

BRCGS Food Safety Issue 9 Standard Additional Guidance and Compliance Tips

The BRCGS website, along with the Participate platform, provides extensive resources to help users fully understand the requirements of the Food Safety Standard.

These include:

- **Interpretation Guidelines**
- **Frequently Asked Questions (FAQ) Document**
- **Various Technical Guidelines**

A comprehensive list of all official BRCGS resources can be found in the **INDEX of Supporting Resources**, available online.

This document is designed to complement, not replace, the official BRCGS materials. It provides additional insights into certain clauses and audit protocol requirements, offering accurate interpretations where needed.

Please note, this is not an official BRCGS publication. It has been prepared by **ASK SONIA Ltd** and is regularly updated to include new information or to improve wording in order to clarify further certain points.

Part II Section 1 - Be Aware of Any Changes

Part of the compliance to section 1, across all BRCGS standards, including BRCGS Food Safety, is about the certified site being **'aware of any changes to the standard or protocol that are published on the BRCGS website'**.

Therefore, you need to know where to look to see whether there might have been any Position Statements issued for 'your standard'.

How to stay informed:

1. Go to the BRCGS.com website
2. Go to Resources
3. Scroll right to Position Statements: <https://www.brcgs.com/resources/position-statements/>

If there has been a position statement published or updated for 'your standard', you will find it there.

Regular checks of the BRCGS website can help ensure you're always aware of the latest position statements.

'BEING AWARE OF ANY CHANGES'

BRCGS Global Standard
FOOD SAFETY
ISSUE 9

Clause	Requirements
1.1.9	The site shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website.

BRCGS Packaging Materials

Clause	Requirements
1.1.6	The site shall have a genuine, original hard copy or electronic version of the current Standard and be aware of any changes to the Standard or protocol that are published on the BRCGS website.

BRCGS Agents and Brokers

Clause	Requirements
1.1.9	The company shall have a genuine, original, hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website.

BRCGS Storage and Distribution

Clause	Requirements
1.1.7	The company shall have a current, original hard copy or electronic version of the Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website.

BRCGS Global Standard
GLUTEN-FREE
ISSUE 4

Clause	Requirements
1.1.3	The site shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website.

BRCGS Global Standard
FOOD SAFETY
ISSUE 9

BRCGS WINNER
Global Standard
Food Safety Issue 9

**FOOD SAFETY
EUROPE
2023
SHORTLIST
BRCGS ATP of the Year**

Part II Clause 1.1.2 - Food Safety & Quality Culture Improvement Plan

During your BRCGS FS Issue 9 audit, the auditor will assess your business **Food Safety & Quality Culture Improvement Plan (clause 1.1.2)**.

** The auditor will NOT provide a score or a compliance status about the maturity of your business FS&Q culture.*

** They are NOT there to say 'your business FS&Q culture is great, weak, or not good enough'*

- The auditor will look and assess **'the plan'** and whether the company is giving itself the means to be on an **improvement path** regarding the FS&Q business culture, no matter where that improvement journey started from.
- The auditor will therefore want to see **4 key elements** during the audit:

1. Did the site carry out and document an **initial assessment of its FS&Q culture?** (ideally this involves a combination of staff surveys and/or interviews, review of the site performance against the existing FS&Q KPIs, and observations of food safety related staff behaviours)

2. From that initial assessment, did the site **identify its strengths and weaknesses and establish an action plan** designed to support and improve the FS&Q culture? (this should include clear activities with timelines and responsibilities listed, as well as a record of each activity completion status and an explanation as to how the efficiency of each activity will be measured and monitored)

3. **Is the Implementation of the action plan WIP** (work in progress)? Has it effectively started? (regardless of whether it is a 2-year plan, a 5-year plan etc, is there evidence that some of the activities planned have indeed happened?)

4. Has the site been **reviewing the plan at once every year** to be able to see what works well, what works not so well, what adjustments need to be made? (the auditor will want to see minutes of the review meetings and 'next steps' agreed).

So, to sum up, what the auditor is verifying during the audit, as far as clause 1.1.2 is concerned, is that **the site has adopted the PDCA concept (Plan-Do-Check-Act) for its FS&Q Culture, and that it is on a culture Improvement journey.**

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1.1.2 Food Safety & Quality Culture PLAN



PURPOSE

Vision
Values
Strategy
Targets
Metrics



PEOPLE

Empowerment
Reward
Teamwork
Training
Communication



PROACTIVITY

Awareness
Foresight
Innovation
Learning
Investment



PROCESS

Control
Coordination
Consistency
Systems
Premises

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Part II Clause 1.1.12 - Root Cause Analysis and Effective CAPA


Root Cause Analysis and effective corrective actions (CAPA) are at the very heart of the BRCGS standards.

Therefore, in your BRCGS Food Safety audit, **if you receive the same NC as In a previous BRCGS audit**, the auditor will:

- **raise that NC (without escalating its severity, ie if it was a minor, it will again be a minor),**
- **and also, they will raise an additional NC against clause 1.1.12, to indicate that the site's senior management has failed to address effectively and permanently an NC previously raised.**

To help clients and students remember this particularity of the standard and put in place effective CAPAs, I call 1.1.12 the 'BOGOF clause' (Buy One, Get One Free !!)




The 'BOGOF' clause



Clause
1.1.12

Requirements

The site's senior management shall ensure that the root causes of any non-conformities against the Standard identified at the previous audit have been effectively addressed to prevent recurrence.



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Part II Clause 2.7.1 - Food Fraud & HACCP plan

BRCGS want to ensure that sites take into account **the risk of food fraud being committed ON THE SITE**.

It is why **food fraud appears as an additional category of hazards** to consider in the HACCP study (clause 2.7.1 // Codex principle 1). Whether we agree with the idea or not is a separate topic :)

THIS is **on top of the more traditional vulnerability assessment** which sites must have developed to examine their vulnerability to food fraud being committed BEFORE the raw materials arrive on site (clause 5.4.3).



HACCP PLAN

BRCGS

Clause 2.7.1

Requirements

The HACCP food safety team shall identify and record all the potential hazards that are reasonably expected to occur at each step in relation to product, process and facilities. This shall include hazards present in raw materials, those introduced during the process or surviving the process steps, and consideration of the following types of hazard:

- microbiological
- physical contamination
- chemical and radiological contamination
- **fraud (e.g. substitution or deliberate/intentional adulteration)** (see section 5.4)
- malicious contamination of products (see section 4.2)
- allergen risks (see section 5.3).

It shall also take account of the preceding and following steps in the process chain.

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Logos: BRCGS Global Standard for Food Safety Issue 9, BRCGS Connect Winner, Food Safety Issue 9, Shortlist for the Year 2024.

Part II Section 3 - Documentation of Food Safety and Quality Management System

The BRCGS Food Safety standard requires that **policies, procedures, records, risk assessments, etc., be DOCUMENTED, whether this is explicitly spelt out or not** in the clause considered.




Documented... or not?

3 Food safety and quality management system

3.1 Food safety and quality manual

In many instances, the Standard specifically states that requirements shall be satisfied by documented procedures in others this is implied as the company needs to ensure consistent application throughout the site and show that systems are in place to demonstrate food safety to external stakeholders (including regulatory authorities, customers and the BRCGS auditor) The Standard therefore requires policies, procedures, records, risk assessments, etc., to be documented in sufficient detail to achieve these aims.



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Part II Clause 3.4.1 - Internal Audits

In the BRCGS FS Issue 9 standard, there is a requirement about **each and every internal audit within the programme needing to have a clearly defined scope.**

A clause title on its own isn't a well defined scope.

For a given clause, is the internal auditor required to:

- audit the site practices against the site procedures and the standard?
- or only against the site procedures as someone else will audit the procedures vs the standard?


- do they need to cover all relevant departments?
- or just a few selected departments because their audit is designed to follow up on a particular issue previously raised?

- do they need to go back 3 months? 6 months? a whole year? when checking records...
- or even further due to concerns in the organisation about archiving and back up systems?





- are they carrying the audit only on one site of a multisite group?
- or are they tasked with covering several/all sites within the group?
- ...

Each audit scope needs to be defined properly to ensure that the internal auditors are clear on what's expected of them, to ensure independence, also to ensure that 'nothing falls through the cracks' and all activities are audited, as per the standard requirements.

Internal Audits



Clause
3.4.1



Requirements

There shall be a scheduled programme of internal audits.

At a minimum, the programme shall include at least four different audit dates spread throughout the year. The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All activities that form a part of the site's food safety and quality systems, including those relevant to food safety, authenticity, legality and quality, shall be covered at least once each year.

The scope of the internal audit programme shall include, although this is not an exhaustive list:

- HACCP or food safety plan, including the activities to implement it (e.g. supplier approval, corrective actions and verification)
- prerequisite programmes (e.g. hygiene, pest management)
- food defence and food fraud prevention plans
- procedures implemented to achieve the Standard.

Each internal audit within the programme shall have a defined scope and consider a specific activity or a section of the HACCP or food safety plan.

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ASK SONIA Ltd
V1 – 12th Dec 2024

BRCGS Food Safety Issue 9 Standard
Additional Guidance and Compliance Tips

Part II Clause 6.2.3 - ERRATUM

There is a **printing error** in the BRCGS Food Safety Issue 9 Standard.

Clause 6.2.3 should list **4 bullet points, not 3 (packaging and labelling control requirements)**.

More detail in the image.

To access the erratum, you simply need to go back to the website where you initially downloaded your copy of the Food Safety Standard Issue 9 . The erratum can be downloaded for free from there.

The image shows a comparison between the current and corrected versions of Clause 6.2.3. On the left, the current version is shown with three bullet points. On the right, the corrected version is shown with four bullet points. The BRCGS logo and several award medals are displayed at the bottom left of the screenshot. The website address www.ask-sonia.com is visible at the bottom right.

ERRATUM Clause 6.2.3

#1 - copy currently says:

Clause	Requirements
6.2.3	Procedures shall be in place to ensure that all products are packed into the correct packaging and correctly labelled. These shall include checks: <ul style="list-style-type: none">• at the start of packing• during the packing run (e.g. at predefined intervals and when printed packaging or labels are brought to the line during the production run)• when changing batches of packaging materials at the end of each production run. The checks shall also include verification of any printing carried out at the packing stage.

#2 – copy should say:

Clause	Requirements
6.2.3	Procedures shall be in place to ensure that all products are packed into the correct packaging and correctly labelled. These shall include checks: <ul style="list-style-type: none">• at the start of packing• during the packing run (e.g. at predefined intervals and when printed packaging or labels are brought to the line during the production run)• when changing batches of packaging materials• at the end of each production run. The checks shall also include verification of any printing carried out at the packing stage.

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Part II Section 8 - Production risk zones

In the BRCGS Food Safety Issue 9 Standard, additional requirements (to what's listed from section 1 to section 7) are listed in section 8, specifically for High Risk (HR), High Care (HC) and/or Ambient High Care (AHC) areas.





There are 4 KEY differences between the HR and HC additional requirements.




See image for details.

8 Production risk zones – high risk, high care and ambient high care



4 key differences between HIGH RISK and HIGH CARE areas

 <p>There MUST be a physical segregation between HR areas and other parts of the site; this isn't compulsory for HC areas</p>	 <p>There MUST be sufficient changes of filtered air within HR zones; this isn't compulsory for HC areas</p>
 <p>The site MUST maintain a positive air pressure within HR areas, relative to surrounding areas</p>	 <p>Time segregation (to control micro contamination risks) is NOT PERMITTED within HR areas</p>



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Part II Section 9 - Traded Goods

In the BRCGS Food Safety Issue 9 Standard, **traded products** (section 9) are defined as **food products** that **would normally fall within the scope** of the Standard and are **stored at the facilities** of the site being audited, but that are not manufactured, processed, reworked, packed or labelled at that site.

'Traded products' **do not actually need to be 'traded'** by the certified site (ie, purchased and sold on) for section 9 to be applicable. **The requirements in section 9 will apply even if the 'traded products' are only stored on site**, for instance on behalf of a sister site.



9 Requirements for traded products

Traded goods/products	Traded products are defined as food products that would normally fall within the scope of the Standard and are stored at the site's facilities, but are not manufactured, processed, reworked, packed or labelled at the site being audited.
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Appendix 10 - Training vs Competence

In the BRCGS Food Safety Issue 9 Standard:

- the terms '**competent**', '**competence**', '**competency**' appear 50 times (I counted them... Nah, of course I did not!)
- and the terms '**training**', '**train**' or '**trainee**' are used 90 times!!

Better make sure we know what we're doing because the BRCGS auditor will be checking that we do!

- Be careful that a **training certificate alone is NOT a proof of 'competence'** and the auditor may/should want to see how the work is done, speak with people, and actually assess whether staff is COMPETENT for their jobs, not just that they have been trained.
- Equally, **where a clause requires to be able to demonstrate 'competence' but makes no specific mention to training being required**, if a site is not able to present a training certificate/record, it does not/should not (alone) give ground for an NC to be raised, so long as the site CAN demonstrate competence.
- One last thing, a few clauses say '**Where there is a legal requirement for specific training, this shall be in place**'. In those cases, you're expected to be able to show proof of training, NOT just of competence.

Appendix 10
Glossary

BRCGS

'Training' vs 'Competence'

Competence	Demonstrable ability to apply skill, knowledge and understanding of a task or subject to achieve intended results.
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Appendix 10 - Once annually

In the BRCGS Food Safety Issue 9 standard, a number of actions have to be carried out '**at least annually**' or the standard also says '**at a minimum annually**' or '**at least once each year**'.

What is meant is that the action needs to be done **at least once within the 12 months following the last time that action was carried out,**

and NOT 'once in every calendar year'.

NCs have been raised in certifying audits where this was misinterpreted by a site, resulting in, for instance, 15 months passing between two internal audits covering the same scope.

Appendix 10
Glossary

BRCGS

‘Once annually’ | ‘Once each year’

Annual/annually	Within 12 months since the action was last conducted.
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Appendix 10 - What is a label?

There are **55 references made to 'label', 'labelling' or 'labelled'** in the BRCGS Food Safety Issue 9 Standard,

of which 15 are in relation to fundamental clauses.

It is therefore very important to understand what BRCGS means by 'label' or 'labelling' in order to ensure compliance to all requirements.

A label is NOT always 'rectangle of paper' with printed information on it.

'Any tag, mark, picture or other descriptive matter, whether it is written, printed or otherwise marked, on or attached to the packaging of the product' is considered a label and must be treated as such by the site.

For example, pre-printed boxes, cans, sleeves, film, bottles are all examples of 'labels' in the sense of the standard.

Appendix 10 Glossary

What is a 'label' ?



Label	Any tag, mark, picture or other descriptive matter, whether it is written, printed or otherwise marked, on or attached to the packaging of the product. Where a product is unlabelled, specifications or information to meet legal requirements and to assist customers in the safe usage of the product shall be maintained, and are included in the definition of a label.
Labelling	Any words, picture or symbol relating to the food and placed on any packaging or label accompanying the product.



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Appendix 10 - Primary Packaging

In the BRCGS standards, a number of requirements apply to 'primary packaging'.

It is important to know that, in the world of BRCGS, '**primary packaging**' **does NOT mean 'food contact packaging'**.

Primary packaging includes food contact packaging, but also includes any other packaging elements making it into **the final 'unit of sale'** to the consumer or customer, **EVEN IF** some packaging elements are NOT food contact (eg a label applied to a bottle).

Yes I know, that's a lot more work for the sites!

Appendix 10
Glossary




Primary Packaging

BRCGS

Primary packaging

The packaging that constitutes the unit of sale to the consumer or customer (e.g. bottle, closure, label and tamper-evident seal of a retail pack or a raw material bulk container). When identifying primary packaging, due consideration must be given to the processes that minimise or eliminate any risk which may result in contamination of a food product; for example:

- using suitable food contact materials
- consideration of anything that is applied onto the surface of a permeable food contact material (e.g. potential for migration of ink components through cardboard is a well-documented risk that has affected a range of packaging).

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Appendix 10 - Raw Materials & Food Raw Materials

In the glossary of the Food Safety Issue 9 Standard, BRCGS distinguish between:

- **Raw Materials** (which include packaging) and
- **Food Raw Materials** (which do NOT include packaging).

There are **TWO clauses in the standard that contain requirements which specifically apply to FOOD raw materials** and which therefore don't currently have to be applied to packaging materials (although you can always do more than the minimum required of course).

The two clauses are 3.9.3 (traceability) and 5.4.3 (Food Fraud vulnerability assessment).

However:

- Please make sure to review 3.9.3 carefully. It contains important nuances, in particular around **packaging printed with legal or FS information**.
- You still need to comply with the RM assessment requirements (in 3.5.1.1) so do not dismiss packaging in your Food Fraud Vulnerability Assessment if you have identified a vulnerability to fraud in your initial RM assessment.

The diagram is titled "Appendix 10 Glossary" and features the BRCGS logo. It compares two definitions:

- Food raw materials:** Food ingredients, additives and processing aids used in the manufacture of a product.
- Raw material:** Any base material or semi-finished material used by the organisation for the manufacture of a product. Raw materials include food ingredients, packaging materials, additives, processing aids etc.

The two definitions are separated by a "not equal" symbol (≠). Arrows point from the "Food raw materials" definition to two BRCGS clauses: 3.9.3 and 5.4.3. The diagram also includes several award logos at the bottom: "GLOBAL STANDARD BRCGS APPROVED MANUFACTURING METHOD", "BRCGS CONNECTIVITY WINNER", and "FOOD ISSUE 9/21 SHORTLIST BRCGS 5 STARS FOR THE YEAR". The website "www.ask-sonia.com" is listed in the bottom right corner.

Index of supporting resources

For a list of published resources in relation to the BRCGS FS Issue 9 Standard:

1. Go to the [BRCGS.com](https://www.brcgs.com) website
2. Go to **Our Standards**
3. Select **Food Safety**
4. Go to the **Help & Guidance** section
5. Scroll down to **Technical Documents**
6. <https://www.brcgs.com/our-standards/food-safety/help-and-guidance/>



INDEX OF SUPPORTING RESOURCES FOR FOOD SAFETY AND START!

KEY

 Information for certification success	 Useful guidance
 Additional documents to support certification	 Other

NB¹: Some documents can be found in different languages this will be indicated by a "L" after the document title
NB²: Sites must ensure they are in "British Pounds" currency on the left-hand side when searching for these documents on the BRCGS Store

'Ask The Experts' Webinars Series

In order to support sites working with the Food Safety Issue 9 Standard, BRCGS regularly organises webinars on various food safety related topics. These are then recorded and made available for replay on the [BRCGS.com](https://www.brcgs.com) website.

Here are examples of webinars available:

- Food Safety Culture
- Production risk zoning – high risk, high care and high ambient high care
- Allergen management
- Internal audits
- 'Free-From Special' - Gluten-Free
- Labelling (on-pack)
- Food fraud
- Listeria management
- Managing food borne pathogens

To access the webinar series: <https://www.brcgs.com/about-brcgs/news/2023/ask-the-experts-food-safety-webinar-series/>



Issue 9 Top Non-Conformities 2023-2024

All PRPs related!!...

Top non-conformities of 2023-24

Clause	Description	NCs raised
4.11.1	Housekeeping and hygiene The premises and equipment shall be maintained in a clean and hygienic condition.	4,816
4.9.1.1	Chemical and physical product contamination control: raw material-handling, preparation, processing, packing and storage areas Processes shall be in place to manage the use, storage and handling of non-food chemicals to prevent chemical contamination.	3,758
4.4.8	Building fabric, raw material-handling, preparation, processing, packing and storage areas Doors (both internal and external) shall be maintained in good condition.	3,110
4.6.2	Equipment The design and construction of equipment shall be based on risk, to prevent product contamination.	3,090
4.4.1	Equipment Walls shall be finished and maintained to prevent the accumulation of dirt, minimise condensation and mould growth, and facilitate cleaning.	2,915



**Global Standard
FOOD SAFETY
ISSUE 9**



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BRCGS Integrity Visits

Once your site has been audited by the Certification Body, **it could be audited again by auditors mandated by the BRCGS themselves!**

This NOT a certification audit, but a compliance audit, or '**integrity visit**'.

- A BRCGS integrity visit will last one day regardless of the size of the site
- If it is going to happen to your site it will usually be within 3 months of your certifying audit
- You will get very little notice, sometimes none at all (13% compliance audits were unannounced in 2023)
- You could get new NCs (and your CB could get some too!)
- You have a contractual obligation to deal with those NCs just the way you would with your normal CB audit NCs, although, these new ones will not affect your site grade
- BRCGS aims to complete integrity visits on about 0.5% of certified sites each year

Technical governance of the Standard

Achieving consistency – compliance



BRCGS audits the offices of certification bodies and accompanies auditors at site audits to observe their performance. BRCGS also undertakes independent visits to certificated sites to ensure that standards of food safety and quality are being maintained in line with their certification status and that the audit and reporting process are to the expected standard.

In 2023, we completed 223 integrity visits in 33 countries covering a range of BRCGS Standards, with 13% of the visits completed remotely.



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Part III - The Certifying Audit

There are a number of items that the BRCGS Food Safety auditor MUST cover during the onsite audit, as a minimum (see image).

Opening meeting and closing meeting will always be first and last, respectively, in the agenda, but for the rest, the auditor is free to plan the way they see fit.

The auditor must aim to spend about 50% of their time in the factory (auditing production and site facilities, interviewing staff, observing processes and reviewing documentation in production areas with the relevant staff).

What will the BRCGS auditor look at during my site audit?



Opening meeting	Production facility inspection (e.g. site, production and storage)	Discussions with site staff and managers	Document review
Vertical audit, traceability challenge and mass balance	Verification of the product safety management system	Label review	Review of production facility inspection
	Final review of findings	Closing meeting	   www.ask-sonia.com

Brand Reputation through Compliance Global Standards

BRCGS means Brand Reputation through Compliance Global Standards

and not 'British Retail Consortium anymore 😊

It changed and early 2019 : <https://www.brcgs.com/about-brcgs/news/2019/brcgs-unveils-new-visual-identity-and-plans-for-2019/>

