

BRC Certification Guide

Introduction

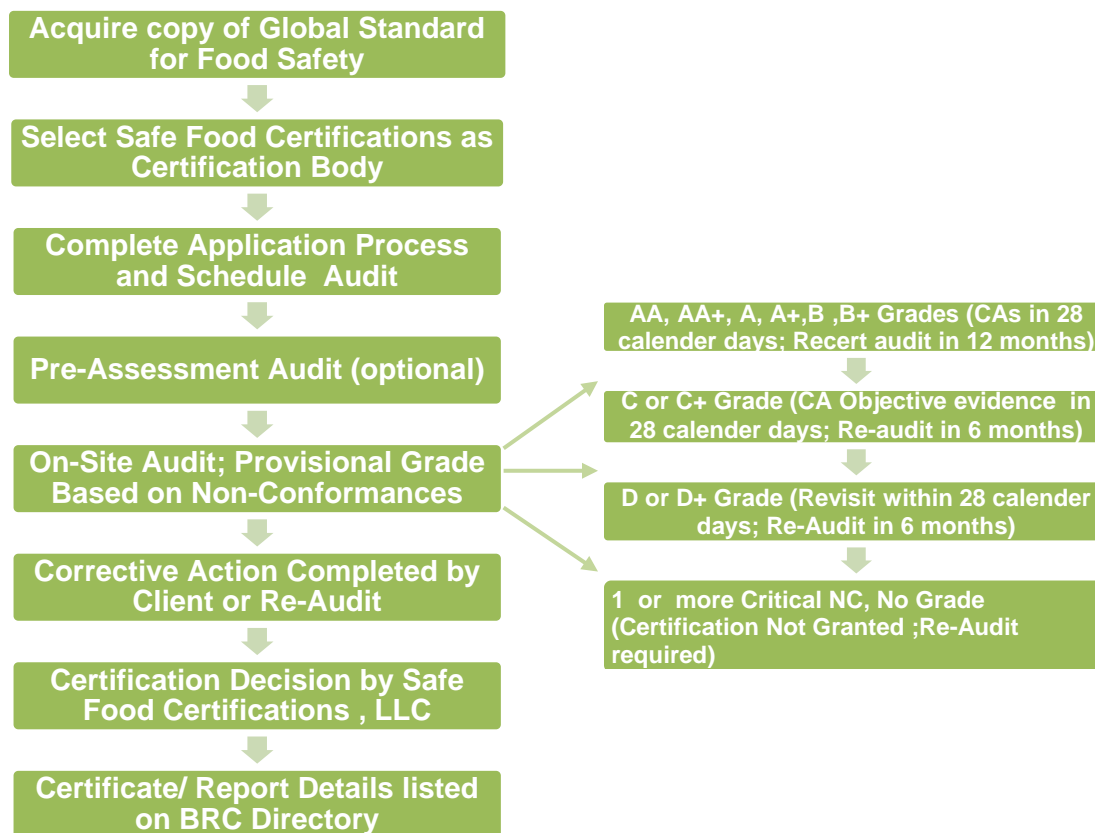
Safe Food Certifications, LLC provides certification services to clients in accordance with the requirements of the BRC Global Standard for Food Safety.

Safe Food Certifications fully complies with ISO/ IEC 17065 requirements for bodies certifying products, processes, and services.

Safe Food Certifications is committed to maintaining the following throughout the application, audit, and certification process:

- Impartiality
- Independence
- Confidentiality
- Objectivity

Overview of BRC Global Standard for Food Safety Certification Process



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Application Process

- ✓ Visit the BRC Global Standard website for an overview of the certification process. A free copy of the Global Standard for Food Safety Issue 8 can be downloaded from:
 - <http://www.brcgs.com>
- ✓ Select Safe Food Certifications, LLC as your Certification Body.
- ✓ Contact Safe Food Certifications for the Company Profile Application, complete, and return.
- ✓ Upon application review, Safe Food Certifications shall:
 - confirm scope of certification
 - determine audit category and audit duration
 - assign a qualified auditor based on risk and audit category
 - suggest tentative dates for audit based on scope and recertification timeframes where applicable
 - provide quote for certification services
- ✓ Once the client accepts the quote for services and confirms date of audit, SAFE FOOD CERTIFICATIONS shall inform the client of the assigned auditor and provide the Certification Service Agreement for approval by client.

Special Note: Clients are advised to read scope defined in agreement carefully and ensure accuracy as scope cannot be altered once the on-site audit begins.
- ✓ Clients may object to the assigned auditor in writing within 7 calendar days from date Agreement is provided to client only where a conflict of interest exists and request assignment of an alternate auditor. Objections to an auditor after 7 days of providing Agreement cannot be honored. Conflict of interest is defined as the following:
 - Auditor provided consulting for site within previous two years
 - Auditor has a financial interest in site that would bias the auditor's ability for objective evaluation
 - Auditor has a personal relationship with site personnel that would bias the auditor's ability for objective evaluation

Conflict of interest must be disclosed when objecting to assigned auditor.

Certification Audit

The scope of the audit- products produced and manufacturing processes – shall be agreed between the supplier and Safe Food Certifications in advance of the audit to ensure the allocation of an auditor with the correct food sector category. The audit scope and all exclusions shall be clearly defined both on the audit report and any certificate issued (please refer to sections **Exclusion from Scope or Reduction of Scope** and **Extension of Scope** at the end of this document).

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The certification audit is an assessment of the site's food safety and quality systems according to the Global Standard for Food Safety. Compliance to the requirements of the standard is determined through the following activities. Objective evidence (i.e., procedures, records, interview responses, direct observations, etc.) resulting from activities described below shall be collected by the auditor for the purpose of documenting compliance or non-compliance to Global Standard requirements in the audit report.

- opening meeting with key personnel
- document and records review
- site tour
- interviews with various staff at all levels in the organization
- direct observation of processes
- verification of the effectiveness of tests and records

An audit plan is provided to the client prior to the start of the certification audit.

Non-Conformances

Non-conformances against standard requirements are identified as minor, major, and critical. Specifics regarding each category of non-conformity and are detailed in the Global Standard for Food Safety.

A summary of Grading Criteria and Recertification Requirements are outlined in Table 1.

Additionally, grade criteria resulting from identified non-conformances during the on-site audit and corresponding action regarding recertification are also detailed in the Global Standard for Food Safety.

A provisional grade and list of agreed to non-conformances shall be provided during the closing meeting.

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Table 1. Summary of Grading Criteria and Recertification Requirements- BRC

Grade	Critical Non-Conformance	Major Non-Conformance	Minor Non-Conformance	Corrective Action	Audit Frequency
AA, AA+			5 or fewer	Objective evidence within 28 calendar days	12 months
A, A+	0	0	6 to 10	Objective evidence within 28 calendar days	12 months
B, B+	0	0	11 to 16	Objective evidence within 28 calendar days	12 months
B, B+	0	1	10 or fewer	Objective evidence within 28 calendar days	12 months
C, C+	0	0	17 to 24	Objective evidence within 28 calendar days	6 months
C, C+	0	1	11 to 16	Objective evidence within 28 calendar days	6 months
C, C+	0	2	10 or fewer	Objective evidence within 28 calendar days	6 months
D, D+			25 to 30	Re-visit required within 28 days	6 months
D, D+		1	17 to 24	Re-visit required within 28 days	6 months
D, D+		2	11 to 16	Re-visit required within 28 days	6 months
Not Certified	1 or more			Certification Not Granted; Re-Audit Required	N/A
Not Certified			31 or more	Certification Not Granted; Re-Audit Required	N/A
Not Certified		1	25 or more	Certification Not Granted; Re-Audit Required	N/A
Not Certified		2	17 or more	Certification Not Granted; Re-Audit Required	N/A
Not Certified		3 or more		Certification Not Granted; Re-Audit Required	N/A

Note: + in grading indicates unannounced audit

Corrective Action

Clients are responsible for documenting corrective action and root cause responses on the Non-Conformity Report and Action Summary provided during the closing meeting for each assigned non-conformance along with objective evidence within 28 calendar days from the last day of the audit.

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Corrective action responses must fully correct the non-conformance to the requirement and evidence of the correction must be provided. Root cause analysis for each non-conformance must be performed and documented. Refer to *Understanding Root Cause Analysis* (2012) published by BRC Global Standards.

Evidence may include updated procedures, records, work orders, purchase orders, photos, or other physical evidence demonstrating implementation of the correction.

The auditor and certification body shall verify all corrective actions before closing out the non-conformance.

Where satisfactory evidence is not provided within 28 calendar days from the last day of the audit, certification shall be denied and the client must contract for a subsequent full audit.

Re-certification Audit

Re-certification audits shall be conducted at six or twelve month intervals depending upon audit outcome.

Re-certification audits are full audits performed according to BRC requirements for application, audit duration, evaluation, review, and certification.

Clients are responsible for contacting Safe Food Certifications 90 days prior to the start of the re-audit period regarding scheduling the re-certification audit.

Failure of the client to allow re-certification or surveillance audits to be conducted at required frequencies may result in suspension or withdrawal of certification.

Surveillance Audit

The surveillance audit is conducted when the supplier receives a "C or D" grade at a certification audit or re-certification audit. The certification duration is granted for 6 (six) months only. The onsite visit by the CB auditor shall be conducted within 28 days from the last day of audit to review corrective actions. The surveillance audit, i.e. a full scale audit shall be conducted within the six (6) months from the last day of the previous certification or re-certification audit. A new score and rating is issued at the surveillance audit, however the re-certification audit date remains the same (i.e. at 28 days audit window – from the last day of the initial audit date).

Surveillance audits refer to announced or unannounced visits initiated by Safe Food Certifications or BRC for the certificated sties, which may be conducted as a full or partial audit to validate continued certification.

Safe Food Certifications or BRC shall notify clients directly where surveillance audits are required.

Certification Decision

Safe Food Certifications assigned technical reviewer - Executive Director, Technical Director or a designate - shall review the auditor's report and initial recommendation for certification. Technical

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reviewer shall perform an independent, objective, and comprehensive technical review of the audit report, all audit findings, and corrective actions.

Technical reviewer shall independently and impartially make the Certification Decision to grant or deny certification within 42 days of the last day of audit.

Certificate and Logo Use

Safe Food Certifications shall upload the audit report to the BRC Directory within 42 days of the last day of audit and generate the certificate. Basic information pertaining to certification is made available for public display. The client may elect to allow customers visibility to specific details of certification.

Upon certification, clients receive:

- A final audit report
- A BRC Certificate with a unique site code
- BRC Terms of Certification including the use of the BRC Logo
- Information on Safe Food Certifications Complaints and Appeals process

Exclusion from scope (to be confirmed by supplier and Safe Food Certifications prior to audit)

The exclusion of products produced at a site will only be acceptable where:

- The excluded products can be clearly differentiated from products within the scope

AND

- The products are produced in a separate part of the factory

Where exclusions are requested these shall be agreed with Safe Food Certifications in advance of the audit. Exclusions shall be clearly stated on the audit report and certificate and the justification recorded on the audit report.

The certification of products must include audit of the entire process from raw material to end-product dispatch. It is not possible to exclude either parts of the process undertaken at the site or parts of the Standard. Where exclusions are accepted, the auditor shall assess any hazards presented by excluded areas or products (e.g., the introduction of allergens or foreign body risks) and non-conformities may be raised relating to the excluded area where this poses a risk to the products within the audit scope.

Additional manufacturing locations and head office assessment

The audit scope is expected to be site specific. There are, however, exceptional circumstances where the activities are undertaken at more than one location and where these can be included with a single report and certificate. This includes:

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The audit of a head office to review procedure controlled from head office

The audit of more than one location where a single production process is carried out across two sites.

Refer to detailed requirements in Appendix 4 of the recent version of BRC Global Standard for Food Safety

Storage facilities – off-site

While the storage facilities on the same site as the production facility shall always be included within the audit of the site, it is not uncommon for sites to also own additional off-site storage facilities. Where additional storage facilities are owned and managed by the company in the vicinity of the production site (i.e. within a radius of 50 km or 31 miles), these shall be identified on the audit report and either audited as part of the site audit or specifically excluded.

Extension of scope after granting a certificate

Once certification has been granted, any additional significant products manufactured or processes undertaken by the site, which are required to be included in the scope of certification, must be communicated to Safe Food Certifications. Safe Food Certifications shall assess the significance of the new products or processes and decide whether to conduct a site visit to examine the aspects of the required extension of scope. The current certificate will be superseded by any new certificate issued, using the same expiry date as detailed on the original certificate.

A revisit is required before granting a scope extension in the following circumstances:

- Inclusion of manufacturing facilities not taken into account in the original audit.
- Inclusion of a new processing technology, for example, canning of low-acid products where formerly only high-acid products were within the scope.
- Inclusion of new products which introduce a significant new risk to the facility, e.g., addition of a nut-based product to a previously allergen-free facility.

A revisit is less likely where:

- New products are extensions to the existing ranges produced on existing equipment. Where an extension to scope is required shortly before the certificate is due to expire, it may be more appropriate to undertake a full audit and issue a new certificate. This option should be agreed between Safe Food Certifications and the client prior to undertaking the extension to scope audit.
- When a revisit is considered necessary, the site visit should be conducted along the same principles as the original audit (i.e., including an opening meeting, inspection of the operation of the process, documentation trails and closing meeting). The revisit should be announced, irrespective of whether the site is certified to the unannounced or announced audit.

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- Identified non-conformities should be documented and actioned within the normal protocol of the Standard (i.e., the supplier has 28 days to provide appropriate evidence of close out and Safe Food Certifications should review the information and confirm the certification decision in the normal manner). The additional non-conformities raised at the site visit will affect neither the current certificated grade nor continued certification. However, if practices are seen that give Safe Food Certifications cause to doubt continued certification (e.g., the identification of critical non-conformity) then Safe Food Certifications shall arrange a full re-audit of the site. In these circumstances the current certificate shall be withdrawn.
- A visit report should be documented, but shall not be in the format a standard BRC audit report. A short explanation of the nature of visit, what was specifically audited and the conclusion should be given. The visit report should document what controls are in place and confirm the effectiveness of these controls. It should be clear in the report what aspects were looked at and what was excluded.
- The site's current certificate will be suspended by any new certificate issued. The certificate must use the same expiry date as detailed on the original certificate. The due date of the next full audit will therefore remain the same and this should be made clear to the supplier by Safe Food Certifications when arranging extension to scope visits. The grade shall also remain the same.
- The certificate should include identification that it was a scope extension and the date of the visit.

Extension of audit scope prior to the audit onsite

When a Supplier elects to expand a scope of certification onsite prior to the beginning of an audit, including but not limited to adding packaging material, adding a process step, etc., without requiring the addition of a distinct food sector category or HACCP plan, the change must be discussed with the auditor prior to the beginning of the audit. The auditor shall then contact (if warranted) Safe Food Certifications to approve such changes or shall approve such changes and document the change on the audit plan (noted on the facility audit schedule). The auditor and a representative of the auditee shall sign the change made on the audit plan with the same date prior to beginning the audit.

REFERENCES:

BRC Global Standard for Food Safety, Issue 8.

BRC004: Requirements for CBs Offering Certification against the Criteria of BRCGS . Sept. 2019