BRCGS Food Safety

Global Standard
FOOD SAFETY
ISSUE 9

FREQUENTLY ASKED QUESTIONS

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Issue 1

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Introduction

A new issue of a standard often generates questions as sites, certification bodies and specifiers ensure they understand the new requirements. The most frequently asked questions relating to the Global Standard Food Safety (Issue 9) (referred to as the Standard) are detailed in this document.

BRCGS also operates an enquiry service. If you are unable to find an answer to your particular question, please contact BRCGS.enquiries@lgcgroup.com.

General questions – background

Why did BRCGS issue a new standard?
Food safety does not stand still. New risks, legislation and practices to improve food safety are continually emerging so as a matter of principle the BRCGS global standards need to be periodically reviewed and updated. The most significant changes in the updated Standard concern:

- Further development of product safety culture
- Compatibility with the Codex General Principles of Food Hygiene, and benchmarking to the Global Food Safety Initiative (GFSI) benchmarking requirements
- Expansion of audit options, inclusion of information and communication technology (ICT)
- Updating requirements associated with core product safety activities(internal audits, root cause analysis, preventive actions and incident management)
- Greater clarity for sites completing animal primary conversion and producing animal feed.

How do I download a copy of the Standard and associated documents?
The Standard is available to download from the BRCGS Store. Access to all the Standards and guidelines published by BRCGS are also available on our online information management platform, Participate. Register via lgcassure.com.

An Interpretation Guideline and a Guide to Key Changes are also available. The items are available to purchase on the BRCGS Store or can be downloaded from Participate.

What languages is the Standard available in?
The Standard is currently available in:

- Brazilian/Portuguese
- Chinese
- Dutch
- English
- French
- German
- Italian
- Korean (please note this version is only available on Participate)
- Polish
- Spanish
- Turkish

An Auditor Checklist and Site Self-Assessment document is available in Thai and Vietnamese.

Please note: while translated versions of our standards are peer reviewed there are likely to be differences in the interpretation of words and phrases. For this reason the English version of the Standard will be considered the definitive edition for audit purposes.

What is the difference between the Guide to Key Changes and the Interpretation Guideline?

The Guide to Key Changes introduces the Standard and provides a list of the main changes made to the requirements. It is useful when updating quality systems in preparation for an audit against Issue 9.

The Interpretation Guideline is designed to be used in conjunction with the Standard and will help you understand and comply with individual requirements. It provides more information and detail for each clause.

How do I keep up to date with any changes to the standard?

During the lifetime of a published Standard, BRCGS may be asked to either review the wording of a clause or provide an interpretation of a requirement or rule. The decision made by BRCGS is known as a position statement. Position statements are binding on the way that the audit and certification process is carried out and are seen as an extension to the Standard.

Position statements are notified to sites and certification bodies through regular newsletters and are posted on the BRCGS website and on Participate. Make sure you are signed up to receive our newsletters and visit Participate regularly to check for updates.

The primary position statement to read is Global Standard Food Safety (Issue 9) Position Statements (F926).

Where can I find the Auditor Checklist and Site Self-Assessment Tool for the Standard?

You can find this document on the BRCGS website and on Participate.

Can I use the Auditor Checklist and Site Self-Assessment Tool for my internal audits?

While we hope that this tool is useful in helping your site prepare for a certification audit it should not be considered as evidence of an internal audit and will not be accepted by auditors as such. You should not only use this document to prove conformity to the clauses, but should have objective evidence, documentation procedures and policies in place which can be referenced.

Which category should I list my product under?

This is dependent upon several factors, but Appendix 6 of the Standard aims to help you with which category matches your product.

If your product follows a particular technology process but is not listed within a specific category, select a category which best suits the product. For example, plant-based dairy alternatives using the same dairy processing as cheese could sit under category 7, Dried animal feed would be similar to dried pet food and this can be found under category 15 dried food and ingredients. However, you should ensure you make an accurate selection so your certification body can provide an auditor with the correct product knowledge. If in doubt, consult with your certification body.

Why has BRCGS included food authenticity across the Standard?

Food authenticity has been included into various requirements to ensure consistency, however the glossary definition remains the same from Issue 8 of the Standard where "food authenticity is ensuring that food or raw materials purchased and offered for sale, are of the nature, substance and quality expected".

Where can I find the certificate template?

Certification bodies can find a blank template to complete following certification audits in MyBRCGS.

Certificated sites can find their completed audits in the BRCGS Directory.

Questions relating to audit protocol

1. Audit duration

What is the minimum length of time for an audit?

The average duration of an audit is 2–3 days at the site (typically 8–9 hours/day, but never in excess of 10 hours/day). Announced audits are usually on consecutive days, although there may be circumstances when this is not the case.

The calculation for the audit duration is based on:

- the number of employees – as full-time equivalent employees per main shift, including seasonal workers
- the size of the manufacturing facility, including on-site storage facilities
- the number of HACCP plans (or food safety plans) included within the scope. For the purpose of the calculator, a plan corresponds to a family of products with similar hazards and similar production technology.

BRCGS recognises that other factors may also influence the calculation but are considered less significant and therefore shall not influence the audit duration by more than 30% of the total calculated audit time.

For further information please check the Audit Duration Calculator (F929), which is downloadable from Participate.

2. Additional modules

What are additional modules?

Additional modules enable sites to demonstrate compliance with requirements that meet specific market or customer requirements. They are audited alongside the full Standard, thus reducing the number of separate audits at a site.

The modules cover additional services that your site provides. Certification to additional modules is voluntary and they do not need to be included in the audit. However, your certification body should ensure any product safety and quality risks from the exclusion are assessed during the audit and exclusions are captured on the audit report.

There are three additional modules available for Issue 9 of the Standard. Let your certification body know if you want a module added to the scope of the audit.

- Module 10 – Global GAP Chain of Custody
- Module 11 – Meat Supply Chain Assurance
- Module 13 – Meeting FSMA Requirements for Food

Are additional modules managed differently and are they accredited?

If the audit of the module is completed at the same time as the main BRCGS audit, then the information is included in the main audit report. Separate audit reports are used when there is a standalone audit against the module.

Some BRCGS additional modules are not accredited. The BRCGS certificate includes the accreditation body logo and the certificate can only include items that are included in the accreditation scope. If a module is not accredited, then it isn't added to the full audit certificate.

3. Audit scope

Do we need to add into the scope what functions were audited at head office?

The scope of the audit must include all products produced and manufacturing processes, this should be agreed with your certification body.

Where the audit includes additional locations or a head office, this shall conform to the rules set out within the Standard appendix 4 and the scope shall include reference to those different addresses, for example:

'Baking of sliced fresh bread incorporating head office audit at Office A, B street, Italy'

Please follow guidance in the BRCGS document Designing Certification Scope which can be found in MyBRCGS.

Can more than one site be included under a single certification?

More than one site may be included under a single certification by exception only. It is only allowable where sites:

- sit under the same organisation ownership
- operate against the same QMS
- manufacture product part of the same manufacturing process
- solely supply other sites and no other customers
- are within 30miles/50km of each other.

How do we define traded products within the certificate scope?

Where traded products are included within the scope of the audit, the scope shall describe the products traded as 'the trading of …….'. Products should be 'grouped' using clearly defined, recognisable and internationally understandable product types. General terms such as 'dairy' or 'meat' should include clarification of the types of products e.g. dairy products such as yogurts, cream, ice cream, soft cheese, milk etc; or red meat including pork, beef and game (pheasant and rabbit).

4. Change of certification body

As a site, can we change our certification body and get an earlier re-audit?

To do this, contact your current certification body (CB1) with the relevant information and reasons why you are looking to change. You can also contact your alternative certification body (CB2) with the same information.

CB 1 or CB2 can then submit a concession request to BRCGS. The CB will let you know if the concession request has been granted. All correspondence should go via the certification bodies and not via BRCGS.

If we change certification body in the year of an unannounced audit, how does this affect the contract period?

Please refer to BRCGS document Position Statement and Protocol on Unannounced Audits (BRCGS079) in which we highlighted that sites may not change certification body in the 4-month audit window.

It is the site's responsibility to ensure unannounced audits can be undertaken to protocol.

5. Logo use

We are certificated to the Standard. Can suppliers that use us, but are not certificated themselves use the BRCGS logo?

No, the BRCGS certificate only applies to the site audited, therefore the logo cannot be used by their customers. The company cannot display the logo on any of their own marketing materials or website. However, they can state in their marketing materials that they use a certificated site.

As a certificated site, can we use the BRCGS logo on vehicles?

Companies that achieve certification and have no exclusions from their scope may use the logo on vehicles.

Can we use the BRCGS logo if we have exclude traded products from the scope?

For information, see Part III, Section 6.7 of the Standard. If you have traded products (excluded or included within the scope) you can still use the logo, but need to ensure that the logo is not used specifically for promoting traded products. audited. For example, if you have a web page for traded products – the logo should not feature on that page.

6. Audit reports

Which date is required on the audit report?

The re-audit due date shall be calculated from the date of the first day of the initial audit, therefore the previous audit's start date (irrespective of whether further site visits were made to verify corrective actions arising from the initial audit) and not from the certificate issue date.

7. Auditor qualifications

Which type of auditor training certificate is acceptable for auditors?

The auditor must have a recognised auditor qualification. Examples include: a management system lead assessor course (e.g. IRCA registered), ASQ Certified Quality Auditor or Exemplar Global qualification and the BRCGS Lead Auditor course delivered by a BRCGS-approved trainer. Other GFSI-benchmarked certification programmes, such as the Safe Quality Food (SQF) and International Featured Standards (IFS) lead auditor training, are also accepted.

The auditor is also required to complete a HACCP qualification (of at least 2 days) and the Global Standard Food Safety (Issue 9) qualification.

Auditors can find more guidance on BRCGS document F915, Requirements for Auditor Competence.

As a certification body, I need to send all staff members for auditor training?

All staff with a key role in the certification process i.e. the review of reports and/or corrective actions shall have completed appropriate BRCGS training and should staff deciding the audit outcome i.e. the 'certification decision'. Where certification decisions are made by a committee at

least one member of the committee shall have attended the appropriate BRCGS course delivered by a BRCGS Approved Training Provider (ATP) and passed the relevant examination.

If a particular staff member is responsible for the review of audit reports, but they are not the official certification decision maker then they can undertake any sort of training that you deem appropriate – this could be in the form of internal training.

The 3-day BRCGS auditor training course is designed for new auditors. All available training is listed on our website, however for specific queries you can contact the training department brcgs.training@lgcgroup.com.

8. Unannounced Audit

If there is an unannounced audit, what would be the course of action if:
A. there is an unexpected breakdown and there is no production?
B. there is no production due to lack of product at a seasonal site?
C. There is a regulatory audit occurring at the same time?
A. Certification bodies are trained and experienced in managing unexpected and emergency situations. For example, if there was no production for the first part of the audit, it may be possible to organise the audit and concentrate on documentation, until production was able to recommence (assuming that it was expected to start within the time period the auditor was due to remain onsite).

B. In the case of a seasonal site, the correct, and up-to-date flow of information between the site and the certification body is vital, to facilitate the best audit planning possible and minimise the risk auditors arriving on non-production days. Where your certification body believes that there are genuine challenges to completing an unannounced audit, it should discuss these challenges with BRCGS in advance of the audit, to agree a suitable approach. In extreme situations a concession may be granted.

C. The same principles apply, as discussed above. If the regulatory audit (or customer audit) was announced, then the dates should have been communicated to the certification body in advance. Obviously, it is more challenging if the regulatory authority is completing unannounced audits.

In all these situations, you should have an open discussion with your certification body in advance of the actual audit – it is a lot easier to plan, and have agreed ways of working if all the concerns have been discussed before the audit starts. While that doesn't prevent unexpected or emergency situations, but it does ensure that everyone is well prepared and understands the options.

If we choose the blended audit option, how does the requirement to have a mandatory unannounced audit every 3 years work?
A blended option is only available if you chose an announced audit option. You can choose a fully unannounced audit or part unannounced/part announced in the year of the mandatory unannounced audit.

For mandatory unannounced audits, are non-audit dates allowed for seasonal sites?
There are two unannounced audit programmes in the Standard:

- Voluntary unannounced programme.
- Announced audits with a mandatory unannounced at least every 3 years.

Wherever possible we have aligned both audit programmes to make the protocol the same, for example, we have made the audit window for both types of unannounced audits equal to 4 months prior to the audit due date.

However, the requirements for seasonal sites in the voluntary unannounced audit programme are different from seasonal sites completing a mandatory 1 unannounced audit every 3 years. Seasonal sites in the voluntary unannounced programme should refer to section 4.7.2 of the audit protocol and no dates may be excluded within the production season.

Sites that are completing a mandatory unannounced audit should refer to Section 2 of the audit protocol and further details can be found in our position statement Protocol on Unannounced Audits: Meeting the GFSI Benchmark (BRCGS079) section 5.7. This document states the rationale where non-audit dates are allowed in this instance. Sites which have seasonal production and are on the announced audit programme (with mandatory 1 in 3 unannounced) must refer to this position statement.

Questions relating to specific requirements of the Standard

1. Senior Management Commitment

What qualifications are required to demonstrate competence to measure, monitor or change food safety culture?

No specific qualifications are required for competence to food safety culture. However, a wide range of activities could be included into the culture development plan to include training. It should be noted that the Standard does not mandate this and only gives sites examples which can include training to develop the attitudes and positive approach to product safety and processes of the staff members which includes the training and staff development beyond just training the procedure out to staff.

There is a guideline on product safety culture which may be purchased from the BRCGS Store or found on Participate.

Is maintaining food safety culture a technical manager's responsibility?

Although product safety culture is led by senior management and the technical/quality team, it is unlikely to be successful if it is viewed solely as a technical function. Culture relies on an ethos and values felt by all staff at all levels at your site. The size and complexity of the site should not be a barrier to a successful culture.

What are auditors looking for when auditing the food safety and quality culture clause?

Auditors are not expected to audit 'food safety culture' of the site, but the evidence of compliance with the requirements of the clause. Therefore, the auditor will examine evidence of non-conformity with this requirement during both the audit of the facilities and the documentation audit. This will be achieved by:

- Reviewing the documented plans and records
- A discussion with the senior management on development and implementation of plan
- Discussions across all levels of personnel – expecting to find awareness of food safety culture – how individuals can impact it and the company objectives
- Evidence of the site completing its action plan
- Timescales of evidence that have been met

- Monitoring and review processes and results from previous activities.

Auditors are expecting to see evidence that activities are being completed each year during which the plan is designed to operate.

2. The Food Safety Plan - HACCP

What clauses have been updated in line with the new Codex requirements?
Clause 2.12.1 is a new requirement which reflects the recommendation from Codex Alimentarius General Principles of Food Safety for the validation of Food Safety Controls. Changes to the HACCP or food safety plans which may affect product safety, must be checked to ensure they effectively control the identified hazard before implementation.

Does the HACCP plan need to address outsourced processing or should it include all activities from the service provider/s too?
The HACCP plan should signpost outsourced processing, all other activities from the service provider would not be required as they fall outside of the requirements of the Standard.

3. Food Safety and Quality Management System

Clause 3.5.1.5: Should the site be aware of the name of the last manufacturer if a product is purchased from an agent or broker?
If the agent or broker is certificated to a GFSI benchmarked standard (such as the Global Standard Agents and Brokers) then the site needs to know the identity of the last manufacturer, packer, processor, etc of the material. The requirement to approve this site is not applicable as the requirements of the Standard they are certificated to ensures effective systems for supplier approval and traceability are in place.

Clause 3.5.1.6: What is the update with regards to traceability back to manufacturers when purchasing from agents and brokers?
The amendments to this clause reflect additional requirements to be completed where the approval of the raw material is purchased from an agent and is based on a questionnaire, updates reflect on consistency with other requirements within this section and is based on feedback from the Standard users and the working group.

Although it is an option to meet the requirements, the Standard does not mandate a full traceability back. Firstly, the requirement only applies where the agent/broker is not certificated or audited. Secondly, if the manufacturer is certificated to a GFSI benchmarked Standard, then evidence of this certification would meet the requirements of the clause. Finally, the clause states this verification 'may' be achieved by a traceability test.

The Interpretation Guideline highlights some options for how the verification could be achieved.

Section 3.5.4: If a product is sent to a subcontracted warehouse for storage and not returned to the site after the outsourced process does this section still apply?
If a product is not returned to the site after the "intermediate step" or outsourced process, then management of outsourced processing (section 3.5.4) does not apply, however section 3.5.3, management of suppliers of services, would apply.

If a subcontracted warehouse is on a different site, and doesn't affect the production process, the site/certification body should apply section 3.5.3 and not section 3.5.4.

See the interpretation Guideline for more information, particularly figures 12 and 13.

Clause 3.5.4.2 and 3.5.3.3: Is the wording on these clauses the same and is this an error?

The two clauses are for different sections within the standard.

- 3.5.3.3, sits under management suppliers of services.
- 3.5.4.2, refers to outsourced processing (or subcontracted processing) which is an intermediate step.

They have been split to ensure that both sections are completed. The intention is for a documented process for the ongoing performance of suppliers of services and outsourced processing is implemented as necessary. The process should be based on risk and defined performance criteria.

Clause 3.9.3: What is meant by "For food raw materials and finished products (i.e. including printed packaging and labels with food safety and legal information), the test of the traceability system shall include a quantity check/mass balance"?

We have amended the requirements of this clause so that all sites are clear that all printed packaging and labels with food safety and legal information must be considered alongside raw materials and finished products, it included all labels printed offsite or onsite.

4. Site standards

Section 4.2: Where is the food defence guidance?

BRCGS will publish additional guidance on food defence in the future. While not specific to food defence you may find the site Auditor Checklist and Site Self-Assessment useful in the meantime. The checklist can be downloaded from Participate.

Clause 4.2.1: What are the requirements for food defence training?

This requirement ensures competency of the food defence team. Where there is a legal requirement for specific training, this shall be in place, for example, in sites complying with FSMA are expected to be able to demonstrate this has been appropriately completed. The Standard is not prescriptive regarding how this knowledge is demonstrated and it can be achieved via a training course in food defence.

Where in house knowledge is not present, external expertise may be used.

Clause 4.6.4: What is meant by and what are the requirements of static equipment?

Static equipment is defined as pieces of equipment that are not ordinarily moved or are moved only in exceptional circumstances. The requirement ensures that the movement and repositioning of static equipment ensures food safety and the integrity of the equipment is maintained.

Clause 4.11.4: Does a mock withdrawal fully test the procedure? Does a separate mock withdrawal and mock recall need to be completed?

The mock withdrawal and recall does not need to be completed separately if either fully tests the incident management procedures and all records are maintained, analysis of effectiveness is carried out and areas of improvement identified and acted upon as this would fulfill the requirement. As per 3.11.3, a test of these procedures must be initiated at least annually to ensure their effectiveness.

Clause 4.13.3: Are all by-products for animal feed now considered animal feed? Does Section 5.8 requirements now apply to these products?

By-products or waste products from food manufacturing can continue to be handled using clause 4.13.3, but where the site is deliberately manufacturing animal feed then section 5.8 can apply.

Clause 4.14.10: Who can complete the in-depth pest management assessment?

This can be completed by the field biologist. You must ensure they are appropriately experienced and qualified and have suitable equipment to carry out the assessment effectively – i.e., torch, spatula, and tools such as screwdrivers, etc.

A sufficient number of in-depth assessments must be scheduled throughout the year. The actual number must be based on risk assessment, but there must be at least one per annum. Where appropriate, the field biologist must ensure that these assessments are targeted for relevant seasons or activities (for example, to allow access during shutdown periods, or consider seasonal activities such as fresh produce packing).

Set out clear objectives for the assessment and ensure the content of the report, and trending documentation, covers all relevant areas and pests. Review reports and, where necessary, implement actions and sign them off in a timely manner. A time limit should be set for report turnaround. Ideally this should be between 7-10 days to ensure that any comments or recommendations remain relevant.

Any urgent issues should also be highlighted before leaving the site for immediate action as necessary.

5. Product control

Section 5.3: If we only manufacture pet food or animal feed is the management of allergens applicable?

Pet food and animal feed manufacturers certificated to the Standard are required to meet the appropriate allergen management legislation in the country of intended sale of the products. If there is no legislation relating to allergens in pet food/animal feed, this section may be considered 'not applicable' if the feed is destined for those countries.

In some parts of the world, allergen claims (e g. gluten- or dairy-free) are made on pet food or animal feed products. Where you make an allergen claim on a pet food or animal feed, you are required to meet all of the requirements within section 5.3.

As animal feed ingredients fall within the Standard now, how do scope exclusions work for animal feed ingredients?

The scope of the Standard now includes animal feed and would, for example, include ingredients for use by food manufacturers. If the site also manufactures these ingredients at the same address as their (human) food products and wishes to exclude them, according to Section 1.6.2 of the audit protocol:

The exclusion of products produced at a site will only be acceptable where:

- the excluded products can be clearly differentiated from products within scope and
- the products are produced in a physically segregated area of the factory.

If both bullet points apply, then your certification body must agree to this prior to the audit and it will be clearly stated on the audit report and certification (record justified on the audit report).

Otherwise, both types of products can be listed within the scope of the audit. Both product categories will need to be listed and the certification body must provide an appropriate auditor to audit both categories.

Clause 5.4.3: Does the vulnerability risk assessment include packaging materials?
This section applies to food raw materials and ingredients so packaging does not need to be considered under section 5.4. Further guidance can be found in the BRCGS guideline Understanding Vulnerability Assessments.

6. Process control

Clause 6.2.1: Is it mandatory to consider a quantity check or mass balance on every primary material, to include label reconciliation?
The mass balance or quantity check is intended to measure the amount of ingredient that has been purchased, compared with amount used, and amount of product produced. If these measures don't align then a problem is indicated – it may be fraud, a mis-labelling incident or a production error, any of which could lead to a product withdrawal or recall – if so, a mass balance should be completed.

If a risk assessment determines that a risk is identified with labels, primarily between being printed and being attached to customer packaging and more are printed than used on customer products, then there needs to be an assessment of where they go, such as label reconciliation, and how they site avoids a mis-labelling incident (e.g. if left on the production line and inadvertently used on the next product).

6.4: What are the calibration requirements required by the Standard?
BRCGS does not specify this level of detail within the Standard. The Standard only ensures that you are able to demonstrate that measuring equipment is sufficiently accurate and reliable to provide confidence in measurement results.

There are various clauses under Section 6.4 of the Standard, which require sites to identify and control measuring equipment, ensure calibration checks are completed and reference equipment is calibrated to a national/international standard and if equipment is outside of specified limits that action is taken and recorded.

You may find it useful to look up the national/international standards which would relate to the individual calibration in the country of sale and/or contact laboratories which may specialise in this.

7. Personnel

Clause 7.4.3: Can non-protective clothing in an open product area be taken home for washing?
The Standard allows home laundering of protective clothing by employees only in exceptional circumstances, where both of the following conditions are met:

- protective clothing is not used for product safety purposes, but is instead used to protect the employee from the products handled AND
- it is used only in low-risk or enclosed product areas.

8. Production risk zones: high risk, high care and ambient high care

Our production facility packages both cooked and non-cooked component in the same packaging. What risk zone should we use?

High-risk areas contain only components or foods that have undergone a cook or similar process, typically to achieve a 6-log reduction for Listeria.

Where an area needs to include some components that have not received a full cook as well as fully cooked components this will be classed as high-care. This would include sandwiches, ready meals topped with an uncooked ingredient such as fresh herbs or baked cheesecake topped with an uncooked ingredient such as fresh fruit.

For more information refer to the Interpretation guideline, Appendix 3 of the Standard and the BRCGS guideline Understanding Production Risk Zones.

9. Traded products

Can traded goods still be treated as an exclusion?

Traded goods or traded products are defined as products that would normally fall within the scope of the Standard and are stored at the audited site's facilities, but are not manufactured, processed, reworked, packed or labelled at the site.

If your product fulfils this description traded products can be excluded from the audit scope, in which case the requirements of section 9 will not be applicable. Where excluded, the auditor will record it as an exclusion from scope on the report and the certificate.

Please note that the BRCGS food safety logo cannot be used for promoting traded products even when they form part of the certified scope.

Appendix 2 – Production risk zones

Do the production risk decision trees still exist?

The production risk decision trees still exist and have been updated. They can be found in the BRCGS guideline Understanding Production Risk Zones. This guideline can be found on Participate or purchased on the BRCGS Store.

What production risk zone do we use to reduce the risk of pathogen contamination linked to fruit and vegetables?

The core principle of the Standard is that irrespective of the production risk zone identified, your production facility and processes must be suitable to address the risks specific to the products being manufactured.

The Standard expects sites to fully consider the hazards via risk assessments and ensure suitable controls are in place to mitigate any hazards within the HACCP plan. The Standard does not mandate washing of fruit and vegetables or mandatory consumer labelling, although this may be suitable.

Additional controls may also exist, for example, if hand contact was identified by your site as a potential route of contamination with viruses, you might consider suitable procedures relating to hand hygiene or use of gloves.

For more information please refer to the BRCGS guideline Understanding Production Risk Zones. This guideline can be found on Participate or purchased on the BRCGS Store.

Our products do not fall within the definition given in the Standard of high-risk, high-care or ambient high-care however they still pose a significant risk. Which production risk zone do we use?

A risk assessment may determine that products do not fall within the Standard definition for high-risk, high-care or ambient high-care but still have significant pathogen risks which need to be correctly managed.

Whilst the Standard specifically focuses on the requirements for high-risk, high-care and ambient high-care zones, low-risk does not mean no risk. The site has a responsibility to develop appropriate controls and a factory environment suitable to produce safe food.

I you produce a product that does not fit the typical production risk zone for that type of product, it is recommended that you discuss this with your certification body before the audit starts.

For more information please refer to the BRCGS guideline Understanding Production Risk Zones. This guideline can be found on Participate or purchased on the BRCGS Store.

Appendix 4 - Auditing of activities managed by a head office or central function

Do non-conformities from a head office audit contribute to the final audit score for the whole site?

If the auditor found non-conformities at your head office audit but the site then adequately actioned and then closed out these non-conformities, the findings do not count towards the site's final score. However, where non-conformities were found and not actioned or closed out in time, then they will be included when calculating the final score or grade.

However, it should be noted that audit details of the head office audit will still need to be clear in the audit report.

Please refer to Appendix 4 of the Standard for more information. Certification bodies and BRCGS auditors can also information in document F901 Requirements on How to Complete the Audit Report, found on MyBRCGS.

Appendix 10 - Glossary

How has the definition of outsourced processing changed from Issue 8 to Issue 9?

The BRCGS Technical Working Group agreed that further clarity should be provided on the definition for an outsourced product. The previous definition was:

- Outsourced processing is where an intermediate production process or step in the manufacture of a product completed at another company or site.

The new definition can be found in the Glossary of the Standard:

- Outsourced processing (subcontracted processing): Outsourced processing (also referred to as subcontracted processing) is when intermediate production, processing, storage or a step in the manufacture of a product is completed at another company or site. Outsourced processing is an intermediate step; therefore, during outsourced processing, the product or partly processed product leaves the site being audited for the completion of the outsourced processing before returning to the site. The audited site may or may not complete the additional packing or processing steps of the product.
- Where raw materials receive additional storage or processing prior to their arrival on site, this is not considered to be outsourced processing, but should be managed by the site using supplier approval mechanisms, raw material risk assessments and raw material specifications.

Are promotional stickers included within the definition of primary packaging?

Primary packaging is most often described as the unit of sale to the consumer. If promotional stickers are applied by the manufacturing facility they would fit within the definition of primary packaging and would fall within the scope of the audit. Stickers applied by retailers outside the manufacturing setting would fall outside the scope.

Supporting resources for food safety certification

- Information for certification success
- Useful guidance
- Additional resources to support certification

Global Standard Food Safety (Issue 9)	It is a requirement that all suppliers undergoing a BRCGS audit to the Standard have an official copy of this publication.	BRCGS Store and Participate
Interpretation Guideline	Further explains and discusses the principles behind each of the requirements of the Standard clause by clause.	BRCGS Store and Participate
Guide to Key Changes	Provides full details of all changes to the requirements of the Standard compared against Issue 8.	BRCGS Store and Participate
Frequently Asked Questions	The most frequently asked questions relating to the Standard.	BRCGS website and Participate
Module 10 GlobalG.A.P. Chain of Custody	Applicable to food producers and manufacturers packing fresh produce who wish to make a claim of origination from a GLOBAL G.A.P. Integrated Farm Assurance (IFA) certificated producer or producer group.	BRCGS Store and Participate
Module 11 Meat Supply Chain	Designed to reduce multiple audits by covering additional specific geographical or customer requirements and auditing them at the same time as a Standard audit.	BRCGS Store and Participate
Module 13 Meeting FSMA Requirements for Food	To assist manufacturing organisations in understanding those prescriptive elements within the FSMA Preventive Controls for Human Foods that are not explicitly covered within the Global Standard Food Safety.	BRCGS Store and Participate
Global Standard Food Safety (Issue 9) Position Statements	This document contains all position statements against the Standard since publication.	BRCGS website and Participate
Auditor Checklist and Site Assessment Tool	Checklist for sites to assess themselves against the requirements before audit.	BRCGS website and Participate
Audit Duration Calculator	Useful to calculate how long an audit could take, considering scope, additional modules and additional activity.	BRCGS website and Participate
Understanding Production Risk Zones	Helps sites understand whether the products they produce will require handling in a high-risk, high-care or ambient high-care area, and how the specific clauses for these areas should be interpreted.	BRCGS Store and Participate

Category Guideline: Fresh Produce	Assists packers of fresh produce covered under Category 5 of the Standard which covers fruit, vegetables and nuts.	BRCGS Store and Participate
Category Guideline: Raw Red Meat	Provides assistance to producers of raw red meat covered under Category 1 of the Standard.	BRCGS Store and Participate
Category Guideline: Alcoholic Drinks, Wine	Assists producers of wine under Category 13 of the Standard which covers alcoholic drinks and fermented/brewed products.	BRCGS Store and Participate
Category Guideline: Raw Poultry	Assists producers of poultry under Category 2 of the Standard.	BRCGS Store and Participate
Effective Allergen Management	Provides explanation of the allergen management requirements and aid companies in the development of robust allergen management systems and procedures.	BRCGS Store and Participate
Effective Environmental Monitoring	Assistance on drawing up, implementing and maintaining an environmental monitoring programme.	BRCGS Store and Participate
Guide to Lighting Best Practice	Guidance on lighting for production lines, warehouses and working areas.	BRCGS Store and Participate
Best Practice Guide to Product Safety Culture	Looks at the critical role played by culture in ensuring the effective implementation of product safety management systems, and in helping to prevent safety incidents.	BRCGS Store and Participate
Understanding Product Changeover	Provides good-practice guidance to help manage product changeover effectively. Does not specifically offer guidance on initial line start-up.	BRCGS Store and Participate
Understanding Vulnerability Assessments	Looks at the subject of food fraud and how to spot, avoid and manage the risks of occurrence in production facilities.	BRCGS Store and Participate
Understanding Allergen Management	Advice on managing allergens across the food, packaging and consumer goods supply chain.	BRCGS Store and Participate
Product Safety Rationale	This aims to highlight and summarise, on the audit report, the characteristics of the product and production processes that make the final product microbiologically safe for consumption or its intended use throughout its shelf-life.	Participate
Understanding Air Quality in Food Production	Helps sites to define outside air quality, the supply air category to achieve and identify the right filter choices for each facility.	BRCGS Store and Participate

Understanding Root Cause Analysis	Guidance to help sites carry out effective investigation into the cause of incidents, product recalls and non-conformities.	BRCGS Store and Participate
Ethical Appraisal Tool	A gap analysis on ethical aspects of the business that helps to enhance practices and improve accountability.	BRCGS Store and Participate
Global Standard Food Safety Issue 8: Sites Training Course	Course to gain a full understanding of the general principles of the Standard, and how to comply with the requirements.	BRCGS website
Global Standard Food Safety Issue 9: Conversion for Sites Course	Course providing in-depth understanding of the revisions of the Standard as well as a review of audit protocol.	BRCGS website

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