

# BRCGS079: Position Statement and Protocol on Unannounced Audits – Meeting the GFSI Benchmark

## Document scope

This document outlines the requirements and the procedures for sites and certification bodies to implement the GFSI Benchmark for unannounced audits at least once every 3 years and is applicable to the following Standards:

- Food Safety
- Packaging Materials
- Storage and Distribution

## Change log

| <i>Version</i> | <i>Date</i> | <i>Description</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
|----------------|-------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1              | 09 Oct 2020 | First publication of document.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| 2              | 25 Feb 2021 | Updated to include requirements for exceptional circumstances for extremely short season, small sites and intermittent operation (section 5.8) and information about unannounced audits for Storage and Distribution (Issue 4) in section 2.1. Section 1.1 audit dates clarified in response to feedback.                                                                                                                                                                                                                                                                                                    |
| 3              | 16 Jun 2022 | Updated to reflect frequently asked questions relating to the audit protocol for mandatory unannounced audits. Key changes are: <ul style="list-style-type: none"> <li>– Protocol for seasonal sites and the addition of new scheduling examples</li> <li>– Clarification of audit type on the report and certificate</li> <li>– Sites certificated to multiple standards</li> <li>– Removal of instructions for actions that certification bodies were required to complete during 2021</li> <li>– Amended protocol for exceptional circumstances</li> <li>– Clarification on additional modules</li> </ul> |
| 4              | 29 Nov 2022 | Removal of exceptional circumstances 5.8 example due to confusion – <i>‘where the site may be unsupervised for significant time periods in a work day’</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| 5              | 21Dec 2023  | Reflecting update of site responsibility to ensure unannounced audits can be undertaken to protocol. Clarification on expectation of consecutive audit days. Highlight that sites may not change CBs in the 4-month audit window. Dealing with maintenance schedules. Correction of seasonal site next audit due guidance. Removed reference to Storage and Distribution 18-month certificate.                                                                                                                                                                                                               |
| 6              | 24 Jul 2024 | Update to 2.1 audit planning process - with clarification of the certification body's responsibility. Clarification of 4-months period when the site is not permitted to change the Certification Body                                                                                                                                                                                                                                                                                                                                                                                                       |

|     |             |                                                                                                                                                                       |
|-----|-------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|     |             | (section 2.7). Consequences of refusal of a company to undertake the unannounced audit has been updated (section 5.1).                                                |
| 6.1 | 06 Oct 2026 | Document rebranded. Title slightly updated and detail added to document scope. Contents list updated. Minor grammatical changes made. Mention of Packaging 6 updated. |

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## 1. Introduction

### 1.1 Background

Unannounced audits provide companies with an opportunity to:

- demonstrate confidence in their systems and procedures, to the extent that they can be subjected to unannounced scrutiny
- adopt an audit ready food safety culture
- improve customer confidence, by providing their customers with an independent unannounced review of systems and procedures that demonstrates they are maintaining their systems in good order

Due to the added confidence provided by unannounced audits, the GFSI Benchmark Version 2020 introduced a new requirement for certificated sites (with food safety, packaging materials or storage & distribution scopes) to have *at least 1 unannounced audit every 3 years*, i.e. sites certificated prior to 2022 must have at least one unannounced audit during 2022 – 2024. For sites new to certification the first BRCGS audit should be announced, (unless the site has specifically requested an unannounced audit (refer to section 1.2)), with the first unannounced audit occurring within either of the following 2 years. Subsequent unannounced audits will occur at least every 3 years. For sites with annual (12 month) audits, this will result in at least every third audit being unannounced. Where a site has a different audit frequency, the unannounced audit remains at least once every 3 years, for example:

- Sites who receive a grade C or D at any of their audits will still be expected to have an unannounced audit at least once every 3 years, but there will obviously be a larger number of announced audits in the interim.

The certification body must notify the site whether their next audit will be announced or unannounced and update the Directory accordingly (refer to 2.3).

Example audit schedules are shown in appendix 1.

### 1.2 Who is affected?

All sites certificated to a GFSI benchmarked standard for food safety, packaging materials or storage & distribution using an announced audit programme are affected. This includes announced and blended announced audits for:

- Global Standard Food Safety issue 9
- Global Standard Packaging Materials issue 7
- Global Standard Storage and Distribution issue 4

This position statement supersedes any details currently in the Standards specified above.

Sites that have opted into the fully unannounced audit programme are not affected by this change and will continue to follow the unannounced audit protocol outlined within the Standard they are certificated to. Where a site chooses to revert to the announced or blended announced audit programme then these requirements will apply.

Global Standard Agents and Brokers and the Global Standard Consumer Products are not affected by this position statement.

### 1.3 Timelines for the introduction of unannounced audits

**BRCGS audits that started on or after 1 February 2021** will be completed according to this protocol.

**For Storage and Distribution these requirements only apply to Issue 4**, and therefore only applied to audits from 1 May 2021.

Therefore, after these dates, following the issue of a certificate, the certification body will notify the site whether their *next* assessment will be announced or unannounced.

## 2. The audit planning process

### 2.1 What is the process?

The certification body is responsible for managing the audit process and ensuring that within each 3-year period certificated sites have received at least 1 unannounced audit.

It is therefore expected that each year, the certification body will aim for approximately a third of the BRCGS certificated sites, within the announced or blended announced audit programmes, to be completed as unannounced audits (this is in addition to any sites that have opted for the fully unannounced audit programme). Certification bodies will discuss audit options with sites and notify them which year an unannounced audit will take place (obviously the actual date of the unannounced audit will not be communicated to the site). This discussion must occur within 3 months after the last audit, to ensure that the site knows if an unannounced audit will take place in the coming year.

*It is certification body's responsibility to initiate the unannounced audit process within 6 months after the last audit and request all information from the site/company to be able to schedule the audit within the audit window.*

As stated in the position statements for each of the Standards, it is the site's responsibility to ensure that all requirements are in place to ensure the unannounced audit can be undertaken in accordance with the protocol, and this includes agreeing contractual terms with the certification body in advance of the start of the 4 month window, and keeping the certification body up to date on changes that may affect this planning, such as maintenance shutdowns. Sites that have changed (or are planning to change) certification body should refer to section 2.7 below.

The unannounced audit can take place at any time during the 4 months prior to the audit due date. This period, when an audit can occur, includes the 28 days immediately prior to the audit due date. It should be remembered that BRCGS audits cannot take place after the audit due date, except by concession in the event of exceptional circumstances or seasonal sites in accordance with section 5.7.

Where the site has not made adequate arrangements with the certification body in due time prior to the start of the 4-month audit window, the audit due date will be shifted to accommodate the 'late start' and the unannounced audit may be completed at any time in the next 4 months. Sites should acknowledge that their current certificate may therefore expire. In addition, a major non-conformity shall be awarded. Certification bodies shall inform BRCGS through the usual concession process.

The first BRCGS audit at a site should be announced, unless the site has specifically requested an unannounced audit.

Where a company has a separate head office audit prior to the audits of its individual production sites, the head office audit may be completed as an announced audit (only the production site audits must be unannounced). The certification body should schedule the head office audit prior to the start of the unannounced audit window at the first site to ensure that the full audit window remains available for the site audit.

Where a site has included additional modules within the scope of the audit, the audit protocol for the specific module applies. The audit of the module can be completed as part of the BRCGS audit and can therefore be completed unannounced when the audit of the Standard is unannounced. Where a site needs an extension to scope audit, separate from the scheduled annual audit, for example, due to the introduction of a new product or process, this may be completed as an announced audit.

**For Storage and Distribution:** For the year when a site is due their unannounced audit, storage and distribution operations will have two options to choose from:

- Option 1 - fully unannounced
- Option 2 - part unannounced/part announced

### 2.2 Information to be provided to the certification body for audit preparation

The certification body will require some additional information to help them plan audits and ensure that the auditor does not turn up when there is no production. This information is likely to include:

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- Typical shift patterns
- Shift patterns or production schedules, to allow audits to cover relevant processes, for example, where certain production processes are not completed every day
- Any dates where an audit cannot take place, for example, due to no planned production
- The management organisational chart
- A simple site plan
- The process flow diagram
- A summary of critical control points (CCPs)
- The list of products or product groups with the audit scope
- A copy of the last audit report (where the audit was completed by another certification body)

It is important that this information remains up to date and any changes are notified to the certification body in a timely manner. The site is responsible for communicating any changes in a timely manner.

## 2.3 Scheduling

The unannounced audit will replace the normal scheduled (announced or blended announced) audit. It can occur at any stage within the last 4 months of the certification cycle, including the last 28 days before the audit due date (i.e. unannounced audit within the 4 months prior to the audit due date). The certification body must have a system to ensure audit dates are unannounced, for example, by using the whole audit window (i.e. not scheduling all unannounced audits within the last 28 days of the audit window) and not using the same audit dates on consecutive years.

The audits shall only take place on weekdays, during normal site operations, unless other arrangements have been agreed in advance with the site. Audits are normally completed on a number of consecutive audit days, but in exceptional circumstances may have a break of no longer than a week between audit days. This should be agreed with BRCGS, in advance, through the concession process.

The site *must not* be notified of the proposed audit date in advance.

In accordance with NGD0004 audit dates are expected to be added to the BRCGS Directory. (Note the audit dates are not visible or accessible to the site or supplier so this will not enable sites on the unannounced audit programme to see their planned audit date).

## 2.4 Nominating non-audit days

It is expected that compliance with the Standard is maintained at all times and that the site is therefore audit ready. However, there may be dates when an audit genuinely cannot take place, for example, when there is no production, or the site is closed.

Therefore, a site may nominate a maximum of 10 days when they are not available for an audit. Sites on a 6-month audit schedule (e.g. sites certificated to the Global Standard Food Safety with grades C or D) may nominate a maximum of 5 days.

Days when the factory is not operating (e.g. public holidays or site holidays) are not included with the 10 days (or 5 days). Any such non-production days must be notified to the certification body.

Any nominated non-audit days must be for a justifiable reason, for example due to a customer visit for a scheduled first production, which involves technical and managerial staff. Whereas non-audit days caused by a specific colleague being absent (such as on holiday) is not justifiable (refer to section 5.2) nor is booking a single day every week. The dates and reasons must be provided to the certification body as soon as known and at least 4 weeks in advance. The certification body may challenge the reason where this does not appear appropriate and at its discretion refuse these nominated dates if they are not justifiable.

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

## 2.5 Arrival on site

It is particularly important that the usual practical issues surrounding the audit are agreed at the time of registering for an audit, periodically reviewed, and where necessary updated. This includes:

- Directions to the site
- Site contact on arrival and their deputy
- Agreed earliest time of arrival
- Factory protective clothing requirements (e.g. coat and shoe size)
- Pre-providing factory entry rules such as videos/questionnaires to ensure efficiency

## 2.6 Auditor identification

As the site will not be expecting the auditor's arrival, it is important that the auditor has sufficient identification to confirm that they are a genuine representative of the certification body. This may include the option for the site to contact the certification body to confirm the identification.

## 2.7 Changing certification body

Within 3 months of an audit the certification body will communicate to the site whether the next audit will be announced or unannounced.

If the site chooses to change certification body this does not change the requirement for the site to receive an unannounced audit where this has already been notified to the site. Therefore, the site must ensure that the new certification body is aware that the site is already certificated, whether the next audit was scheduled to be announced or unannounced and provide the date of their last unannounced audit. The certification body will also require evidence of the site's audit history (for example, by receiving a copy of the most recent audit report) such that the 3-year cycle can be maintained. N.B. sharing the last audit report is a mandatory requirement of the BRCGS protocol (for example, in the Global Standard Food Safety Issue 9 protocol section 2.7.7). Certification bodies are advised to ensure this forms part of the contractual process with the site. Where a site fails to share their last audit report in a timely manner, the new certification body will have access to the last audit report via the BRCGS Directory.

A site is not permitted to change Certification bodies (from the current certifying body) in the last *4-months before the re-audit due date*, whether an unannounced audit is scheduled or not, unless agreed in writing with BRCGS through the certification body concession process.

Where a site fails to have an unannounced audit within the 3-year period, it may result in the final audit being refused by BRCGS and the site becoming uncertificated until such a time as an unannounced audit is completed.

## 3. The audit

### 3.1 Structure of the audit

The objective of the audit is to encourage sites to adopt an audit ready food safety culture and not to try to catch sites out. The intent of the audit is therefore to make an objective assessment of the everyday operating standards of the site in relation to the requirements of the Standard.

The procedures and content of the audit are identical regardless of whether the audit is announced or unannounced. However, unannounced audits will commence with a short opening meeting followed by an immediate inspection of the production facilities. It is expected that the production facility audit will commence as soon as possible and within a maximum of 30 minutes of the auditor arriving on site.

The auditor will need to understand any issues with:

- non-availability of key staff
- any time dependent processes (e.g. line changeover)

These should be discussed at the opening meeting and may require careful scheduling of the items within the audit.

## 4. Post-audit processes

### 4.1 Audit grading and certification

The process for reporting and correcting non-conformities is exactly the same for all BRCGS audits, i.e. following the audit, the site must undertake corrective action to remedy all the non-conformities identified during the audit. The site must also complete root cause analysis to identify the underlying cause of each non-conformity and develop a preventive action plan to address each of the root causes. This information must be submitted to the certification body within 28 days of the completion of the audit.

After a review of the audit report and the documentary evidence demonstrating corrective actions have been completed, a certification decision is made by the certification body. Where a certificate is granted the new certificate will be issued within 42 days.

Sites having an unannounced audit will receive an unannounced audit grade (e.g. AA+ or A+).

BRCGS will amend the BRCGS Directory so that the audit report and certificate can indicate that the audit type is 'Unannounced – mandatory 1 in 3 years'. Until this change is made for all Standards the audit type 'unannounced' should be used.

### 4.2 Certification dates

The unannounced audit certificate will supersede the existing certificate. It will be issued within 42 days of the audit (assuming that certification is appropriate based on the number and severity of the non-conformities and completion of corrective actions). The certificate will have an expiry date based on the expiry date of the previous certificate plus 6 or 12 months (depending on grade). Refer to Appendix 1 for example dates.

The date range for the next audit (the re-audit due date range) will be dependent on whether the next audit is scheduled to be announced or unannounced. This could potentially lead to inaccurate date ranges on the certificate (for example, if decisions regarding whether the next audit is announced or unannounced are made after the certificate is issued). Therefore, the re-audit due date range usually applied to certificates, will be replaced by a single re-audit due date, representing the end of the period in which the audit should occur (i.e. audits, regardless of whether they are announced or unannounced must occur before this date).

## 5. General guidance – problems and challenges

### 5.1 Refusal of a company to undertake the unannounced audit

Sites are obliged to accommodate the auditor and allow the audit to commence on the auditor's arrival at the site.

Sites have the opportunity to nominate (in advance) days when the audit cannot take place (refer to section 2.4 above).

Therefore, if the auditor arrives for the audit and is denied access, the site's certification will be suspended. The site will remain suspended until a new unannounced audit can be completed. Since the new audit will be unannounced, the site will not be told the new audit date, which will occur within the next 4 months after the refused audit. *This audit will not reset the audit window. In addition, a major nonconformity shall be awarded.* The audit will be completed by the same certification body, unless a concession is granted by BRCGS to change certification body during this period.

Certification bodies should establish processes to handle the recovery of costs under such circumstances.

## 5.2 Non-availability of key staff at the opening or closing meeting or during the audit

The Standards require the most senior production or operation manager (i.e. those who are responsible for the 'hands on' running of the site) to be present at the opening and closing meetings. Some managers may be absent on the day of the audit due to other commitments; however, there shall always be a nominated deputy available. For example, in the Global Standard Food Safety:

- clause 1.1.11 requires the senior production or operation manager to attend opening and closing meetings
- clause 1.2.1 requires clear documentation regarding who deputises in the absence of the responsible person

Where a key member of staff, for example the technical manager (or quality manager), is away on the day of the audit, this will not be accepted as a reason to prevent the audit going ahead. It is expected that there is cover for managers in their absence.

## 5.3 No production during the audit

As part of the audit planning the site must notify the certification body of any particular days or times when production is not undertaken (refer to sections 2.2 and 2.4). For example where production is intermittent during the week (i.e. dependent on labour, supplies, seasons, catch timing, weather etc.) the site must keep the certification body informed on a weekly basis.

Where maintenance schedules significantly impact the 4-month audit window, the certification body may consider undertaking an audit earlier than the audit window start or may shift the 4-month window to start after maintenance is completed. In this instance sites should acknowledge that the current certificate may therefore expire. If the audit takes place on a date when production was supposed to be undertaken, but on arrival the auditor finds there is either no production or the only products being manufactured are outside scope, this will impact the audit. Where the audit is scheduled for multiple days, then if production is still expected on the subsequent days, it may be possible to re-organise the audit plan, so the initial day is predominantly documentation and then, once production starts, the remainder of the audit is predominantly focused on production and good manufacturing practices (GMP). However, where there is no production throughout the entire duration of the audit, it will not be possible to complete the audit. A further unannounced audit will need to be arranged (in exceptional circumstances, for example where arrangements can be made to complete the audit within 2 - 3 days then this may be discussed with BRCGS as to whether a concession is appropriate).

Where the audit is scheduled to include some additional activities, for example, an additional module, the BRCGS Global Standard Gluten-Free or the Global Standard Plant-Based, then these additional activities may be included within the scope of the unannounced audit using the following processes:

- **Additional modules** - an additional module may be included in the scope of the unannounced audit, providing the auditor can assess sufficient records and production areas relevant to the additional module and have confidence of compliance to the module requirements. Where compliance to the requirements cannot be assessed, for example, where a module requires the auditor to witness the manufacture of a specific type of product which is not produced during the audit, then the Standard audit must still be completed unannounced and the module assessed separately. For the Global Standards Food Safety and Packaging Materials this means that the assessment of the module requirements will be completed separately using the procedure for a standalone audit of the additional module. BRCGS expect that modules incorporated into the Global Standard Storage and Distribution will be scheduled and completed during the unannounced audit, and any situations where this is not possible should be discussed with BRCGS.
- **Gluten-Free and Plant-Based certification** - Where the scope of the audit includes either the BRCGS Global Standards Gluten-Free or the Plant-Based, if there are sufficient production dates to allow an unannounced audit then the audits can be combined and unannounced (for example, a combined Food Safety and Gluten-Free audit). However, if there are insufficient production dates, preventing an unannounced audit, then the Food Safety audit will need to be completed unannounced, and subsequently an announced standalone Gluten-Free or Plant-Based

audit will need to be completed. Ideally this audit will occur shortly after the unannounced Food Safety audit.

- **Gluten-Free and Plant-Based certification** - If the auditor arrives at a site to complete an unannounced audit and production has changed, such that there is no Gluten-Free and/or Plant-Based production) then the Food Safety audit can continue unannounced. Where the audit is scheduled for multiple days, then if relevant production is expected on the subsequent days, it may be possible to re-organise the audit plan, so the initial day is predominantly Food Safety and then, once Gluten-Free or Plant-Based production starts, these can be audited. However, where there is no relevant production throughout the entire duration of the audit, it will not be possible to complete the Gluten-Free and/or Plant-Based audit. A further announced standalone audit will need to be arranged to cover the Gluten-Free and/or Plant-Based activities.

Liability for the auditor's time should be covered within the certification body contract with the site.

## 5.4 Audit duration

The audit duration will be calculated using the BRCGS audit duration calculator for the appropriate Standard and will be the same as for an announced audit.

The auditor will work with the site to plan the audit and allow time for any documentation to be found and audited. The audit duration calculator explains to certification bodies/auditors the changes that can be made to the audit duration in the event of prolonged delays.

## 5.5 Combined audits with an additional scheme

The BRCGS audit must follow the rules outlined above and in the Standard's audit protocol.

The certification body may be able to approach the other scheme and clarify whether they would accept an unannounced audit. If this is acceptable then both audits can be completed unannounced and simultaneously. However, if the other scheme owner does not permit unannounced audits, or the site wishes to have two separate audits then the audits will need to occur on different dates. In this situation the BRCGS audit must meet the protocol within this document, i.e. at least one unannounced BRCGS audit every 3 years.

Where a site is certificated to multiple BRCGS Standards which require unannounced audits (e.g. a site certificated to Food and Storage & Distribution), it is recommended that the audits are completed simultaneously. In this situation, both Standards will be audited at the same time, and to the same audit programme (i.e. either both Standards will be audited announced or both Standards will be audited unannounced). Where this is not possible, or the site requests separate audits for each Standard, then:

- if both Standards require unannounced audits according to the GFSI benchmark (i.e. Food Safety, Packaging or Storage & Distribution), then both audits must be unannounced
- if one of the Standards does not require unannounced audits according to the GFSI benchmark (i.e. Global Standard Agents and Brokers or a Standard which is not GFSI benchmarked) then that audit can be announced.

## 5.6 Site not certificated following an audit

Where a site cannot be certificated due to the number or level of the non-conformities identified during the audit, the site will require a further full audit before certification can be considered.

Once the site has addressed the non-conformities that were raised at the audit, it can arrange this new audit. The re-audit shall not take place any earlier than 28 calendar days from the last audit date.

The re-audit shall be announced.

The re-audit will be completed by the same certification body, unless a concession is granted by BRCGS to change certification body during this period.

It should be noted that a failed unannounced audit meets the GFSI benchmark requirement to have at least one unannounced audit every 3 years.

## 5.7 Seasonal production

Seasonal sites are included in the requirement for unannounced audits. However, the following rules apply:

- the expected seasonal production dates must be communicated to the certification body and kept up to date
- where the length of the season is less than the 4-month audit window, the maximum number of non-audit dates will be reduced on a pro rata basis (i.e. if the production season is only 2 months long, it is equal to half of the audit window and therefore the maximum number of non-audit days available to the site is 5 days (half of the normal 10 day allowance))
- where the audit due date occurs towards the beginning of the season and this could limit the dates available to carry out unannounced audits before the end of the re-audit window, the audit window may be 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 a late audit. The certification body should indicate that it was an 'unannounced audit at a seasonal site' as the justification for the late audit. The certification body will need to request a concession for this late audit. It should be noted that in this case the site is likely to be uncertificated for a period until the new certificate is issued.

The subsequent audit due date and certificate expiry date (42 calendar days later) shall be based on the typical season end date agreed between the site and the certification body but cannot be later than 12 months and 12 weeks after the previous re-audit due date

Refer to Section 5.3 for information regarding no production during the audit (e.g. due to an unexpected change in seasonality).

## 5.8 Exceptional circumstances

GFSI have confirmed that unannounced audits, means 'no notice given' in advance of the audit. However, there are certain circumstances where the site operation will provide some challenges in meeting all the requirements of BRCGS079. Examples include:

- audits to secure facilities which require security protocols to be fulfilled prior to the visit
- remote or inaccessible sites where the practical logistics of arranging travel or accommodation necessitate arrangements being made by the site, as they are not serviced by 'public transport' or accessible by standard travel means such as a car, or the site is remotely located and there is no accommodation available and the auditor will have to be hosted by a member of site staff.
- auditor safety - travel in some parts of the world, needs careful security measures and arrangements, such as local guides provided by the site to ensure personal safety
- a transitory workload with intermittent operations, such as fish canneries where production will be dependent on the arrival of a ship or influenced by the weather

In all such cases full details shall be discussed with BRCGS in advance of the audit to agree best practise. Where necessary a concession may be agreed.

## 5.9 Changing certification schemes

The GFSI benchmark requires sites changing between schemes to remain on the same unannounced audit frequency (i.e. at least once every 3 years). Therefore, where a site certificated to a GFSI benchmarked standard changes scheme, the certification body will need to be aware of the audit history and plan accordingly.

## 6. Where can I find more information?

The BRCGS team will be pleased to provide advice as required. Contact [brcgs.integrity@lgcgroup.com](mailto:brcgs.integrity@lgcgroup.com).

## Appendix 1

The following examples show typical scheduling of the unannounced audit for sites within the announced and blended announced audit programmes:

### 1. Example audit schedule for a new site in an announced audit programme:

| <i>Announced/unannounced</i>                                                                        | <i>Audit date</i>                                                     | <i>(Refer to section 4.2)</i> |
|-----------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------|-------------------------------|
| Site opts for announced audit programme. But is required to have 1 unannounced audit every 3 years. |                                                                       |                               |
| First audit at site (Announced)                                                                     | 1- 2 June 2022                                                        | 1 June 2023                   |
| Re-audit (Announced)                                                                                | 22 – 23 May 2023<br>(audit within 28 days prior to audit due date)    | 1 June 2024                   |
| Certification body informs the site that an unannounced audit will occur in 2024.                   |                                                                       |                               |
| Re-audit (Unannounced)                                                                              | 4 – 5 March 2024<br>(audit within 4 months prior to audit due date)   | 1 June 2025                   |
| Re-audit (Announced)                                                                                | 19 - 20 May 2025<br>(audit within 28 days prior to audit due date)    | 1 June 2026                   |
| Re-audit (Announced)                                                                                | 20 – 21 May 2026<br>(audit within 28 days prior to audit due date)    | 1 June 2027                   |
| Certification body reminds the site that an unannounced audit is required in 2027.                  |                                                                       |                               |
| Re-audit (Unannounced)                                                                              | 10 – 11 March 2027<br>(audit within 4 months prior to audit due date) | 1 June 2028                   |

## 2. Example audit schedule for a new site in an announced audit programme achieving grade C during their food audits (i.e. site with a 6-month audit schedule):

| <i>Announced/unannounced</i>                                                                        | <i>Audit date</i>                                                       | <i>(for the next audit)<br/>Sites obtains a grade C/C+ at each audit</i> |
|-----------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------|--------------------------------------------------------------------------|
| Site opts for announced audit programme. But is required to have 1 unannounced audit every 3 years. |                                                                         |                                                                          |
| First audit at site (Announced)                                                                     | 1- 2 June 2022                                                          | 1 December 2022                                                          |
| Re-audit (Announced)                                                                                | 21 - 22 November 2022<br>(audit within 28 days prior to audit due date) | 1 June 2023                                                              |
| Re-audit (Announced)                                                                                | 22 - 23 May 2023<br>(audit within 28 days prior to audit due date)      | 1 December 2023                                                          |
| Re-audit (Announced)                                                                                | 20 - 21 November 2023<br>(audit within 28 days prior to audit due date) | 1 June 2024                                                              |
| Certification body informs the site that an unannounced audit will occur in 2024.                   |                                                                         |                                                                          |
| Re-audit (Unannounced)                                                                              | 4 - 5 March 2024<br>(audit within 4 months prior to audit due date)     | 1 December 2024                                                          |
| Re-audit (Announced)                                                                                | 18-19 November 2024<br>(audit within 28 days prior to audit due date)   | 1 June 2025                                                              |

### 3. Example audit schedule for a seasonal site in an announced audit programme

This amended protocol is only used where the audit due date is set at the beginning of the season, and therefore it is not possible to complete an unannounced prior to the audit due date because of a lack of production (e.g. prior to season and therefore no production taking place). Refer to section 5.7 for full details for planning an unannounced audit at a seasonal site.

| <i>Announced/unannounced</i>                                                                                   | <i>Audit date</i>                                                                                                                                                                                                                        | <i>Audit due date</i> |
|----------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|
| Site opts for announced or blended audit programme. But is required to have 1 unannounced audit every 3 years. |                                                                                                                                                                                                                                          |                       |
| First audit at site (Announced)                                                                                | 1- 2 June 2022                                                                                                                                                                                                                           | 1 June 2023           |
| Re-audit (Announced)                                                                                           | 22 – 23 May 2023<br>(audit within 28 days prior to audit due date)                                                                                                                                                                       | 1 June 2024           |
| Certification body informs the site that an unannounced audit will occur in 2024.                              |                                                                                                                                                                                                                                          |                       |
| Re-audit (Unannounced)                                                                                         | 1st - 2nd July 2024<br>(site is allowed a late audit up to 6 weeks after the audit due date for seasonal unannounced audits. Subsequent audit due date is allowed to be realigned with season but no longer than an additional 12 weeks) | 14 August 2025        |
| Re-audit (Announced)                                                                                           | 23 – 24 July 2025<br>(audit within 28 days prior to audit due date)                                                                                                                                                                      | 14 August 2026        |
| Re-audit (Announced)                                                                                           | 1 – 2 August 2026<br>(audit within 28 days prior to audit due date)                                                                                                                                                                      | 14 August 2027        |
| Certification body reminds the site that an unannounced audit is required in 2027.                             |                                                                                                                                                                                                                                          |                       |
| Re-audit (Unannounced)                                                                                         | 12 - 13 July 2027<br>(site is allowed a late audit up to 6 weeks after the audit due date for seasonal unannounced audits)                                                                                                               | 14 August 2028        |