



**Global Standard
START!
ISSUE 2**

INTERPRETATION GUIDELINE

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Acknowledgements

Part I

Introduction

Welcome to the interpretation guideline for the BRCGS Global Standard START! (hereafter referred to as the START! programme). The interpretation guideline is designed to accompany Issue 2 of the Global Standard START! and should be read in conjunction with it. This publication helps in the understanding of each requirement of the START! programme and identifies methods of compliance.

This guideline is designed to help interpret the START! programme across all food sectors; however, the exact requirements for any particular product, process or site will be specific to that sector with specific technologies, hazards and legislative requirements to take into account while developing their food safety management systems. Users of the guideline are therefore cautioned not to rely solely on the information provided here. While adherence to the guideline does not specifically form part of the requirement to achieve certification to the START! programme (i.e. it does not form part of the audit requirements), companies will find it useful to take into account the topics addressed to demonstrate compliance to the programme requirements. Examples are given as points to consider but should always be used in context relevant to the business. Practices should be able to withstand challenge by an auditor and be in line with good industry practices.

How the programme is structured

Usually below the statements of intent are more specific and detailed requirements (clauses) that, if applied appropriately, will help to achieve the stated objective of the section. In some sections there are no detailed clauses, in which case the statement of intent acts as a clause. The site will be audited against the statement of intent.

The requirements have been set out as follows:

- **Basic only** Requirements for Basic level only. Sites at Intermediate level do not need to meet these requirements.
- **Basic and Intermediate** Requirements for both Basic and Intermediate levels.
- **Intermediate only** Requirements that only sites at Intermediate level must cover.

The audit for Intermediate-level certification will cover the statements of intent and all of the requirements listed as:

- Basic only
- Basic and Intermediate.

The audit for Basic-level certification will cover the statements of intent and all of the requirements listed as:

- Basic and Intermediate
- Intermediate only.

Depending upon the type of operations undertaken at the site, some clauses may not be applicable. The auditor will decide if a clause is not applicable.

Colour-coding of requirements

A production processes represents the key activities on site. The audit process gives specific emphasis to the practical implementation of food safety procedures within the factory and general good manufacturing practices. Auditing these areas forms a significant proportion of the audit (around 50% of the time is spent auditing production and site facilities, interviewing staff, observing processes and reviewing documentation in production areas with the relevant staff). Production areas include factory production, storage, dispatch, engineering, on-site laboratory facilities and external areas such as site security.

As an aid to this process, the requirements within the START! programme have been colour-coded (see Table 1). Similar to the Standard, colour-coding shows the activities that would usually be audited as part of the assessment of the production areas and facilities, and those that would form part of an audit of records, systems and documentation.

Table 1 Key to colour-coding of requirements

Audit of records, systems and documentation		
Audit of production facilities and good manufacturing practice		
Requirements assessed in both		

Audit evidence: how to demonstrate compliance

A statement of intent

There are sections within the START! programme where only a statement of intent for that particular section is applicable with no detailed clauses to follow (this is often the case with sites being audited at the Basic level). In this situation the site has the option to use any mechanism to demonstrate compliance to the auditor against the statement. This may include documents, procedures or verbal instructions. The auditor must verify the integrity of the system implemented to ensure it is effectively demonstrating compliance to the statement of intent and covers any food safety, legality, authenticity or quality risks, as appropriate. Where a site chooses to use the requirements from the next level of the START! programme or the Standard, the auditor must not raise a non-conformance purely on the basis that the evidence provided was not aligned to the expectation of the higher level but make an informed judgement based on the requirement of the statement of intent.

Documented procedures

The START! programme is a continuous journey for the development of a site's food safety and quality management systems. The due diligence for demonstrating compliance to regulatory authorities as well as BRCGS auditors is usually in the form of record keeping. At a basic level a site would be expected to have a system which can demonstrate compliance. This could be a mixture of instructions, documentation and written processes. As the site progresses to the next level there will be a requirement for more detailed and in-depth documented procedures. At this point evidence should be documented in the form of risk assessments, instructions, procedures and policies.

For the Standard there is an expectation of having documented procedures in place regardless of whether it is explicitly stated in the clause.

Evidence to the auditor

Achieving a particular requirement is based on evidence collected, observations made during the audit, and on the procedures expected within that industry sector. Examples explain the type of documents, records, procedures and evidence that an auditor would normally expect with respect to a certain requirement but the lists are not exhaustive. The level of non-conformity assigned by an auditor against a requirement is an objective judgement with respect to severity and risk and therefore may not be explicitly covered in this document. It is based on the evidence seen during the audit by the auditor, which in turn is independently verified by the certification body management.

Explanation of terms

Within the START! programme there are some specific terms and language used, and a good starting point for interpreting the Standard is to be familiar with these terms and their context. A full glossary is given in Appendix 8 of the Global Standard START!.

Annual frequency

Some requirements in the START! programme refer to an annual frequency for the completion of specific tasks. The aim of this specification is to ensure that the tasks are completed within a 12-month period since the last occasion when the activity was carried out (e.g. that the test of the system happens every 12 months).

Please note that there is a difference of 23 months between a test being completed in January of one year, and a subsequent test occurring in December of the following year. This would not meet the requirement for an annual frequency.

Appropriate

A number of clauses within the START! programme refer to the need to fulfil requirements 'where appropriate'. 'Appropriate' is defined as suitable for a particular condition or occasion, and requirements shall be met where it is an industry requirement or it is justified to do so.

A number of the requirements specify appropriate timescales, appropriate personnel etc., and thus contain a level of judgement. They are designed to provide a degree of flexibility to ensure the operation of policies or procedures that are right for the organisation and the risks associated with the specific products.

Risk assessment

Some clauses within the START! programme refer to risk assessments being the basis for developing appropriate control procedures, such as establishing a frequency for monitoring a control point. The underlying principle is to demonstrate that potential hazards have been considered by the site, and that relevant controls are applied. Risk assessment is typically defined as a systematic process of identifying the hazards that may be involved in a proposed product or process, determining their impact on food safety, authenticity, legality or quality, and designing an appropriate control or procedure to minimise the risk occurring.

During the course of the audit, the auditor will require evidence of these risk assessments, including how they were completed and evidence that the controls are justified and can stand up to robust challenge. Where a risk assessment demonstrates that further action is not required, it is important that this is documented, with a description of the justification.

Risk assessments do not need to be long, complicated documents; they must, however, demonstrate that all relevant aspects have been assessed. For example, there could be documents that identify the hazard, the risk of its occurrence and, where appropriate, the controls used or introduced to manage the risk; alternatively, this information may be incorporated within established procedures.

The START! programme does not prescribe a method for completing risk assessments. Sites are free to use their preferred techniques, which may include relevant electronic or physical tools, and there are many guidelines available (for example, the ISO 31000 Risk Management Guidelines). In many cases, industry best practice, where known and available, will help meet this requirement.

A risk assessment course is available from BRCGS, provided through a global network of approved training providers. More information is available from the training pages on the BRCGS website.

'Shall' versus 'may'

The style of the START! programme is generally one of guidance, to allow companies to ensure that all aspects of control have been considered, so that thorough and comprehensive systems may be developed. In some instances the programme requires that criteria must be included within a policy or procedure, and this is generally covered by the term 'shall'. If any of the points included are not covered adequately, a non-conformity will result.

However, there are also a number of clauses that provide examples or guidelines, generally preceded by the words 'may include' or 'should'. This information is provided as guidance for incorporation in company policies and procedures. It is the responsibility of the company to ensure that the auditor is satisfied that the system in place is appropriate.

Development and progression

BRCGS Professional

As a site progresses through the levels in its food safety journey they may wish to develop knowledge within their technical team by signing up to the BRCGS Professional programme. The programme improves key skills and core competencies, which in turn lead to improved efficiency and productivity within the workplace.

The programme is made up of training that covers all BRCGS Standards. Further details can be found in Appendix 7 of Global Standard START!.

Global Standard Food Safety (Issue 9) Interpretation Guideline

Sites who want to develop their technical knowledge and are preparing to implement the full Global Standard Food Safety will find this guideline a valuable tool for developing knowledge and understanding particular areas. The guidelines give detailed insight of key aspects of food safety and quality management processes. The publication is available from the BRCGS Store.

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