Global Standard Food Safety, Issue 8
F837: Position Statements for Issue 8

Document Scope: Where clarification of interpretation of a requirement of the Global Standard Food Safety, Issue 8 or its protocol is necessary this will be published on the BRCGS website (www.brcgs.com) as a Position Statement. Such statements are mandatory in their use from the date specified for implementation or the date of publication on the BRCGS website, where no date is specified.

Change log:

Version no.	Date	Description
1	29/05/2019	First issue of a position statement on clause 1.1.2 and changing certification body for a re-audit.
2	03/09/2019	Addition of Position Statement 3 – Cooked Crustacea
3	17/03/2020	Addition of Position Statement 4 – Environmental monitoring
4	31/03/2021	Addition of Position Statements 5 & 6 – Requirements for home laundry and animal primary conversion

Contents

1 Clause 1.1.2

The following position statement has been agreed to ensure expectations relating to compliance with clause 1.1.2; its consistent application at certificated sites, and assessment during audits are understood.

The clause is applicable to all sites certificated to Issue 8 of the Standard and shall be audited as part of all audits of the Standard.

In summary, the clause requires sites to:
Define and maintain a clear plan for the development and continuing improvement of food safety culture. This plan must include:

- Clearly defined activities that will be completed
- Involve all sections of the site that have an impact of product safety (whilst specific activities may be relevant to certain departments or roles, overall the plan must ensure that all relevant section/roles are covered)
- An action plan indicating how the identified activities will be undertaken/completed
- Measurement of the activities (i.e. were they completed, were the correct people involved, were activities successful, any other learnings)
- Intended timescales for the completion of the activities
- A review of the effectiveness of completed activities

Where sites are non-compliant, the non-conformities shall be graded as follows:

Major Non-conformity

Where the site does not have a documented plan for food safety and quality culture; in this context a plan is more than a short statement of intent, but documentation incorporating the requirements of the clause (as summarised above).

Minor Non-conformity

Where a documented plan exists, but is:

- of poor quality (e.g. insufficiently detailed, for example missing timescales for completion or absence of clear action plans)
- does not cover all the relevant areas or staff
- not fully implemented (e.g. some activities not implemented or not completed to predefined schedule).

Site review of the effectiveness of completed activities

The third bullet point in the clause requires sites to undertake a review of the effectiveness of completed activities.

However, as audits to the Standard only commenced in February 2019 it is possible that this review of the success of the programme, would not always be implemented in year 1 and therefore non-compliance with this bullet point is not considered a non-conformity until the site's second audit to Issue 8.

Corrective action required to enable certification

Corrective action, root cause analysis and preventive action plans shall be developed in accordance with the section 2.3 of the audit protocol.

Grading: The non-conformance shall be included in the calculation of the site grade.

Effective date: 1 June 2019

2 Changing Certification Body for a Re-audit

A re-audit in the context of this requirement is an audit carried out before the usual audit due date or the audit following a failure to be certificated. This most often occurs to improve the audit grade.

Sites have the ability to request a re-audit however this must be completed by the Certification Body who issued the current certificate.

In exceptional circumstances, a site may be permitted to change Certification Bodies for the re-audit when agreed in advance by BRCGS. Where a change in Certification Body has not been sanctioned, the re-audit will be null and void and will not be accepted onto the BRCGS Directory.

Justification shall be provided in writing to the Certification Body who shall submit it to BRCGS for consideration through the formal concession process.

Effective date: 1June 2019

3 High Risk and High Care Production Zones for Cooked Crustacea

This Position Statement summarises BRCGS expectations in terms of production risk zones for cooked crustacea i.e. where the crustacea is cooked as part of the production process or where it was cooked at an earlier step in the production process including at another site.

According to the definitions in appendix 2 of the Standard, these products fit into the definition of high risk:

- Finished product is chilled or frozen to preserve food safety
- All components have received a full cook (equivalent to a 6 log reduction in Listeria monocytogenes)
- Finished product is vulnerable to growth of pathogens or survival of pathogens that could subsequently grow during normal storage and use
- Finished product is ready to eat or ready to heat or, on the basis of known consumer use, are likely to be eaten without adequate cooking.

Although the Standard recognises that some food products can be effectively managed using consumer cooking instructions. Consumer cooking instructions are not considered a valid justification for the production zone for cooked crustacea, as known consumer use, in many countries, is to eat the product cold without any heating and certainly without a full cook. Furthermore, the product appearance could lead consumers to believe the product is already fully cooked, and that no additional cooking is required.

Where a site is currently producing fully cooked crustaceans in a high care area, this will continue to be permitted, providing the key product safety controls relating to segregation and prevention of pathogen contamination of the cooked products are rigorously implemented and validated. Clause 8.1.3 states that where full physical barriers are not in place in the high care area, the site shall have undertaken a documented risk assessment and have introduced effective, validated processes shall be in place to protect products from contamination and this validation and implementation will be assessed as part of the audit.

From Issue 9 of the Standard onwards, all fully cooked crustaceans will be considered high risk (and will therefore need to meet the relevant high-risk requirements of the Standard). Where a site is partially heating a crustacean (i.e. less than log 6 reduction in Listeria monocytogenes) then a high care area will remain appropriate.

Statement publication date: 3 September 2019

4 Environmental Monitoring (Section 4.11.8)

This Position Statement summarises BRCGS expectations in terms of environmental monitoring and compliance with section 4.11.8 of the Food Safety Standard Issue 8:

It should be noted that this section of the Standard (section 4.11.8) relates to microbiological contaminants such as pathogens and spoilage organisms.

Environmental monitoring is an important tool in ensuring the production of safe food and preventing microbiological contamination. As a technique it adds value in mitigating risks from both pathogens and spoilage organisms in the majority of food manufacturing operations.

There are however, a small number of products which are inherently safe from these contaminants (e.g. due to the intrinsic properties of the product which do not support the growth or survival of pathogens or spoilage organisms) and where there is no opportunity for spoilage/pathogen contamination, and therefore an environmental monitoring programme is not required.

The BRCGS Technical Advisory Committee are keen that where sites believe that environmental monitoring is not required, this has a strong foundation in science and is not used as a work around. Therefore:

- It is expected that all sites with high risk, high care or ambient high care operations have an environmental monitoring programme within the relevant open product areas.
- It is generally expected environmental monitoring will be applicable to all other products as there have also been a number of very high-profile food poisoning outbreaks associated with products not conventionally considered as high risk/high care, for example, cantaloupe melons, peanut butter, chocolate and milk powder where environmental monitoring may have been effective in identifying an issue early. Similarly, shelf-life issues such as mould contamination of bakery products may be reduced by suitable monitoring.
- Where a site believes environmental monitoring is not required due to the absence of risk from pathogens and spoilage organisms, the site must prove this absence of risk. As a minimum the site will have a robust risk assessment which considers:

    - both spoilage organisms and pathogens
    - the complete product range at the site

Examples of products where risk assessment may establish that environmental monitoring is not required include:

- Alcoholic beverages and vinegars with a sufficiently high level of alcohol or acid to prevent survival and growth
- Salt and sugar in their dry ‘pure’ form
- Edible oils with no added ingredients
- Fully enclosed production. For example, at a specialist HPP (high pressure processing) facility, where product is received packed, is processed in its packaging and leaves the site in the same packaging.
- Whole vegetables, sold unwashed

Auditors are required to challenge the basis of any risk assessment to make sure this has properly considered likely issues and is demonstrably based on robust science.

Statement Publication Date: March 2020

5 Clarification and calibration on clause 7.4.3 (Home Laundry)

Clause 7.4.3 states:

7.4.3	Laundering of protective clothing shall take place by an approved contracted or in-house laundry using defined criteria to validate the effectiveness of the laundering process. The laundry must operate procedures which ensure: • adequate segregation between dirty and cleaned clothes • effective cleaning of the protective clothing • cleaned clothes are supplied protected from contamination until use (e.g. by the use of covers or bags). Washing of protective clothing by the employee is exceptional but shall be acceptable where the protective clothing is to protect the employee from the products handled and the clothing is worn in enclosed product or low-risk areas only.

With specific regard to the last sentence which is applicable to the use of home laundry facilities:

Where the risk exists of contamination from employee clothing onto, or into the product, home laundry is not acceptable.

For home laundering to be permitted, both of the following conditions must be met:

1. It is only applicable to protective clothing for employees working in low risk or enclosed product areas (and non-product areas).
   AND
2. The protective clothing is used for employee benefit, and NOT part of the product protection system.

Statement Publication Date: March 2021

6 Requirements for Animal Primary Conversion

Issue 8 of the Global Standard Food Safety has been benchmarked to the GFSI Benchmark since its publication in 2018. However, subsequent to the benchmarking, GFSI have published several updates, and the current version is Benchmark 2020.

For the Standard to maintain its benchmarked status, it is important that the Standard completely meets the GFSI benchmark document, and it is therefore necessary to explain several requirements (all shown below) and how they impact sites involved in Animal Primary Conversion, to ensure certificated sites complete all the activities required.

For the purposes of this Position Statement animal primary conversion is defined as sites that complete the slaughter and/or evisceration of animals (including red meat, poultry and game) or the slaughter and/or gutting of fish. Applicable sites will therefore fall within BRCGS product categories 1, 2 or 4.

Prohibited Substances

CLAUSE	REQUIREMENTS
3.5.1.1	The company shall undertake a documented risk assessment of each raw material or group of raw materials including primary packaging to identify potential risks to product safety, legality and quality. This shall take into account the potential for: • allergen contamination • foreign-body risks • microbiological contamination • chemical contamination • variety or species cross-contamination • substitution or fraud (see clause 5.4.2) • any risks associated with raw materials which are subject to legislative control. Consideration shall also be given to the significance of a raw material to the quality of the final product. The risk assessment shall form the basis for the raw material acceptance and testing procedure and for the processes adopted for supplier approval and monitoring. The risk assessment for a raw material shall be updated: • when there is a change in a raw material, the processing of a raw material, or the supplier of a raw material • if a new risk emerges • following a product recall or withdrawal, where a specific raw material has been implicated • at least every 3 years.

Additional interpretation of the clause: Clause 3.5.1.1 of the Standard (shown above) requires a documented risk assessment. This requirement specifically includes any risks associated with chemical contamination and raw materials which are subject to legislative control. Therefore, this risk assessment must consider any risks associated with the purchase of raw materials containing prohibited substances, for example, pharmaceuticals, veterinary medicines (such as growth hormones that are prohibited in the EU), heavy metals and pesticides.

Traceability of Edible Portions of the Carcass

FUNDAMENTAL The site shall be able to trace all raw material product lots (including primary packaging) from its suppliers through all stages of processing and dispatch to its customers and vice versa.

Additional interpretation of the Statement of Intent: The Statement of Intent for section 3.9 (shown above) requires an effective traceability system for all raw materials. This is further explained within the clauses in section 3.9 including the need for a documented traceability procedure (clause 3.9.1) and identification of raw materials, intermediate/semi-processed products, part-used materials, finish products and materials pending investigation (clause 3.9.2).
Therefore, the site must operate appropriate procedures to ensure the traceability of all edible parts of the carcass is maintained, until the carcass is deemed fit for human consumption, including blood for human consumption.

Post-Slaughter Times and Temperatures for Chilling and Freezing

CLAUSE	REQUIREMENTS
6.1.1	Documented process specifications and work instructions/procedures shall be available for the key processes in the production of products to ensure product safety, legality and quality. The specifications/procedures as appropriate shall include: • recipes – including identification of any allergens • mixing instructions, speed, time • equipment process settings • cooking times and temperatures • cooling times and temperatures • labelling instructions • coding and shelf-life marking • any additional critical control points identified in the HACCP or food safety plan. Process specifications shall be in accordance with the agreed finished product specification.

Additional interpretation of the clause: Clause 6.1.1 of the Standard (shown above) requires documented process specifications and work instructions for all key processes to ensure product safety, legality and quality. This requirement specifically includes cooling times and temperatures. Therefore, sites must have defined post-slaughter time and temperature requirements for all chilled and frozen meat products.

Effective Date: 1 May 2021