

F926: Food Safety, Issue 9

Position Statements

Document scope

Document Scope: Where clarification of interpretation of a requirement of the Global Standard Food Safety or its protocol is necessary, this will be published on the BRCGS website (www.brcgs.com), and BRCGS 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.

Standards the document is applicable to: Global Standard Food Safety, Issue 9.

Change log

<i>Version</i>	<i>Date</i>	<i>Description</i>
1	21 Dec 2023	*NEW* Position Statement 1 Clause 1.1.10- Update of site responsibility to ensure unannounced audits can be undertaken to protocol. *NEW* Position Statement 2 Sites may not change certification body in the 4-month audit window. *NEW* Position Statement 3 Clarification of the definition of 'initial audit'.
2	04 Apr 2024	UPDATE* Position Statement 1 Minor corrections.
3	27 Jul 2024	*UPDATE* Position Statement 1 Clause 1.1.10 - to provide additional clarification. PART III – 4.7.1- updated voluntary unannounced audit protocol *UPDATE* Position Statement 2 Clarification of 4-month period *UPDATE* Position Statement 3 Format changes.
4	27 Apr 2026	Effective from 10 August 2026 Minor amendments related to wording in Position Statements 1, 2 and 3 Updated to align with the GFSI Benchmarking Requirements v.2024 *NEW* Position Statement 4
4.1	06 Oct 2026	Rebranded document.

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Position statement 1

Change to clause 1.1.10

BRCGS previously published this position statement indicating that from 1 May 2024 the text for clause 1.1.10 was updated to the following:

1.1.10	Where the site is certificated to the Standard, it shall ensure that announced or blended announced recertification 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 the unannounced audit can be undertaken in accordance with the protocol.
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Interpretation

Please note, that this position statement applies to all audits for the Global Standard Food Safety, Issue 9, and to all audit options, including both voluntary and mandatory unannounced audits.

Certification bodies will discuss audit options (announced, mandatory unannounced, voluntary unannounced), with sites and notify them which year a mandatory unannounced audit will take place (the actual date of the unannounced audit will not be communicated to the site). This discussion must occur within 3 months following the last audit, to ensure that the site knows if an unannounced audit will take place in the coming year.

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 (this includes both voluntary and mandatory unannounced audits), 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.

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 moved to accommodate the 'late start' and the unannounced audit may be completed at any time in the following 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.

As a consequence, Section 4.7.1 of the audit protocol (Part III, Section 4) Scheduling re-audit dates for the voluntary unannounced audit programme is also amended as follows:

4.7.1 Scheduling re-audit dates

The site can choose whether to:

- remain within the unannounced programmes (fully on site)
- revert to the announced audit programme (fully on site or blended).

If the site wishes to remain in an 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. 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 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. However, the site is responsible 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.

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 moved to accommodate the 'late start' and the unannounced audit may be completed at any time in the following 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.

If the site wishes to withdraw from the voluntary unannounced audit programme, the next audit will be scheduled to occur within the 28 calendar 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. Where the site received a grade of C+ or D+ at the last audit and wishes to withdraw from the voluntary unannounced audit programme, the next audit due date will be 6 months after the last audit date, and the audit will occur within the 28 calendar days prior to this date.

Effective date: 1 August 2024

Position statement 2

Changing certification body

There are a number of arrangements to be made by both a site and its chosen certification body to ensure a BRCGS audit is undertaken to the correct protocol.

The protocol requires that within 3-months of the previous audit date, the site either opts into the voluntary unannounced programme or if within the announced or blended announced programme that the certification body will communicate to the site whether the next audit will be announced or unannounced.

A site may choose to change to a different certification body from its current certifying body. However, changes will not be permitted 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.

Effective date: 1 May 2024

Position statement 3

Update to Appendix 10 - Glossary

Definition of 'initial' audit

Currently, the BRCGS Global Standard Food Safety, Issue 9 defines an initial audit as:

<i>Term</i>	<i>Definition</i>
Initial audit	The audit for certification to a BRCGS standard at a company or site that is not in possession of a valid certificate. This may be the first audit at a site or a subsequent audit of a site whose certification has lapsed.

This definition has been updated to:

<i>Term</i>	<i>Definition</i>
Initial audit	The first BRCGS audit at a specific site address or audit carried out at a site where the previous certificate has lapsed for more than 24 months.

It should be noted that this change impacts the requirement for an unannounced audit to be undertaken at least once in every 3 years. This 3-year cycle will continue irrespective of a lapse in certification as specified for 24-months.

Effective date: 1 January 2024

Position statement 4

Update to clause 7.4.2

7.4.2	Protective clothing shall be available that: • is provided in sufficient numbers for each employee • is of suitable design to prevent contamination of the product (at a minimum containing no external pockets above the waist or sewn- on buttons) • fully contains all scalp hair to prevent product contamination • includes the following, where required, to prevent product contamination: • snoods for beards and moustaches • suitable protective footwear
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INTERPRETATION

The amendment to clause 7.4.2 (in bold, above) is a result of the assessment of the Standard against the GFSI Benchmarking Requirements v.2024.

Protective footwear

Appropriate protective footwear must be issued and worn to prevent product contamination and to maintain the highest standards of hygiene and safety within the facility.

Effective date: 10 August 2026