operational processes.

The product safety controls operated at a site shall be appropriate to the product being manufactured and its intended use. The expectations for housekeeping and hygiene, building interiors, equipment, protective clothing and personal hygiene should ensure the potential risks to the products are being controlled.

During the review of Issue 4 of the standard and updating to Issue 5 it is recognised that the majority of consumer products will not require enhanced hygienic controls.

Identifying the products that require these enhanced hygienic conditions will direct the site to implement the requirements in section 7. Further to the risk assessment 2.1.1.3, the following two criteria must be assessed by the site to confirm if section 7 is applicable.

Enhanced hygienic conditions are a requirement for sites that manufacture products with:

- Specific hygienic manufacturing legislation in relation to microbiological contamination applicable to country of manufacture and supply e.g. global cosmetic regulations or medical device hygienic manufacture regulations
  and/or
- Where a risk assessment has identified that finished products can support microbiological growth or survival resulting in potential harm to the consumer e.g. internal sanitary protection products.

Appendix 1 gives details of the revised product categories with examples of typical processes for each category.

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