

CP435: Consumer Products, Issue 4,

Position Statements

Document scope

Position statements are used where clarification or interpretation of a requirement of a BRCGS Standard or its protocol is necessary. This will be published on the BRCGS website [brcgs.com](https://www.brcgs.com) and on Participate as a Position Statement. Such statements are mandatory in their use from the date specified for implementation or the date of publication on the BRCGS website, where no date is specified.

Change log

Version	Date	Description
1	06 Jun 2024	First version. This document replaces CP429.
1.1	06 Oct 2026	Rebranded document

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Position statement 1

BRCGS Unannounced Audits

1 Introduction

Since the introduction of the unannounced audit for Consumer Products Standard Issue 4 several of the requirements have changed and need to be brought in line with other BRCGS Standards. This document clarifies these updates for the unannounced BRCGS audits requirements for Consumer Products.

2 The unannounced audit protocol.

Where a certificated site wishes to have an unannounced audit, this will be a single unannounced audit against all the requirements of the Standard. The date of the 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 to the BRCGS Standard for Consumer Products) will always be announced. However, they may opt into the unannounced programme for all subsequent audits.

2.1 Audit planning.

2.1.1 Selection of the unannounced audit programme

The site shall notify its certification body within 3 months of the last audit date of its intention to join or remain within the unannounced audit programme. This allows the opportunity for the site to select an alternative certification body if required while allowing the audit to be undertaken at a time of the certification body's choosing.

2.1.2 Preparation by the Site

The actual audit date will not be provided by the certification body, and it is therefore important that the site has arrangements in place to receive an audit and facilitate the audit process.

Success at an unannounced audit relies upon the ability of the site to share information and knowledge within the site, to have effective deputies to cover in the absence of the relevant manager, and a shared responsibility within the management team for product safety and compliance with the Standard.

2.1.3 Information to be provided to the certification body for audit preparation

The site shall notify the certification body within 3 months of the last audit date of its intention to proceed with the unannounced audit programme. The site shall supply the certification body with background information prior to the audit day to ensure the auditor(s) is fully prepared and to provide the best opportunity for the audit to be completed efficiently. The information will be requested by the certification body and may include but is not limited to:

- a summary of critical control points (CCPs)
- the process flow diagram
- a simple site plan
- the management organisational chart
- the list of products or product groups included within the audit scope
- typical shift patterns
- production schedules, to allow audits to cover relevant processes (e.g. night-time manufacture or where production processes are not carried out each day)
- recent quality issues, withdrawals or customer complaints and other relevant performance data.

The site shall make the previous year's audit report and certificate available to the certification body, where this is a contract with a new certification body.

As the audit will be unannounced, it is likely that the certification body may also require additional information to plan for the logistics of the audit process. This may include:

- specific site directions, site entrance requirements, car parking
- a list of contacts when first arriving on site
- specific protective clothing arrangements
- any specific security arrangements to follow to gain access to the site
- any significant changes in availability of the site to receive the auditor.

2.1.4 Nominating non-audit days

Compliance with the Standard is expected to be always maintained and the site should therefore always be 'audit ready'. However, there may be dates when an audit genuinely cannot take place, such as a planned customer visit. The unannounced programme therefore allows sites the opportunity to nominate up to 10 days when the site is genuinely not available for an audit.

The dates and the reasons must be provided to the certification body within 3-months of opting into the programme. At the discretion of the certification body, other unavailable dates may be accepted when provided at least 4 weeks in advance of the next unavailable date. The certification body may challenge the reason where this does not appear appropriate and at its discretion accept these nominated dates.

Days when the factory is not operating (e.g. weekends, public holidays, planned shutdowns for site holidays or maintenance) are not included within the 10 days. Any such non-production days shall be notified to the certification body when opting into the unannounced programme.

Certification bodies are expected to operate discretion in the case of emergencies.

It is a condition of electing to join the unannounced programme that the auditor shall be granted access to the site for the audit on arrival. If access is denied the site will be liable for the auditor's costs and will revert to the announced audit programme. At the discretion of the certification body, the existing certificate may also be suspended or withdrawn.

2.1.5 Audit duration

The typical duration of an audit is 1 to 1.5 days (8 hours/day) at the site at foundation level and 2 to 3 days at higher level. When published, audit duration shall be calculated using the BRCGS audit calculator (CP412).

2.2 The on-site audit

Sites opting for the unannounced programme shall be obliged to accommodate the auditor and allow the audit to start immediately on arrival at the site. The audit process will follow the same procedures as outlined for an announced audit. There will be a short opening meeting after which the site production facility inspection will be expected to commence within 30 minutes of the auditor arriving on site.

The site shall fully assist the auditor(s) throughout the audit. It is expected that at the opening and closing meetings those attending on behalf of the site will be senior managers who have the appropriate authority to ensure that corrective action can be progressed if non-conformities are found. The most senior operations manager on site or their nominated deputy shall be available at the audit and attend the opening and closing meetings.

The audit process gives emphasis to the practical implementation of the Standard and general good manufacturing practices. It is expected that at least 50% of the audit will be spent auditing production and site facilities, interviewing staff, observing processes and reviewing documentation in production areas with the relevant staff.

During the audit, detailed notes shall be made regarding the site's conformities and non-conformities against the Standard and these will be used as the basis for the audit report. The auditor(s) shall

assess the nature and severity of any non-conformity and shall discuss this with the accompanying manager at the time.

At the closing meeting, the auditor(s) shall present their findings and reconfirm all non-conformities that have been identified during the audit but shall not make comment on the likely outcome of the certification process. Information on the process and timescales for the site to provide evidence to the auditor(s) of the corrective action to close non-conformities must be given. A written summary of the non-conformities discussed at the closing meeting will be documented by the auditor(s) either at the closing meeting or within one working day after completion of the audit.

After completion of the certification process, BRCGS will email the site contact with instructions on how to manage the site's entry in the BRCGS Directory and the BRCGS compliance programme, and how to register for service package benefits. The BRCGS Directory allows both the client and its nominated customers secure access to audit data, and the BRCGS compliance programme provides feedback systems enabling sites to communicate with the certification body and the BRCGS team.

The decision to award certification and the grade of the certificate will be determined independently by the certification body management, following a technical review of the audit report and the closing of non-conformities in the appropriate timeframe. The site will be informed of the certification decision following this review.

2.3 Non-conformities and corrective action

Procedures for handling non-conformities and corrective actions are the same as for the announced audit scheme (see section 2.3.2). Any concessions requested by a site (e.g. an extension) will be considered and managed by the certification body.

2.4 Grading of the audit

The process for grading is the same as for the announced audit programme (see section 2.4 of the Standard). For higher level, the grade awarded following certification shall be based on the number and level of non-conformities, as outlined in Table 1 of the Standard. Note that the grade will have the addition of a plus symbol after the grade (i.e. AA+, A+, B+, C+ or D+). For foundation level this will be represented as FOUNDATION +

2.5 Audit reporting

The audit reporting requirements are the same as for the announced audit programme (see section 2.5 of the Standard). However, the report shall state 'Unannounced'.

2.6 Certification

The certification requirements are the same as for the announced audit scheme (see section 2.6 of the Standard). However, the certificate shall state 'Unannounced'.

This certificate will supersede the existing certificate. The certificate shall be issued within 42 days of the audit and will have an expiry date based on the expiry date of the previous certificate plus 12 months, providing the site remains within the unannounced audit programme. If the site decides to return to the announced audit programme, the certificate expiry date will be based on 12 months from the date of the unannounced audit.

This ensures that where the audit occurs before the expiry of the current certificate and the site remains within the unannounced programme it is not disadvantaged by a shorter certificate life and increased frequency of audits. So, the frequency of audits remains the same, but the certificate life may be longer.

2.7 Ongoing audit frequency and recertification

2.7.1 Scheduling re-audit dates

The site can choose whether to:

- remain within the unannounced programme
- revert to the announced audit programme.

If the site wishes to remain in the unannounced programme the next audit will be unannounced. The audit may 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). This allows sufficient time for corrective action to take place in the event of any non-conformities being raised without jeopardising continued certification.

It is the responsibility of the certification body to ensure that the audit is undertaken within the certification window and the late audit non-conformity clause (1.1.5) shall not apply.

If the site wishes to withdraw from the unannounced audit programme, the next audit will be scheduled to occur within the 28 days up to and including the anniversary of the last audit date; this ensures that the maximum time between audits is not more than a year.

2.7.2 Seasonal production sites

The unannounced programme may be applied to seasonal production sites (see the glossary for the definition of 'seasonal or intermittent production sites'). The following rules will, however, apply:

- The expected seasonal production dates shall be notified to the certification body at the time of choosing the unannounced programme.
- No dates may be excluded within the production season.

The audit due dates for some sites producing seasonal product may occur towards the beginning of the product's season and this could limit the dates available to carry out the unannounced audit before the end of the re-audit window.

Therefore, in the first year that the site is within the unannounced programme the audit window is extended to allow the unannounced audit to be carried out up to 6 weeks after the audit due date. There will be no penalty for late audits in this situation. This is to ensure that there are sufficient dates to conduct a truly unannounced audit.

The subsequent audit due date and the certificate expiry date (42 days later) shall be based on the typical production season end date agreed between the site and the certification body. In practice this will mean the issue of a certificate with a duration of more than 1 year on occasions.

Unannounced audits from year 2 may then occur at any date during the season and meet normal certification rules.

As detailed in 2.1.1 the site shall notify the certification body within 3 months of the last audit date of its intention to proceed with the unannounced audit programme. in accordance with the BRCGS audit protocol.

2.7.3 Compliance

Regardless of the audit programme selected by the site, the BRCGS compliance process still applies.

In some situations, the certification body may have already scheduled the unannounced audit with a 9-month timescale (for example, to ensure time for planning of visas). To accommodate this, BRCGS will allow certification bodies to complete audits outside the 4-month window but within the 9-month window until **1 January 2025**. After this date, all unannounced audits will be carried out within the 4-month window as described in this position statement.

Position statement 2

Raising a nonconformance for incorrect use of the BRCGS Consumer Products logo.

The BRCGS logo and references to certification status shall be used only in accordance with the conditions of use detailed in the audit protocol section (Part III, section 3.6) of the Standard. However, there is currently no provision to raise a non-conformance if the logo is not used correctly. Therefore, to address this going forward from the effective date stated below, a non-conformity would be raised against clause 1.1.6. "The sites shall have a genuine hard copy or electronic version of the current standard available, with a position statement, and be aware of any changes to the standard or protocol that are published on the BRCGS website."

Adding this would bring the Consumer Product standards in line with the other BRCGS standards.

Effective date: 1 November 2024.