THE DIFFERENCES BETWEEN ISSUES 2 AND 3 STORAGE AND DISTRIBUTION

The consultation and review of emerging food safety concerns since the development of Issue 3 identified a number of opportunities for further improvement. The key objectives identified for the working groups were to:

- provide greater focus on security in terms of product, load and vehicles
- introduce a grading system to provide a true reflection of the standards at the sites and to offer more opportunities for
  the best sites to differentiate themselves
- include requirements to encourage wholesalers to reduce their exposure to food fraud
- ensurethattherequirementsandauditprocessarefocusedonreducingtheissuesmostfrequentlycausingrecall sandwithdrawals
- introduce a voluntary unannounced audit scheme to instil greater customer confidence
- provide consistency with the other Standards in the BRCGS suite.

The detail of the Standard was developed using two multi-stakeholder working groups: one in North America and one in Europe. Each group was made up of representatives from retailers, food services, certification bodies, logistics companies, trade associations, food manufacturers and, in Europe, the accreditation body, UKAS.

More than 680 people from around the world downloaded the draft document. All of the comments on the draft were reviewed before the final version was produced. The BRCGS would like to thank all of those people who have contributed to the development of Issue 3 of the Standard.

KEY CHANGES TO THE REQUIREMENTS FOR ISSUE 3

STABILITY
Issue 3 of the Standard was well received and we recognise that the Standard is used as the basis for the quality management systems that have been established by many thousands of sites around the world. We also acknowledge that it is a growing Standard, with a number of new facilities entering the programme. In reviewing and rewriting the Standard, we have tried to concentrate on an evolution of the requirements rather than major changes, and we have looked at where the Standard needed to be revised to reflect the changing landscape of the logistics industry. The vast majority of the requirements were unchanged or had slight edits to the wording to aid clarity. This should mean that, for most sites, the focus for getting ready for Issue 3 will be concentrated on a few key areas.

CONSISTENCY WITH OTHER STANDARDS
In clause 1.1.7, for example, we have now brought in an acknowledgment of the use of electronic versions of the Standard as well as the possibility of a subscription to the BRCGS Participate platform. In addition, there is now a requirement to ensure that your certification audit occurs on or before the scheduled due date so that previous non-conformities do not recur.

SECURITY
One area that the working group felt needed some expansion was around security assessments. To this end we have now formalised the requirements for site security risk assessments as well the inclusion of a new clause for a security risk assessment for products while they are in transit (clause 5.2.1). Other clauses within the Standard also re-iterate the need to consider the security of the product before release and acceptance (clauses 5.2.5 and 7.1.3).

MANAGEMENT OF SURPLUS FOOD PRODUCTS
The practice of providing surplus products to charities has become more common and is to be encouraged. Issue 3 has two new clauses (clauses 6.5.5 and 6.5.6) designed to ensure that the product is safe and labelled appropriately and that products donated bearing the customers' brand are treated in accordance with the brand owner's policies.

WHOLESALE OF OWN-LABEL PRODUCTS

This has been one of biggest areas of change within the Standard. More robust measures are needed to provide the highest level of confidence possible to customers in terms of supplier approval and for wholesalers to reduce their exposure to fraud. In addition to the sections below there are also new clauses concerning traceability and product recall/withdrawal.

SUPPLIER APPROVAL

A new clause has been introduced which ensures that wholesalers conduct more background checks on their suppliers as well as more prescription on what is expected as part of the supplier approval process (clause 10.1.1).

REDUCING THE EXPOSURE TO FRAUD

There have been several very high-profile food frauds or adulterations that have included companies within the logistics industry.

Whilst the Standard is not designed to detect product fraud, it should provide confidence to customers that their suppliers have robust systems in place to protect themselves from being the victims of a fraud further back in the supply chain. We have increased the focus on fraud prevention by introducing two new clauses (clauses 10.2.1 and 10.2.2). These look at vulnerability to fraud, as well as introducing tighter controls on supplier approval.

CONTRACT PACKING – PRODUCT LABELLING AND PACKING CONTROL

An analysis of product recall and product withdrawal data shows that the underlying cause of the greatest number of problems is labelling. Problems occur either because the label information is incorrect as a result of changes to products or suppliers,
or because of errors made during the packing process. To attempt to focus on the issue, clauses relating to labelling and packing have been expanded (clauses 13.3–13.6).

CHANGES TO THE AUDIT PROTOCOL

There have been a few changes to the way in which the Standard is audited and certificated from Issue 2 and full details can be found within Part III of the Standard. The main changes and reasons for the changes are summarised below:

- EXCLUSIONS FROM SCOPE In Issue 2 there were no rules around the exclusions from scope which led to customers being unsure about what was covered in the audit. Changes have been brought in that mirror the other Standards. It is
  now much clearer about what we expect to be included within the scope of the audit as well as what can now be excluded.

- GRADING We have now introduced a letter grading system to provide a true reflection of the standards at the sites as well as more opportunities for the best sites to differentiate themselves. It is also the same as other Standards which helps with
  consistency for auditors and certification bodies.

- AUDIT FREQUENCY We had already introduced a change via a position statement that those sites handling products included within the GFSI remit were now on a 12-month audit frequency but this is now formally included within the Standard.
  Sites handling only consumer products are still eligible for an 18-month frequency of audit.

- UNANNOUNCED AUDITS A full unannounced option had been introduced to Issue 2 via a position statement which has now been formally brought into the Standard along with the second unannounced option which allows sites to have a blend
  of unannounced and announced elements in their audit.

- PRODUCT CATEGORIES Previously there were three product categories (chilled and frozen food, ambient food, and packaging and consumer products). This has now changed to four as we have separated out consumer products from
  packaging to make it easier to understand which sites are able to have an 18-month audit frequency