

BRCGS Standard for Agents and Brokers Position Statements for Issue 2

Document Scope:

During the lifetime of a published Standard the BRCGS Technical committee may be asked to either review the wording of a clause in the Standard, provide an interpretation for a requirement or rule on the grading of non-conformity against a clause. Any such judgements are defined in position statements. Position statements are binding on the way that the audit and certification process shall be carried out and are an extension to the Standard. This document contains a summary of the position statements for the BRCGS Standard for Agents and Brokers Issue 2.

Change log:

Version no.	Date	Description
1	June 2018	Position statement to allow limited exclusions from scope for audits against Issue 2 of the Global Standard for Agents & Brokers
2	September 2018	Position statement to allow accommodate the requirements of GFSI Benchmark 7.2 into A&B Issue 2.
3	12/08/2019	New BRCGS logo and footer changed

1. Exclusions from scope

Issue 2 of the Global Standard for Agents & Brokers states (Protocol section 1.6.2):

'The fulfilment of the certification criteria relies on clear commitment from the company management to adopt the best-practice principles outlined within the Standard and to develop a product safety culture within the business. There is often an assumption by customers that where a certificate has been issued to a company's office, all products and not just a selection of products have been include within the scope of the certificate. It follows, therefore, that the exclusion of products or services provided by a certificated office shall not be permitted.

Certificates are issued to the company for specific office locations. It is permissible for a company to have some offices certificated under the scheme and other offices not included in the scheme.'

However, this has created an unexpected challenge for sites and certification bodies as Issue 2 expanded the scope of the Standard to include food, packaging and consumer products, which means that where a site's product range includes all of these product types, the certification bodies are responsible for identifying and training an auditor (or auditors) with experience of all three of these product types (Issue 2 Appendix 4). This has two consequences:

- Certification bodies have to send multiple auditors to relatively small companies (eg one auditor approved for food safety, another for packaging materials and a third for consumer products)
- Certification bodies having to delay or postpone audits due to a limited number of auditors approved for the completion of consumer products audits

In order, to prevent these challenges BRCGS will permit a site to exclude a type of product (eg consumer products). It is only permitted to exclude the entire type of product, it is not acceptable to include some food products in scope and exclude other food products, or to include some consumer products and exclude other consumer products. For example, the site must either have a scope which includes all food products and all consumer products, or one that includes all food products and excludes all consumer products, or one that excludes all food products and includes all consumer products.

The scope must include the entire type of product (e.g. all food products), and therefore it is not permitted to include chilled and frozen foods but exclude ambient foods.

The audit report and certificate shall accurately reflect any exclusions from scope. On the certificate, certification bodies shall add additional text under product categories e.g.:

For the scope: Broker for dried fruit and prepared fresh fruit

Product categories: Chilled and frozen food
Ambient food

Exclusions from scope: Broker for paper and textile products

A new audit report template is available on the BRCGS Directory which includes exclusions from scope. The report template should be used for all audits from 1st August 2018 onwards.

Issued 13/06/2018

2. GFSI Benchmarking Requirements Version 7.2

Issue 2 of the Global Standard for Agents and Brokers has been benchmarked to the GFSI Benchmark Version 7.1 since April 2018. However, subsequent to the application for benchmarking GFSI published an updated version of the benchmarking requirements (version 7.2).

For the Standard to maintain its benchmarked status, it is important that the Standard completely meets the GFSI document and it is therefore necessary to amend one of the requirements (shown below) to ensure certificated sites complete all the activities required by the new GFSI benchmark.

These changes will be included in all audits from 1st February 2019 onwards.

AMENDED REQUIREMENT

Existing clause 4.1.2 states:

4.1 Approval and performance monitoring of manufacturers/packers of traded products

Clause	Requirements
4.1.2	<p>The process for the initial and ongoing approval of manufacturers of products shall be based on risk. It shall include one or a combination of the following:</p> <ul style="list-style-type: none"> Valid certification of the manufacturing or packing site to the applicable BRC Global Standards or a standard benchmarked by the Global Food Safety Initiative (GFSI). The scope of the certification shall include the products traded by the agent or broker. A supplier audit with a scope to include product safety, traceability testing, HACCP or hazard and risk management review, and good

manufacturing practices. This shall be undertaken by an experienced and demonstrably competent product safety auditor.

For products (food or non-food) assessed as low-risk only, and where a valid risk-based justification is provided, initial and ongoing approval may be based on a completed manufacturing site questionnaire that has been reviewed and verified by a demonstrably competent person.

For non-food products assessed as low-risk only, and where a valid risk-based justification is provided, initial and ongoing approval may also be based on at least one of the following:

- a legally enforceable contract/specification from the supplier
- a historical trading relationship, supported by documented evidence of performance reviews that demonstrate satisfactory performance.

This clause may not be applicable where it is a customer requirement that products are supplied by a specific manufacturer and the liability is with that customer. A record of the customer's requirement for the use of a specific supplier shall be maintained.

For all audits from 1st February 2019 this requirement will be replaced by:

4.1 Approval and performance monitoring of manufacturers/packers of traded products

Clause	Requirements
4.1.2	<p>The process for the initial and ongoing approval of manufacturers of products shall be based on risk. It shall include one or a combination of the following:</p> <ul style="list-style-type: none"> • Valid certification of the manufacturing or packing site to the applicable BRC Global Standards or a standard benchmarked by the Global Food Safety Initiative (GFSI). The scope of the certification shall include the products traded by the agent or broker. • A supplier audit with a scope to include product safety, traceability testing, HACCP or hazard and risk management review, the product security (food defence) plan, the product authenticity plan and good manufacturing practices. This shall be undertaken by an experienced and demonstrably competent product safety auditor. <p>For products (food or non-food) assessed as low-risk only, and where a valid risk-based justification is provided, initial and ongoing approval may be based on a completed manufacturing site questionnaire. As a minimum the questionnaire must demonstrate that the supplier has effective action plans to control product safety, product security (food defence) and product authenticity. The questionnaire shall be that has been reviewed and verified by a demonstrably competent person.</p>

For non-food products assessed as low-risk only, and where a valid risk-based justification is provided, initial and ongoing approval may also be based on at least one of the following:

- a legally enforceable contract/specification from the supplier
- a historical trading relationship, supported by documented evidence of performance reviews that demonstrate satisfactory performance.

This clause may not be applicable where it is a customer requirement that products are supplied by a specific manufacturer and the liability is with that customer. A record of the customer's requirement for the use of a specific supplier shall be maintained.

Interpretation

In addition to the guidance provided in the Interpretation Guideline for clauses 4.1.2 and 4.8.2 which remain relevant to the amended clause, the following should be considered:

Each supplier must undertake risk assessments of the potential risks to the products and have appropriate controls in place to mitigate identified risks. This includes during manufacture, processing, packing and where part of the process, storage and transport. The management of these risks is already assessed by the agent or broker during the supplier approval process (for example, by confirmation of certification status, by auditing the supplier or by obtaining sufficient information in a supplier questionnaire). In addition to product safety, traceability, HACCP (or hazard and risk management) and good manufacturing practices (which have always been part of the clause), the amended clause now identifies two additional risks that must be considered:

- product security (food defence) – often referred to as a threat assessment
- product authenticity (food fraud) – often referred to as a vulnerability assessment

The output from the supplier's assessments will be a documented threat assessment plan and a documented fraud mitigation plan (a combined plan is acceptable providing it appropriately assesses all of the relevant risks).

Where products are identified as being at particular risk, the plan must also include details of controls implemented by the supplier to mitigate the identified risks.

Where a supplier is certificated to a BRCGS Standard or a GFSI benchmarked standard, they will already be required to have these assessments in place by that standard (for example, sections 4.2 and 5.4 of the BRCGS Standard for Food Safety), and therefore no additional action is required by the agent or broker as the certificated supplier's

threat assessment and fraud mitigation plans are audited as part of the certification audit. However, where the supplier is not certificated, the agent or broker will need to obtain sufficient information to ensure these activities are in place, and therefore the supplier approval, audit scope and/or questionnaire will need to include this.

Issued 25/09/2018