

Standard



BRC GLOBAL STANDARD

FOOD

Issue 4

January 2005

Contents

Acknowledgements iii

Introduction 1

Background 1

The BRC Global Standard – Food 2

Legislative Requirements 2

Benefits of the BRC Global Standard – Food 3

Principles of the BRC Global Standard – Food 3

Management of the BRC Global Standards 4

The BRC Standards Governance and Strategy Committee 4

The Standard Technical Advisory Committee 5

The Scope of the BRC Global Standard – Food 5

The Format of the BRC Global Standard – Food 5

The BRC Global Standard – Food and its Relationship with Other Standards 6

Accreditation 6

Certification 6

Ownership and Usage of the BRC Logo 7

Liability 7

1 HACCP System 10

2 Quality Management System 11

2.1 Quality Management System – General Requirements 11

2.2 Quality Policy Statement 11

2.3 Quality Manual 11

2.4 Organisational Structure, Responsibility and Management Authority 12

2.5 Management Commitment 12

2.6 Customer Focus 13

2.7 Management Review 13

2.8 Resource Management 14

2.9 Internal Audit 14

2.10 Purchasing 15

2.10.1 Supplier Approval and Performance Monitoring 15

2.11 General Documentation Requirements 16

2.11.1 Documentation Control 16

2.11.2 Specifications 16

- 2.11.3 Procedures 17
- 2.11.4 Record Keeping 17
- 2.12 Corrective Action 17
- 2.13 Traceability 18
- 2.14 Management of Incidents, Product Withdrawal and Product Recall 18
- 2.15 Complaint Handling 19

3 Factory Environment Standards 20

- 3.1 External Environment Standards 20
 - 3.1.1 Location 20
 - 3.1.2 Perimeter and Grounds 20
- 3.2 Internal Environment Standards 21
 - 3.2.1 Layout, Product Flow and Segregation 21
 - 3.2.2 Fabrication – Raw Material Handling, Preparation, Processing, Packing and Storage Areas 22
 - 3.2.2.1 Walls 22
 - 3.2.2.2 Floors 22
 - 3.2.2.3 Ceilings /Overheads 22
 - 3.2.2.4 Windows 22
 - 3.2.2.5 Doors 23
 - 3.2.2.6 Lighting 23
 - 3.2.2.7 Air Conditioning/Ventilation 23
- 3.3 Services 23
- 3.4 Equipment 24
- 3.5 Maintenance 24
- 3.6 Staff Facilities 25
- 3.7 Physical and Chemical Product Contamination Risk 26
- 3.8 Housekeeping and Hygiene 26
- 3.9 Waste/Waste Disposal 27
- 3.10 Pest Control 28
- 3.11 Transport 29

4. Product Control 30

- 4.1 Product Design/Development 30
- 4.2 Handling Requirements for Specific Materials 30
- 4.3 Metal Detection/Foreign Body Detection 31
- 4.4 Product Packaging 32
- 4.5 Product Inspection and Analysis 32
- 4.6 Stock Rotation 33
- 4.7 Product Release 33
- 4.8 Control of Non-conforming Product 33

5 Process Control 34

- 5.1 Control of Operations 34
- 5.2 Quantity Control 35
- 5.3 Calibration and Control of Measuring and Monitoring Devices 35

6 Personnel 36

- 6.1 Training – Raw Material Handling, Preparation, Processing, Packing and Storage Areas 36
- 6.2 Personal Hygiene – Raw Material Handling, Preparation, Processing, Packing and Storage Areas 37
- 6.3 Medical Screening 38
- 6.4 Protective Clothing – Food Handlers And Others Working In or Visiting Food-handling Areas 38

7 Glossary of Terms 39**8 Evaluation Protocol**

- 8.1 Purpose of the Protocol 43
 - 8.2 Process of Certification 43
 - 8.3 Company/Certification Body Contractual Arrangements 43
 - 8.4 Certification Body Selection 43
 - 8.5 Company/User Contractual Arrangements 44
 - 8.6 Preparation for an Evaluation Visit 44
 - 8.7 Duration of Evaluation Visit 45
 - 8.8 Evaluation Visit Programme 46
 - 8.9 Evaluation – Non-conformities and Corrective Action 46
 - 8.10 Evaluation Reporting and Certification 50
 - 8.11 Evaluation Grading and Evaluation Frequency 52
 - 8.12 Documentation 53
 - 8.13 Supplementary Action 53
 - 8.14 Complaints 54
 - 8.15 Appeals 54
- Appendix 1 Certification Process 55
- Appendix 2 Product Categories 56

Introduction

■ Background

Under the terms of the UK Food Safety Act 1990, retailers, like all sectors involved with the supply of food, have an obligation to take all reasonable precautions and exercise all due diligence in the avoidance of failure, whether in the development, manufacture, distribution, advertising or sale of food products to the consumer.

That obligation in the context of retailer branded products involves a number of activities, one of which is the verification of technical performance at food production sites. For many years, each UK retailer undertook this activity separately, verifying food production site performance against its individual, internally developed standards. In most instances verification was undertaken by the retailer's in-house technologists, and in other instances by third-party inspection bodies.

In 1998 the British Retail Consortium (BRC) developed and introduced the BRC Technical Standard and Protocol for Companies Supplying Retailer Branded Food Products (the BRC Food Technical Standard). Although originally developed primarily for the supply of retailer branded products, in recent years the BRC Food Technical Standard has been widely used across a number of other sectors of the food industry such as food service and ingredients manufacture. There has also been substantive evidence of the use of the BRC Food Technical Standard outside the UK, as it became the framework upon which many companies have based their supplier assessment programmes.

Since the first issue of the BRC Food Technical Standard in 1998 it has been revised on three occasions, with Issue 4 being published in January 2005. On each review and revision, the BRC has consulted extensively with a wide range of stakeholders to ensure acceptability, retain integrity and, more importantly, to promote best practice standards.

In January 2003 the BRC recognised that the name and the scope of the BRC Food Technical Standard required change to reflect the change in its use; it was renamed the BRC Global Standard – Food. The BRC believes that with this change, there is a commitment to continue to work in partnership with other sectors of the food industry to promote best practice and consumer safety.

A number of significant changes to Issue 3 of the BRC Global Standard – Food have taken place as a result of opinions put forward by retailers and stakeholders during the consultation and review process to develop Issue 4. Those familiar with the previous issues of the Standard will note that Issue 4 of the Standard has:

- one status level, removing the status of Foundation or Higher level
- no 'Recommendations on Good Practice' stated and therefore the removal of the need for certification bodies to assess and comment
- a consolidation of requirements and clauses in line with evaluation process
- the inclusion of a grading system which is based upon the number and status of non-conformities established during the evaluation and used to determine evaluation frequency
- the recognition of specific requirements which must be well established, continually monitored and maintained, and are fundamental to ensure the product safety and integrity is in place
- more detailed and concise information on the processes supporting certification in the form of tables and diagrams
- incorporation of an expanded protocol detailing specific requirements.

Although the BRC has provided recommendations on good practice in past issues of the Standard, it is felt that it would be pertinent to develop a series of guidelines that can be product or process specific to complement the Standard. It is also envisaged that international industry specific best practice guidance will be given formal recognition by the BRC.

As with all revisions of the BRC Technical Standards, there is recognition that a transition period must be in place between publication and full implementation. In the case of the BRC Global Standard – Food this will be 1 January 2005 to 30 June 2005, and there will be no recognition of certificates that are issued as a result of evaluations performed against Issue 3 after 30 June 2005. All certification issued against evaluations carried out prior to 1 July 2005 will be valid for the period specified on the certificate.

■ The BRC Global Standard – Food

The Standard was developed to assist retailers in their fulfilment of legal obligations and protection of the consumer, by providing a common basis for the audit of companies supplying retailer branded food products. Since the introduction of the UK Food Safety Act, the obligations placed upon the UK retailer have now become best practice across much of the supply chain and therefore manufacturers have accepted the principles of the Standard as a means of providing critical elements of their due diligence systems.

The BRC Global Standard – Food encompasses the fundamental principles of the retailers' own standards and has been continuously reviewed to reflect the requirements of both retailers and their suppliers. It is not intended to replace the requirement of any legislation where this legislation requires a higher standard for a specific industry sector.

Technical audit of supplying companies' production premises forms only part of the customer's due diligence system, and the acceptance for a company to supply rests with the individual customer.

The Standard will be reviewed on a regular basis by the BRC membership and revised, where considered appropriate.

The Standard requires:

- the adoption and implementation of Hazard Analysis and Critical Control Point (HACCP)
- a documented and effective quality management system
- the control of factory environment standards, products, processes and personnel.

■ Legislative Requirements

The UK is one of the very few countries which has a statutory 'due diligence' defence requirement within its legislative framework. This effectively means that a retailer cannot accept and rely on a 'warranty' defence, if legal proceedings were presented.

The due diligence defence is a general defence of 'all reasonable precautions and all due diligence' against principal offences in the relevant UK statutes and can be defined as 'it shall ... be a defence for the person charged to prove that he took all reasonable precautions and exercised all due diligence to avoid the commission of the offence by himself or by a person under his control'.

The relationship that existed between a Standard user and their suppliers was recognised by those involved with the development of guidance for the provision of a due diligence defence, and the considerable influence of the retailer over product formulation/design, and standards existing within the production environment and control systems were reflected by the content of guidance. The responsibility for the safety and legality of product is shared between the supplier and the retailer, with emphasis for the retailer being placed on five main areas of control, namely:

- 1 To ensure the presence of a detailed specification which is not unlawful or inconsistent with any compositional/safety standards or good manufacturing practice
- 2 To ensure they satisfy themselves that a supplier is competent to produce the specified product, complies with legal requirements and operates appropriate systems of production control
- 3 From time to time make visits, where practical, to verify the competence of the supplier or receive the result of any other audit of the supplier's system for that purpose

- 4 To establish and maintain a risk-assessed programme for product examination, testing or analysis
- 5 To monitor and act upon customer complaints.

The BRC Technical Standards have been developed to ensure that these requirements are met and monitored.

Supplier evaluation against these Standards forms an integral part of a retailer's and Standard user's legal conformance systems and it is therefore essential that suppliers, certification bodies and accreditation bodies are fully aware of their responsibilities and their critical role within this legal framework.

■ Benefits of the BRC Global Standard – Food

There are a number of benefits arising from the use of the Standard:

- A single standard and protocol that allow an evaluation by third-party certification bodies which shall be accredited to an international Standard ISO/IEC Guide 65
- Single verification commissioned by the manufacturer or supplier, in line with an agreed evaluation frequency, will allow both manufacturers and suppliers to report upon their status to food retailers and other organisations as agreed
- The Standard is comprehensive in scope covering areas of quality, hygiene and product safety throughout the food industry
- The Standard addresses part of the 'due diligence' requirements of the food manufacturer/supplier, packer/filler and retailer. Food manufacturers may also use this Standard to ensure their suppliers are following good hygiene practices and complete the 'due diligence' chain
- Within the associated protocol, there is a requirement for ongoing surveillance and confirmation of the follow-up of corrective actions on non-conformance to the Standard thus ensuring that a self-improving quality, hygiene and product safety system is established.

■ Principles of the BRC Global Standard – Food

The objective of the BRC Global Standard – Food is to specify safety, quality and operational criteria required to be in place within a manufacturing organisation to supply food products to UK retailers, their suppliers or Standard users. The format and content of the Standard are designed to allow an assessment of a company's premises and operational systems and procedures by a competent third party against the requirements of the Standard.

The BRC recognises the importance of accreditation and has worked closely with the United Kingdom Accreditation Service (UKAS) during the development of all the Technical Standards to ensure that all the requirements of product certification are met.

Third-party bodies carrying out assessments must gain accreditation to ISO/IEC Guide 65 **and** meet the requirements within the BRC Global Standard – Food and supporting documentation.

Significant efforts have been made to promote openness and transparency in the development and implementation process and to work closely with all stakeholders to ensure the integrity and robustness of the system.

The principles of the BRC Global Standard – Food are:

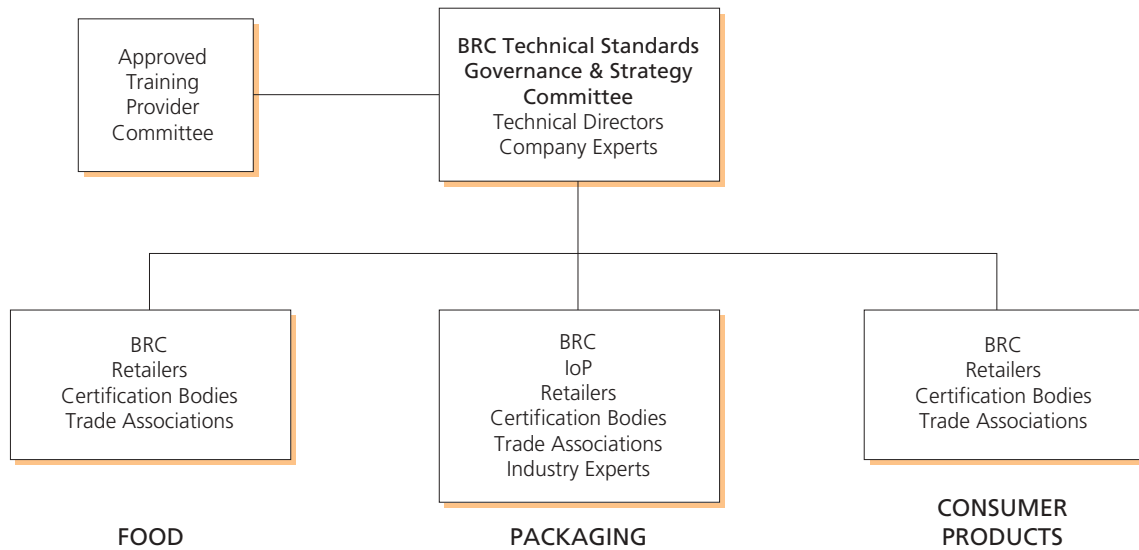
- to minimise duplication of evaluation
- to work in collaboration with accreditation bodies to ensure that the accreditation process delivers effective control and maintenance of the standards of evaluation
- to encourage 'local' evaluation
- to ensure openness, transparency and compliance with fair trading legislation
- to promote direct stakeholder participation during development and maintenance as part of technical advisory committees

- to continuously review and improve standards and supporting processes
- to promote 'best practice'.

■ Management of the BRC Global Standards

The BRC has brought together a number of interested parties and stakeholders within a formal committee framework to provide strategic direction and effective management of the BRC Technical Standards (see Figure 1).

Figure 1 – BRC Technical Committee Structure



■ The BRC Standards Governance and Strategy Committee

Members are:

BRC members (Technical Directors or nominated Company Experts)

BRC management (Director of BRC Trading, Director of Food Policy and Head of Technical Services).

The functions of the Committee are:

- the approval of policies relating to the operation of activities with respect to BRC Standards
- to maintain an overview of policy implementation
- to oversee the performance of BRC Technical Standards Committees
- to handle appeals, disputes or grievances relating to BRC Technical Standards
- to receive reports on the activities of the Approved Trainer Provider Committee
- to establish working groups where appropriate to resolve issues.

■ The Standard Technical Advisory Committee

Members are:

BRC members

BRC

Trade associations' representatives

Certification body representatives

UKAS representative (in attendance).

The functions of the Committee are:

- to act upon policy specified by the BRC Technical Standards Governance and Strategy Committee
- to review operational issues with respect to Standards
- to resolve any issues with respect to content or operation of Standards and communicate with relevant parties
- to put forward recommendations to the BRC Technical Standards Governance and Strategy Committee.

The BRC will put into place performance measurement systems to monitor continued compliance by companies, certification bodies and accreditation bodies.

■ The Scope of the BRC Global Standard – Food

The BRC Global Standard – Food sets out the requirements for the manufacture of processed foods and the preparation of primary products supplied as retailer branded products, branded food products and food or ingredients for use by food service companies, catering companies and food manufacturers. Certification will apply to products that have been manufactured or prepared at the site where the evaluation has taken place and will include storage facilities that are under the direct control of the production site management.

Companies whose **primary operation** is the processing of product or the supply of pre-packed product may be included in the scope of certification, **if appropriate controls** are in place and the scope **specifically excludes** the processing or preparation of pre-packed product.

The Standard shall not apply to activities relating to:

- wholesale
- importation
- distribution or storage (outside the direct control of the company).

■ The Format of the BRC Global Standard – Food



Each section of the Technical Standard begins with a highlighted paragraph in bold text, which is the statement of intent, that all companies must comply with in order to gain certification.

Below this statement of intent, there are specific requirements relating to the statement of intent.

Product certification is dependent upon continued compliance and within the Standard certain requirements have been designated as fundamental requirements, which will be marked with the word 'Fundamental' immediately after the section heading. These fundamental requirements relate to systems, which shall be well established, continuously maintained and monitored by the company. Where a critical or major non-conformity is raised against the statement of intent associated with these requirements, this shall result in non-certification, suspension or withdrawal of certification. In all cases where critical or major non-conformity is raised against fundamental requirements, this will lead to further full evaluation to establish demonstrable evidence of compliance.

The requirements deemed as being fundamental are:

- HACCP System, Section 1
- Quality Management System, Section 2.1
- Internal Audit, Section 2.9
- Corrective Action, Section 2.12
- Traceability, Section 2.13
- Layout, Product Flow and Segregation, Section 3.2.1
- Housekeeping and Hygiene, Section 3.8
- Handling Requirements for Specific Materials, Section 4.2
- Control of Operations, Section 5.1
- Training, Section 6.1.

The evaluation protocol provides the specific requirements for those organisations involved with evaluation against the BRC Global Standard – Food.

■ The BRC Global Standard – Food and its Relationship with Other Standards

The BRC Global Standard – Food will be used by certification bodies as a Standard in its own right, without addition or amendment to format or content.

It may only be incorporated into a certification body's own standards with the written consent of the British Retail Consortium.

■ Accreditation

Accreditation provides assurance that accredited certification bodies are competent to carry out the work they undertake, therefore minimising business risk.

Accreditation is the key to ensure that consumers, suppliers and purchasers can have confidence in the quality and safety of the product.

Accreditation by the national accreditation body means that evaluators have been assessed against internationally recognised standards to demonstrate their competence, impartiality and performance capability. It provides benefits of the avoidance of cost and time involved with the reassessment of product testing and, as the national accreditation body is independent, it will help demonstrate due diligence in the event of legal challenge.

With regard to the competence of the evaluators employed by certification bodies, this is defined in supporting documentation issued to them. There are defined fields of evaluation (product categories), which can be assessed by individual evaluators. It is the responsibility of the certification body to appoint the appropriate evaluator to perform an evaluation.

Confirmation of the scope of accreditation for individual certification bodies shall be provided within accreditation schedules; these schedules are published by the national accreditation body.

■ Certification

Accredited certification bodies evaluate companies to confirm conformity of product with the specified requirements laid down within the BRC Technical Standards.

Evaluation by the certification bodies will be carried out at a specified frequency to demonstrate the continued conformity of the certified product with the required Standard.

Only those certification bodies who have accreditation to ISO/IEC Guide 65 with a scope, which includes meeting the requirements of the Standard (or actively seeking accreditation to ISO/IEC Guide 65), shall carry out evaluations against a BRC Standard and issue appropriate certificates.

These organisations shall comply with the requirements of the United Kingdom Accreditation Service (UKAS) regulations and guidance published by the European co-operation for Accreditation (EA) or the International Accreditation Forum (IAF).

The BRC recognises that to achieve accreditation certification bodies must be able to demonstrate their competence to carry out evaluations against the BRC Standards. Therefore, a certification body shall be allowed to carry out evaluations prior to achieving accreditation status where they can demonstrate all the following:

- an active application for ISO/IEC Guide 65 accreditation
- that accreditation will be achieved within 12 months of the date of application and individual personnel experience and qualification in the field of evaluation will be consistent with the standards laid down within supporting documentation.

These organisations will also comply with the requirements of the BRC specified within the document, 'Requirements for Organisations Offering Certification Against the Criteria of the British Retail Consortium Technical Standards'. This document is available on the BRC website (www.brcglobalstandards.com).

The BRC has developed an open scheme for those certification bodies wishing to work with BRC Standards and has worked closely with national accreditation bodies and individual certification bodies to ensure full compliance with requirements and consistency of activity (see Figure 3).

Certification bodies registered with the BRC are listed on the BRC website (www.brcglobalstandards.com) and their status, i.e. recognised or seeking recognition, relates to the progress made to demonstrate full compliance with requirements.

The relationship between accreditation and certification is summarised in Figure 2, but the reader must be aware that certification bodies are **accredited** and companies are **certificated**.

■ Ownership and Usage of the BRC Logo

The BRC logo is copyright material and a registered trademark, owned by the British Retail Consortium. The usage of the BRC logo is regulated and governed by the British Retail Consortium and use of this logo is only permissible with the formal agreement of the British Retail Consortium.

■ Liability

Whilst the BRC has endeavoured to ensure that the information in this publication is accurate, the BRC shall not be liable for any damages (including without limitation damages for loss of business or loss of profits) arising in contract, tort or otherwise, from this publication or any information contained in it, or from any action or decision taken as a result of reading this publication or any such information.

how to order this BRC Standard

BRITISH **RETAIL** CONSORTIUM



ONLINE

Visit www.brc.org.uk/standards/ordering.htm and click on the relevant shopping cart image

TELEPHONE

Please call
+44 (0) 870 243 0123

Textphone
+44 (0) 870 240 3701

TSO SHOPS

View a copy at your local TSO shop

For further information about our full range of BRC Global Standards, please visit:
<http://www.brcglobalstandards.com>