BRCGS Foodsafety Issue 9

What will change?

BRCGS9.com

Powered by Mérieux NutriSciences

On 1 August 2022, the BRCGS issued the BRCGS Food Safety Issue 9. We would like to summarise the upcoming changes for you in this White Paper. The audits will start on February 1, 2023.

Key issues in the BRCGS Draft Issue 9

Blended Audit

In the audit protocol, the 'Blended' audit is included as a 3rd possibility. This is an audit that can partly be performed remotely. During the remote audit, the main focus is the assessment of documentation (the 'green norm' paragraphs).

Food safety culture

The obligation of senior management to continuously improve the food safety and quality culture is included in the fundamental section under section 1.1. Improving food safety and quality culture has been added to the policy. BRCGS clearly indicates what is expected from the plan to improve food safety and quality culture. We will also have to include this plan in the internal audit planning.

Training and competence

Where before only relevant staff, temporary staff and contractors had to be trained before starting the operations, this now applies to all staff. Registering training needs in a plan now also applies to all personnel. In addition, BRCGS indicates that training is one of the activities that will certainly be included in the plan for improving food safety and quality culture. The VACCP and TACCP team competencies must also include an understanding of the principles of food fraud and food defence.

Validation

In short: all changes must be validated.
There is more attention for validation within the HACCP section. Validation is mandatory before a change is implemented. A checkpoint is also validated, as are the critical limits of a CCP. When new equipment is put into service and during product development, we also see that validation before implementing changes plays an important role.

Verification

Verification no longer takes place only once annually, but once annually at least and immediately in the event of changes or incidents. We see this not only in the VACCP and TACCP analysis, but also in HACCP, environmental research and process specifications.

Authenticity

Where the standard version 8 spoke about food safety control, compliance with legislation and quality, the word authenticity has been added to version 9. In other words, guaranteeing that food or purchased raw materials offered for sale are of the expected background, composition and quality.

The changes between issue 8 and 9 are considerable.

Summary

Food safety culture is made even more important. BRCGS is directive as to the content of the plan to improve the food safety culture. This is also reflected in the evaluation of the objectives (communication to all personnel). The plan is also reflected in the internal audits.

Extra attention has been paid to VACCP and TACCP. Authenticity has been added to many standard paragraphs and this is on a par with food safety, compliance with legislation and quality. In addition, knowledge of the VACCP and TACCP principles is expected of the team members who set up the hazard analyses.

By default, verification of hazard analysis no longer takes place only once annually, but once annually at least and immediately in the event of changes or incidents. We see this not only in the VACCP and TACCP analysis, but also in HACCP, environmental research and process specifications.

Extra attention is being paid to validation and verification within the HACCP section. Validation is mandatory before any change is implemented. A checkpoint is also validated as are as the critical limits of a CCP. Verification does not only take place once a year but also after an incident. Root cause analysis is also becoming increasingly important in the structural solving of deviations.

Purchase of new equipment and product/process development is being expanded.

X-ray has been specifically designated with similar requirements to metal detection.

The requirements for pet food have been extended to animal feed and there is a new section with guidelines for slaughtering and fishing.

Training requirements apply to all personnel (were previously applied only to relevant personnel).

Guidelines have been added for the use of mobile walls in high-care and high-risk areas.

Should a forklift also be used outside, it will be cleaned before entering the production area.

Part 1

The chapter structure as amended in Issue 8 remains in place. Chapters 1 to 7 apply to all organisations. Chapter 8 only applies if a High-Care / High-Risk or Ambient High-Care is required.
Adding trade goods to the scope is possible by adding chapter 9.

The number of fundamentals has not been changed in this draft either. However, some substantive changes have been made to the content of the fundamentals.

Part 2 General

In many places, the word authenticity has been added; integrity has been replaced by authenticity.
This means that where food safety, complying with legislation and quality are concerned, authenticity is now equally as important.
Must has been replaced by shall, making it both clearer and stricter.
Where Issue 8 still spoke of clauses, we now talk about sections.

Part 2 Chapter 1

Food safety culture plays an even more important role and is included in the fundamentals in Chapter 1. From now on, food safety culture is included in the policy. (1.1.1). The obligations related to the plan to improve food safety culture have also been further expanded. The plan will describe the desired behavior that contributes to the desired improvement of the food safety culture. Activities that are to be included in the plan are further elaborated on in 1.1.2. These activities use the following topics:

- clear and open communication on product safety
- training
- feedback from employees
- behavioural changes required to improve product safety processes
- performance measurement in the area of product safety, authenticity, legality and quality-related activities

Also included is the obligation to annually assess and improve the plan.

In the objectives (1.1.3) it has been added that the status of the objectives, which are reported quarterly to senior management, are now communicated to everyone.

The food safety culture plan is also included in the management review (1.1.4).

In addition to the previously mandatory attendance of senior management at opening and closing meetings, the obligation has been added that the most senior manager of the site must be available during the audit to discuss the effective implementation of the food safety and quality culture plan. (1.1.11)

All employees (instead of relevant personnel) have access to the quality system and it must be possible to

request a training needs assessment for activities that maintain product safety, authenticity, legality and quality. (1.2.2)

The indication that, when external expertise is hired, the day-to-day management of food safety remains the responsibility of the company, has been moved from Chapter 2 (HACCP) to 1.2.4. This obligation has therefore been moved to the obligations of the senior management.

Part 2 Chapter 2

The obligations with regard to the floor plan are shown more clearly and refer to the relevant obligations elsewhere in the standard. (2.3.2) The floor plan, as well as an overview of water distribution, are now considered to be information that is necessary in order to properly perform the HACCP hazard analysis.

The flowcharts are verified at least once a year. Here it has been added that this should also be done in the event of a change that may affect food safety control. (2.6.1)

BRCGS indicates in 2.7.4 that control by baseline conditions and control measures other than a CCP must also be validated. (2.7.4)

The obligation to validate a CCP already existed. It has been specifically added that the critical limits of a CCP must also be validated. (2.9)

The verification of records on controlling of a CCP is verified by an authorised person. It has been added that this person must also be competent. (2.10.2)

BRCGS added in 2.12.1 that:

HACCP or food safety plans should be validated before they are implemented or before changes are made that could affect product safety. This is to ensure that the plan actually gets the identified hazards under control.

Chapter 2.14 (Review of the HACCP plan) has been placed under 2.12 (Validation of the HACCP plan) It has been added that verification must be carried out after a significant food safety incident (e.g. a recall).

Part 2 Chapter 3

To the fundamental 3.4 Internal audits, it has been added that the implementation of the food safety and quality management system will also be assessed.

All activities relating to food safety, authenticity, legality and quality will be assessed at least annually. (3.4.1) The following mandatory components of the internal audit plan have been added:

- the food safety and quality culture plan
- the own assessment of the food safety and quality management systems

For the handling of deviations, reference is made to 3.7. (deployment of a root cause analysis and a competent person in the event of an anomaly that affects security, authenticity or legality).

A summary of the results is expected in the management review (1.1.4)

In 3.4.4, some additions have been made with regard to the hygiene round and factory inspections:

- these must also be carried out after changes affecting food safety
- the results are reported to the personnel responsible for the controlled activity or area
- corrective actions and timetables for their implementation must be agreed upon and their completion must be verified.
- a summary of the results is expected in the management review (1.1.4)

When using a supplier audit for supplier approval, the scope of this audit is expanded to include a review of the supplier's food defence and food fraud plan. The objective is to assess that these plans are part of the supplier's management system and that the specified actions have been implemented. (3.5.1.2)

This obligation has also been added when using a questionnaire for approval of a supplier.

When assessing service providers, the product safety consultant has been added to the list of examples. (3.5.3.1)

The following sentence has been added (3.5.3.3):

There is a documented process for the ongoing assessment of service providers' performance based on risk and established performance criteria. The process is fully implemented. The assessment is documented.

In the draft of the BRCGS Issue 9 standard, more explanation is given on the definition of an outsourced process. (3.5.4) It concerns an 'intermediate' process step in which the product returns to its own site. The scope of the supplier audit (upon acceptance of the supplier) has also been expanded to include an assessment of the supplier's food defence and food fraud plan. The objective is to assess that these plans are part of the supplier's management system and that the specified actions have been implemented. (3.5.4.2)

It has also been added that outsourced processes must be part of the food safety plan (3.5.4.3) and that there must be clear specifications for outsourced processes (3.5.4.4).

Using a Root Cause Analysis is made more important by BRCGS in the new standard. The use of an RCA and how to deal with preventive measures will be described in the procedure for corrective measures. (3.7.1)

In the fundamental (3.7) examples have been added of what BRCGS considers when identifying deviations in the food safety and quality system. These are non-conforming products, internal audits, complaints, product recalls, product testing, third-party audits and online reviews. (3.7)

When controlling non-standard products, the control of products that return to the site has been added. (3.8.1)

In the traceability section, the requirement has been added that the traceability system must meet the legal requirements in the country of sale and must be in line with the intended use of the product. (3.9.1) The use of a mass balance is limited to food raw materials and finished products (without the primary packaging). (3.9.3)

Product contamination (where a product is potentially unsafe or illegal) has been added to the examples of incidents where the incident management and continuity management procedure is in place. (3.11.1) This procedure is somewhat broadened to include incident management (instead of only recall and recalls), also when testing this procedure (3.11.3)

Informing the certification body (within 3 days) has been extended with an authenticity or legal incident. This information provision will have to go through the BRCGS directory.

(3.11.4) Also, there are additional requirements for the information that must be provided:

the company provides sufficient information to enable the certification body to assess the possible consequences of the incident for the continued validity of the current certificate. This at least includes corrective measures, a Root Cause Analysis and a preventive action plan.

Part 2 Chapter 4

The security measures have been moved to 4.1 Environmental standards. There are no substantive changes.

Requirements have been added for the members of the food defence team. There must be an understanding of potential food defence risks (including knowledge of the establishment and the principles of food defence). The food defence plan must comply with the legal requirements in the country of sale and must be in line with the intended use of the product. (4.2.2)

In 4.3 (Layout, product flow and separation), an obligation has been included to carry out an assessment of production risk areas with the aid of annex 2. (4.3.1) The obligation to indicate these on the floor plan is also included. (4.3.2) This also applies to low-risk and closed product areas. Because this obligation has been moved from chapter 8 to chapter 4, this obligation now applies to all companies. It has also been stipulated that areas where there is a separation in time in order to be able to carry out different activities, must be indicated on the floor plan.

The obligations that apply to raised walkways now also apply to mezzanine floors. However, it is stated that this only applies if the line below contains an open product.

Requirements have been added when using curtains made of plastic strips. These should be in good condition and sufficiently resistant to vermin. (4.4.11)

When storing water, a food safety risk shall be controlled. (4.5.1)

In the scheme of water distribution, the source of the water has been added. (4.5.2)

The requirements for equipment have been expanded considerably:

When purchasing new equipment, a documented purchase specification must be established. This contains the requirements of the establishment. Think of relevant legislation, requirements for food contact surfaces and intended use of the equipment (including the products to be produced) (4.6.1). It is stated that the supplier will have to provide evidence to demonstrate that the equipment complies.

There will be a documented procedure for commissioning new equipment to ensure food safety during installation. (4.6.2) This procedure shall also include the handling of other procedures such as training, operating instructions, cleaning, environmental monitoring, maintenance and internal audits.

After installation, there will be a fixed release (focussing on hygiene).

There will also be an inspection by an authorised person before use.

Additional requirements are set for equipment that is no longer used (to be stored in such a way that there is no risk to the product). Storage of this equipment in production and storage areas is possible, provided this equipment is kept clean. (4.6.5)

Additional requirements have been set for mobile equipment such as forklift trucks, but also ladders:

- these must not pose a risk to the product in open product areas.
- if this equipment is also used outside, it shall be cleaned and disinfected before entering the production area.
- Charging equipment should not be placed in an area with open product (4.6.7)

This mobile equipment has also been added to the preventive maintenance schedule. (4.7.1)

When controlling chemicals, the separation of chemicals used as raw materials from other chemicals has been named. (4.9.1.1) It has also been stated that a process must be in place to deal with leaks of chemicals and the return of chemicals that are no longer used, as well as the return of empty drums.

When using wood n areas with open products, monitoring may be based on risk instead of continuous. However, the following has been added: Wood used in contact with food must be fit for purpose (i.e. not damaged or

splintered, not decayed, and any wood treatment must be applied only by legislation and must be approved for use with food). (4.9.5.1)

Specific requirements have been added for the testing of X-ray equipment: (4.10.3.5)

- Use of test material that is considered to be a typical contaminant
- Type and diameter are marked on the test material
- The test is performed with separate test materials
- The test shows that both detection and emission are effective
- The test of immediate test materials at normal speed
- Checks for failsafe systems in detection and ejection systems
- The test should happen as close as possible to the least sensitive part of the detector
- Test with the product in a clearly marked test package
- Test at least before starting and after the last product.

Testing of magnets is only required if the magnet is used to control the final product (4.10.4.1) This also applies to optical sorting equipment. (4.10.5.1)

A section has been added for other detection equipment and the removal of foreign bodies. These shall be checked following the supplier's instructions. The checks shall be recorded. (4.10.7.1)

Waste disposal from open product areas shall be managed in such a way that product safety is not compromised. (4.12.3)

When dealing with surplus food (both own brand and branded products for customers), it is added that it must be safe, comply with the law and that traceability is maintained. (4.13.2)

Part 2 Chapter 5

In the section for product development, a procedure for product development, changes to the existing product, packaging and process are required. It is added that the risks of introducing ingredients that affect product claims are also recorded. (5.1.1)

For labelling, a procedure is expected that describes how approval of printing takes place and how this is recorded. (5.2.1)

The team involved in setting up the vulnerability assessment understands the potential food fraud risks. Knowledge of the raw materials used and the principles of a vulnerability assessment are important. (5.4.1)

A review of the vulnerability assessment shall take place annually and: (5.4.3)

- should there be a change in raw material or supplier
- in case of new risks
- after a significant product safety incident (if related to food fraud)

When claims are made about the status of raw materials, a mass balance will be performed. This is not new. However, it has been added that the frequency may depend on another scheme. If this is not prescribed, the existing six months applies. (5.4.5)

The product composition and the process will be validated when making a claim to ensure the claim and compliance with legislation (in the country of sale). (5.4.7)

The sampling plan shall document the process for obtaining the sample, possibly including delivery to the laboratory. (5.6.1)

The following rules have also been added:

- When legal limits apply, they must be understood and appropriate action is taken immediately to avoid exceeding these limits
- Where applicable, the measurement uncertainty of the results of laboratory tests should be taken into account

In the case of an internal laboratory, it is expected that there are operational procedures describing the laboratory activities. Hygiene guidelines concerning clothing, moving materials to and from the laboratory and managing laboratory equipment have been added. If tests are carried out in a production or storage area (e.g. rapid tests), contamination of the product will be prevented. (5.6.5)

A section on animal feed has been added to the chapter on pet food. The requirements for pet food now also apply to the production of animal feed. (5.8)

When using raw materials with medication, Supplier Assessment in accordance with 3.5.1. has been added, as well as specific training in handling these materials and a process for waste disposal of these materials. (5.8.3)

Where Issue 8 talked about receiving live animals, Issue 9 has devoted a larger section to companies that slaughter or fish. (5.9)

The additional requirements are about:

- A risk assessment on prohibited substances (referring back to the hazard analysis of raw materials in 3.5.1.1.
- traceability must be maintained (5.9.3)
- requirements are set for time/temperature paths (5.9.4)

Part 2 Chapter 6

The storage condition (e.g. temperature) is added to the process specifications.

The review of process specifications will be carried out before making any changes that affect food safety. (6.1.1)

An additional section has been added:

If an establishment handles products or materials (e.g. by-products of production processes) that are outside the scope of the audit, these shall be verified to ensure that they do not pose product safety, authenticity or legal risks to products within the scope. (6.1.7)

In the section on labelling verification, the following has been added:

Processes should be in place to verify that label use is consistent with foreseeable uses and to investigate the cause of any inconsistencies. (6.2.1)

In the event of a product change, it has been added that a check on the removal of printed packaging and labels is carried out as well. (6.2.2)

It has been added to the procedure for handling checkweighers that handling removed packaging shall also be included. (6.3.3)

Part 2 Chapter 7

In 7.1, relevant personnel has been replaced by staff.

This means that all personnel must be adequately trained before starting work. (7.1.1) Training plans for all personnel are in place. (7.1.3)

Training for allergen control and labelling is still available for relevant staff.

Several minor changes have been made to the rules regarding personal hygiene:

- Watches and similar portable devices are not allowed. (7.2.1)
- The exception of the smooth wedding ring has become the exception of a smooth ring. (7.2.1)
- The procedure for inquiring about food-borne diseases also applies to visitors. (7.3.1)

Part 2 Chapter 8

In the absence of physical separation between low-care and high-care, procedures will be put in place for changing clothes. (8.1.3)

A section has been added on moveable walls for separation from a high-risk or high-care area:

Should sites contain moveable partitions as part of the design of the high-risk area or high-care area (e.g. to allow for occasional movement of large items or specialist maintenance equipment), procedures should be in place to ensure that

- removable partitions fit tightly
- their use is controlled; moving the partition is only performed by trained and authorised personnel
- there are procedures for cleaning and repair that must be completed before starting production (8.2.3)

In 8.3.3, in addition to moveable equipment, it is also required for battery charging equipment to be visually distinctive and only for use in this area (or specific procedures for allowing in this area).

The guidelines for cleaning the high-care and high-risk areas have been added:

should take into account the different microbiological risks associated with each production risk area. (8.5.1)

It has been added to the requirements for the cleaning materials used, that they must be hygienically designed and suitable for use. When not in use, they must be cleaned and stored to prevent contamination. (8.5.3)

In 8.4.2, a section has been added on the use of a CIP installation in a high-care or high-risk area. This installation is used in the room alone, or measures have been taken to prevent contamination of the high-care or high-risk room. The prevention of recirculation from low-risk to high-care or high-risk areas is given as an example.

Part 2 Chapter 9

A section on the HACCP study has been added to the requirements for commercial products. Commercial products must be included in the HACCP study with attention to at least receipt, storage and dispatch. (9.1.1)

Part 3

In this Issue 9, BRCGS introduces the third audit option.
In addition to unannounced and announced (unannounced once every 3 years), the third option is a blended announced audit (unannounced once every 3 years).
This is in accordance with the BRCGS080: Position Statement and Procedure for Blended Audits - Remote Auditing using ICT that came into effect on

The audit is divided into two parts.

During the remote audit, the focus is on documentation and registrations.

This will be followed by an on-site audit focusing on the production floor.

This second part will make up for at least 50% of the audit time.

Prerequisites are that a risk assessment from the certification body:

- confirms that a robust audit is possible (e.g. availability of remote technology at the site)
- assesses the percentage of the audit that can be performed remotely, up to a maximum of 50% of the audit duration
- at the time of publication is available as an option only for re-certification audit and not for initial audits (i.e. this option is not available for the first BRCGS audit at a site)

www.merieuxnutrisciences.com