



Key Changes – Position Statements

Key Changes Summary

The following amendments have been made across three Position Statements to align with the GFSI Benchmarking Requirements (BMR) 2024. These changes are **effective from 10 August 2026**. Certification bodies and certificated sites should familiarise themselves with these changes, which will be assessed against the updated requirements.

Agents & Brokers (AB310)

Clause 2.7.1 - Reinforcing the role of prerequisite programmes in risk analysis

An important clarification has been introduced in clause 2.7, strengthening the relationship between prerequisite programmes and hazard and risk analysis.

The updated wording now makes explicit that appropriate prerequisite programmes must be in place prior to conducting the risk analysis, and that any existing control measures or monitoring activities within these programmes should be documented and taken into account during the development and review of the plan.

In practical terms, this reinforces an important principle: risk analysis should not be developed in isolation, but must be underpinned by the existing foundational controls within the business.

The associated interpretation further clarifies that prerequisite programmes form the basis of the hazard and risk management system, and, while not all elements require formal validation, they should be effective and, where appropriate, verified to ensure they continue to support hazard control.

Clause 3.6.1 - Clarifying expectations for product specifications

The update to clause 3.6.1 provides additional clarity on what constitutes the “key data” required within product specifications.

The revised wording introduces explicit reference to technical parameters such as chemical, microbiological, physical or allergen standards, helping to standardise expectations across the supply chain.

The interpretation builds on this by confirming that specifications must include all information necessary for the safe use of the product, and that where such parameters are used for food safety purposes, they should be based on appropriate legislation or sound scientific principles.

This change supports a more consistent and robust approach to specification management, ensuring that both sites and auditors have a clearer understanding of what is expected.

Clause 4.3.1 - Introducing explicit competence for product defence activities

The updated clause 4.3.1 includes an explicit requirement to address the competence of personnel involved in product security and food defence assessments.

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The updated clause requires that individuals engaged in these activities understand the associated risks and the principles of product defence, and that any legal training requirements are met.

The interpretation emphasises that competence is not defined by a single route, and may be demonstrated through a combination of training, experience or practical effectiveness. Where internal expertise is limited, the use of external specialists is acceptable.

This change aligns the Standard more closely with GFSI expectations by ensuring that risk assessments are carried out by suitably knowledgeable personnel, rather than being treated purely as procedural exercises.

Clause 4.8.2 - Strengthening competence in vulnerability (food fraud) assessments

The updated clause 4.8.2 introduces a requirement for personnel involved in vulnerability assessments to demonstrate knowledge of product fraud risks and assessment principles.

The intention is to ensure that vulnerability assessments are not only completed, but are meaningful and informed by appropriate expertise.

The interpretation highlights that competence may be demonstrated through formal training, internal knowledge or experience, and encourages a multi-disciplinary approach, recognising that valuable input may come from technical, purchasing and supply chain functions.

Where necessary, external support may again be used to ensure that assessments are robust and credible.

Food Safety (F926)

Clause 7.4.2 – Reinforcing requirements for protective clothing and footwear

The update to clause 7.4.2 introduces an explicit requirement that protective clothing must include, where necessary, snoods for facial hair and suitable protective footwear.

This clarification ensures that all potential sources of contamination are addressed more consistently, particularly in environments where there is a higher risk associated with personnel movement and product exposure.

The interpretation places specific emphasis on protective footwear, confirming that it must be issued and worn where required to prevent product contamination, while also supporting hygiene and safety standards within the facility.

This reinforces the expectation that protective clothing requirements are not limited to garments alone, but extend to all elements of personnel protection that may influence product safety.

Storage & Distribution (SD404)

Clause 3.5.1.2 – Strengthening supplier specifications

The update to clause 3.5.1.2 clarifies that supplier specifications must include relevant technical parameters, such as chemical, microbiological, physical or allergen standards,

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where applicable. This ensures that product safety considerations are explicitly defined within supplier agreements and aligned with both legal and customer requirements.

The associated interpretation reinforces that specifications must clearly define the service provided and the risks associated with it, ensuring that suppliers operate in a way that protects product safety, quality and legality. It also highlights that, where technical parameters are used for food safety, they should be based on appropriate scientific principles and reviewed regularly to ensure continued suitability.

Clause 3.5.2.1 – Reinforcing subcontractor agreements

The revision to clause 3.5.2.1 strengthens expectations for subcontractor agreements by requiring that product-handling conditions and safety-related parameters are clearly defined within contractual arrangements. This ensures that outsourced activities are controlled to the same level as those carried out directly by the site.

The associated interpretation reinforces that contracts must establish clear requirements for handling, storage and transport, reflecting the risks associated with the product. It further emphasises the importance of ensuring subcontractors operate to equivalent standards as the certificated site, supported by effective traceability and ongoing review of contractual arrangements.

Clause 3.5.3.1 – Introducing competence in vulnerability assessments

The update to clause 3.5.3.1 introduces an explicit requirement that personnel responsible for vulnerability assessments demonstrate knowledge of product fraud risks and the principles of vulnerability assessment. This ensures that such assessments are informed and robust rather than purely procedural.

The interpretation highlights that competence may be demonstrated through training, experience or the effective implementation of vulnerability assessments. It also recognises the value of a multi-disciplinary approach, drawing on expertise from different functions, and allows for the use of external specialists where internal knowledge is limited.

Clause 4.2.1 – Enhancing competence in product security (food defence)

Clause 4.2.1 has been updated to include a clear requirement that personnel involved in threat assessments and product defence plans are competent, with an understanding of product defence risks, the nature of the operations and the principles underpinning food defence.

The interpretation reinforces that competence is essential to the effectiveness of these systems and may be demonstrated through a combination of training and experience. It also highlights that specific training must be in place where required by legislation, and that external expertise may be used where internal capability is not sufficient.

Clause 6.1 – Clarifying equipment use and storage

The update to clause 6.1 makes clear that equipment must not only be suitable for its intended purpose but also stored in a manner that minimises the risk of contamination. This introduces a stronger focus on how equipment is managed beyond its immediate use.

The interpretation further clarifies that equipment must be maintained in a hygienic condition, be capable of effective cleaning and be stored in a way that prevents contamination risks,

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such as pest harbourage or cross-contamination. It also highlights the need to control the movement of equipment between different areas to prevent unintended risks.

Clause 6.4.5 – Strengthening cleaning equipment controls

The revised clause 6.4.5 introduces more detailed expectations for cleaning equipment, specifying that it must be hygienically designed, clearly identified for its intended use and cleaned and stored in a hygienic manner.

The interpretation reinforces that cleaning equipment itself must not become a source of contamination. It highlights the importance of suitable design, effective identification (such as colour-coding) and appropriate storage practices to ensure that cleaning activities maintain, rather than compromise, product safety.

Section 17 – Scope of contract processing operations expanded to include irradiation

The title and Statement of Intent of Section 17 have been amended to include irradiation within the scope of contract processing operations. The previous wording covered contract chilling, freezing, tempering, defrosting and high-pressure process operations only. Version 8 adds irradiation as a further operation that, where undertaken on pre-packaged product, must be carried out in accordance with product owner specifications and monitored to ensure product safety, legality and quality are not compromised. This represents a new obligation for any site performing contract irradiation operations under the Storage and Distribution Standard.

Clause 17.3 – Process monitoring requirements broadened

Clause 17.3 has been amended to broaden the process monitoring requirement from temperature recording equipment to the use of adequate process parameters. The updated clause now explicitly references real-time temperature, pressure and irradiation as examples of parameters to be monitored via recording equipment linked to an automatic failure alarm system or, where appropriate, manual checks. The previous wording referred only to temperature recording. This change aligns with the expanded scope introduced in Position Statement 19 and ensures that sites undertaking irradiation or high-pressure processing are required to monitor the relevant parameters, not solely temperature.

***New Position Statement - Global Standard Packaging Materials, Issue 7 (P708)**

The following amendments have been made to the Global Standard Packaging Materials, Issue 7, via Position Statement 708 version 1, to align with the GFSI Benchmarking Requirements (BMR) 2024. These changes are **effective from 10 August 2026**. Certification bodies and certificated sites should familiarise themselves with the updated requirements, which will be assessed from that date.

Clause 4.4.1: Site Security and Product Defence – Training of Personnel

Clause 4.4.1 has been amended to include an explicit requirement that where personnel are engaged in threat assessments and product defence plans, the individual or team responsible shall be appropriately trained, in accordance with clause 6.1. This addition confirms an expectation that was already implicit in the Standard and reinforces the importance of competency in this area.

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Clause 4.8.2: Housekeeping and Cleaning – Disinfection, Validation and Verification

Clause 4.8.2 has been amended to introduce two additional requirements. First, disinfection procedures shall now be implemented and maintained alongside cleaning, where appropriate. Second, cleaning procedures must be validated and verified to ensure that appropriate standards are achieved, based on consideration of the risks associated with the intended use of the finished product or activity. Cleaning activities shall not pose a risk to product safety.

Appendix 8 Glossary – Definition of Disinfection

The glossary has been updated to include a definition for disinfection, which was not previously included. Disinfection is defined as the process or act of destroying pathogenic micro-organisms, removing most organisms present on surfaces.