# BRC GLOBAL STANDARDS Issue 8 Key Changes



August 23, 2018

#### DNV·GL

Global Standard Food Safety - BRC Food, Issue 8

Changes and challenges for the organizations

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#### **Our experts:**



#### Presented by:

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- $\checkmark$  The experts on this webinar are from:
- √the standard itself
- ✓a certification body
- ✓ a food safety management software company

and will explain how to approach the update to the standard holistically - from every angle of the work required to be done in your companies.



# BRC Global Standards Food Version 8

John Kukoly Americas Director BRC Global Standards





# Background to Issue 8

The consultation and review of emerging food safety concerns identified a number of opportunities for further development since the publication of Issue 7.

Therefore the key objectives were identified as:

- align Issue 8 with the proposed GFSI benchmark requirements
  - o environmental monitoring
  - o food defence/product security
- continue activities to reduce the burden of duplicate, private audits of certificated sites
- consider any potential implications of the US Food Safety Modernization Act (FSMA) requirements
- consider the practicalities of including product safety culture within the Standard
- · review of the scope of the Standard
- review issues, incidents & recalls
  - o product labelling

# Food 8 Timing







# KEY CHANGES TO THE REQUIREMENTS

# Management Commitment





INCREASED IMPORTANCE AND FOCUS DURING THE AUDIT. INTERVIEWS WITH SENIOR MANAGEMENT FOOD SAFETY AND QUALITY CULTURE AND OBJECTIVE SETTING



## Food Safety Culture

#### Background & Objective

- Food safety culture is a fundamental factor in the management of product safety
- While challenging to audit, it is important that food safety culture is considered within a site and therefore within the requirements of the Standard

#### Requirement

• Sites shall plan to maintain and develop product safety and quality culture within the business



1.1.2	The site's senior management shall define and maintain a clear plan for the development and continuing improvement of a food safety and quality culture . This shall include:
	<ul> <li>defined activities involving all sections of the site that have an impact on product safety</li> <li>an action plan indicating how the activities will be undertaken and measured, and the intended timescales</li> <li>a review of the effectiveness of completed activities.</li> </ul>

Auditors will **NOT** be attempting to audit the culture of the site but will be looking at how sites have implemented the bullet points. Effectiveness will be assessed only on the 2<sup>nd</sup> issue 8 audit



# **Reporting Issues**

## Background & Objective

- Product safety is the responsibility of all staff not just a select few
- Therefore all staff need to know how to report concerns and incidents

#### Requirements

- Clause 1.1.5 amended staff understanding importance
- Clause 1.1.6 added confidential reporting system needed



	1.1.5	The site shall have a demonstrable meeting programme which enables food safety, legality, integrity and quality issues to be brought to the attention of senior management. These meetings shall occur at least monthly.
		Employees shall be aware of the need to report any evidence of unsafe or out
		of specification product or raw materials, to a designated manager to enable
		the resolution of issues requiring immediate action.
1	1 1	

1.1.6	The company shall have a confidential reporting system to enable staff to report concerns relating to product safety, integrity, quality and legality.
	The mechanism (eg the relevant telephone number) for reporting concerns must be clearly communicated to staff.
	The company's senior management shall have a process for assessing any concerns raised. Records of the assessment, and where appropriate actions taken, shall be documented.



## HACCP/Food Safety Plan

#### Background & Objective

- Some countries (eg the USA) have regulatory requirements that incorporate all HACCP processes outlined by Codex Alimentarius but use different terminology.
- Review wording for section 2 of the Standard on the HACCP Food Safety Plan to ensure compatible in all countries and geographies.

#### Requirements

• Sites are required to meet the requirements of the Standard - specific terminology should not be an impediment to demonstrating compliance.



## **Internal Audits**

## Background & Objective

- Internal audits are one of the most powerful tools that a site has
- It is clear from the non-conformities raised and from our own compliance audits that many sites are still not effectively scheduling their internal audits throughout the year - where audits are only completed once or twice a year the system is more likely to lead to drops in standards between audits

## Requirements

 Clause 3.4.1 amended to make sure that the safety management systems are being assessed in depth at regular intervals – at least 4 audit dates per year





# Supplier Approval

#### Background & Objective

- Safety, integrity, legality and quality of raw materials are fundamental to the site's operations
- GFSI benchmarking

#### Requirements

• All of the requirements reviewed and updated to ensure rigorous control controls of raw materials whilst maintaining practical application



# Primary packaging

The packaging which constitutes the unit of sale to the consumer or customer (e.g. bottle, closure and label of a retail pack or a raw material bulk container).



## Product security & food defence

#### Background & Objective

- Rigorous food defence systems have gained renewed understanding and should form an integral part of factory protocols
- Procedures adopted to assure the safety of raw materials and products from malicious contamination or theft

#### Requirements

- Threat (risk) assessment with actions (a plan) based on risk.
- Scope of the risk (threat) assessment the same as the process flow diagram (clause 2.5) i.e. all stages when product is under the management control of the site.

4.2.1	The company shall undertake a documented risk assessment (threat assessment) of the
	potential risks to products from any deliberate attempt to inflict contamination or damage.
	This threat assessment shall include both internal and external threats.
	The output from this assessment shall be a documented threat assessment plan. This plan shall be kept under review to reflect changing circumstances and market intelligence. It shall be formally reviewed at least annually and whenever:
	<ul> <li>a new risk emerges (e.g. a new threat is publicised or identified)</li> <li>an incident occurs, where product security or food defence is implicated.</li> </ul>
4.2.2	Where raw materials or products are identified as being at particular risk, the threat
	assessment plan shall include controls to mitigate these risks. Where prevention is not
	sufficient or possible, systems shall be in place to identify any tampering.
	These controls shall be monitored, the results documented, and be subject to review at least annually.
4.2.3	Areas where a significant risk is identified shall be defined, monitored and controlled. These shall include external storage and intake points for products and raw materials (including packaging).
	Policies and systems shall be in place to ensure that only authorised personnel have access to production and storage areas, and that access to the site by employees, contractors and visitors is controlled. A visitor recording system shall be in place.
	Staff shall be trained in site security procedures and food defence.
4.2.4	Where required by legislation, the site shall maintain appropriate registrations with the relevant authorities.

BRC GLOBAL STANDARDS



## **Physical Contaminants**

### Background & Objective

- Obviously vital that physical contamination of products is prevented
- Historically, the Standard has predominantly focused on metal detection
- There are some known potential contaminants that need site management

#### Requirements

- Contamination of products or raw materials from packaging materials e.g. during deboxing or debagging
- Control of pens e.g. exclusion of pens with small detachable parts and detectable by foreign body detection equipment



# **Environmental Monitoring**

#### Objective

- Introduce an important tool for identifying potential contamination risks
- Sites to develop a rigorous monitoring programme, enabling timely corrective action before product contamination occurs

#### Requirements

- Monitoring of all factory production areas as a minimum areas with open ready to eat products
- Risk based programme developed
- Pathogens, spoilage organisms and/or indicator organisms should be considered

## **Environmental Monitoring**



#### 4.11.8 ENVIRONMENTAL MONITORING

Risk-based environmental monitoring programmes shall be in place for pathogens or spoilage organisms. At a minimum, these shall include all production areas with open and ready-to-eat products.

4.11.8.1 Program designed properly4.11.8.2 Appropriate limits and corrective actions4.11.8.3 Review triggers

# Environmental monitoring clauses



# 4.11.8.1 The design of the environmental monitoring programme shall be based on risk, and as a minimum include:

- sampling protocol
- identification of sample locations
- frequency of tests
- target organism(s)
- test methods (eg settle plates, rapid testing, swabs)
- recording and evaluation of results

The programme and associated procedures shall be documented.



## **Production Risk Zones**

#### Objective

- To promote understanding and best practice for the manufacture of products that require high risk, high care or ambient high care areas.
- Review the requirements to ensure practical application without reducing the effectiveness of the current requirements.

#### Requirements

- Requirements remain largely unchanged from Issue 7 to Issue 8.
  - Equipment received back following maintenance
  - Waste management
  - Portable equipment
- Requirements have been relocated into a single, newly created, section of the Standard (section 8).
- Protocol and definitions reviewed and update for increased clarity



# KEY CHANGES TO THE PROTOCOL



# Interim reporting

#### Background

• One of the consistent concerns raised by key stakeholders (eg customers, certificated sites, regulators) is the time gap between audit and confirmation of certification (certificate & audit report).

#### New Protocol

- Following each audit an 'interim' report shall be available on the BRC Directory within 10 calendar days.
- Contents strictly limited to date of audit, details of the audit scope and the non- conformities found.
- Final audit report will still be available after 42 days currently being designed



# Where to find help

- Interpretation Guideline
- Key Changes Document
- FAQs Published October onwards
- 'Understanding' Guidelines (22 for Issue 8)





# **FoYour Training options**

Target Audience	Course	Duration
Existing Food 7 ATP's	Food 7-8 Conversion for Trainers	3 Days
New ATP's	Food 8 TTT	4 Days
Existing Food 7 Auditors	Food 7-8 Conversion for Auditors	2 Days
New Auditors	Food 8 Lead Auditor	5 Days
New Auditors with Lead Status	Food 8 Auditor	3 Days
Sites	Food 7-8 Conversion for Sites	1 Day
Sites	Food 8 Sites	2 Days



Global Markets – Food Targeting very small, and developing suppliers

- New auditor requirements
  - Field of Audit, no categories
  - 2 years experience
  - 2 training audits
- Reduced cost
- New protocol
  - Auditors able to provide guidance for improvement
- Launch late September

# **FSMA Module**



- Active August 2018
- Most used module ~ 500 sites



# SUPPLY CHAIN MANAGEMENT

## IT'S TIME TO CHANGE THE CHAIN



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## **ATTEMPT #1**





ATTEMPT #2

HOW?

<u>Network</u> suppliers and customers seamlessly share documentation <u>Extract</u> data from thousands of industry required documents

## **REVOLUTIONIZE INFORMATION EXCHANGE** ACROSS THE SUPPLY CHAIN

# STANDARD FORMS 17 Standardized



# **ALLERGEN DASHBOARD**

Major Allergens

Show Inactive

tem ID 🔺	Item Name	Supplier ID	Supplier Name	Item Status	Item Action	Peanut	Egg	Tree Nuts	Dairy	Crustaceans	Mollusks	Gluten	F
07-TNL	Tiger Nuts	000047	Hondo Food Distributors	Warning 👻	Accept	No	No	No	No	No	No	No	No
DA-FLF	White Flour	000041	Basic Ingredients, Inc Minneapolis		Accept	No	No	No	No	No	No	No	No
DA-FLF	White Flour	000009	Baking Supplies Central	Warning 🗸	Accept	Same Manufacturing Plant	No	Same Manufacturing Plant	No	No	No	No	No
0A-FLF	White Flour	000014	Byco Food Products		Accept	No	No	No	No	No	No	No	No
0A-FLF	White Flour	000042	Basic Ingredients, Inc Green Bay	Out Spec 👻	Accept	No	No	No	No	No	No	No	No
DA-JAJ	Jasmine Absolute Egyptian	000042	Basic Ingredients, Inc Green Bay		Accept	No	No	No	No	No	No	No	No
DA-JAJ	Jasmine Absolute Egyptian	000049	NutraGlobe		Accept	No	No	No	No	No	No	No	No
DA-JAJ	Jasmine Absolute Egyptian	000003	Azina Foods - Salt Lake City Hq		Accept	No	No	No	No	No	No	No	No
DA-JAJ	Jasmine Absolute Egyptian	000041	Basic Ingredients, Inc Minneapolis		Accept	No	No	No	No	No	No	No	No
)A-RAR	Raisin 70 Brix	000049	NutraGlobe	Warning 👻	Accept	No	No	No	No	No	No	No	No
)A-RAR	Raisin 70 Brix	000004	Azina Foods - Seattle		Accept	No	In Product	No	In Product	No	No	No	No
0B-ID <mark>I</mark>	Idf Frozen Chicken Broth 32%	000026	Indiana Co-Op Farms		Accept	No	No	No	No	No	No	No	No
DE-FDF	Fd&C Yellow #5 Granular	000035	Number One Ingredients, Inc.		Accept	No	No	No	No	No	No	No	No
DE-OIO1	Oil Lemon Calf. Type C.P. Extra Fcc	000003	Azina Foods - Salt Lake City Hq		Accept	No	No	No	No	No	No	No	No
0H-OIO	Oil Thyme-Red	000024	H. Umberge & Co.		Accept	No	No	No	No	No	No	No	No
01-0102	Oil Dill Weed 30-32%	000024	H. Umberge & Co.		Accept	No	No	No	No	No	No	No	No
01-0104	Oil Pimento Leaf N.F.	000024	H. Umberge & Co.		Accept	No	No	No	No	No	No	No	No
DO-MOM	Molasses Light Amber Unsulfured	000009	Baking Supplies Central	Warning 👻	Accept	Same Manufacturing Plant	No	Same Manufacturing Plant	No	No	No	No	No
00-SFGS	S.E.Foenugreek Seed Fr	000031	K Lynn Specialty Foods, Inc.	a	Accept	No	Same Manufacturing Plant	Same Manufacturing Plant	No	No	No	No	No
JP-OIO	Oil Spearmint N.F.	000003	Azina Foods - Salt Lake City Hq		Accept	No	No	No	No	No	No	No	No
DR-OIO	Oil Grapefruit	000003	Azina Foods - Salt Lake City Hq		Accept	No	No	No	No	No	No	No	No
DU-AUA	Aubepine Liquid (Anise Aldehyde)	000025	Hepa Ingredients & Flavors		Accept	No	No	No	No	No	No	No	No

= -

Filter

Clear

Import

Export

# MAPPING REQUIRED DOCUMENTS

raceG		Task Schedule	Documents	Misc Logs	Prerequisite	Controls	Verify & Validate	Preship & Signof	f Training	CARs		Need Help?	Configuration
							DROP FILE	S HERE				_	
BRC	Documents	Shov	w Archived							New	Save ≡ -	Filter C	lear Import
	Comments		Туре ⊾		State	s	Workflow	Effective Date	Expiration Date	File Name	Doc Create	ed By Doc	Creation Date
	•	BRC											
\$	<b>—</b>	BRC 1.1.1 - Mar	nagement Commi	tment	In Developme	ent	Level 2 Approval	11/15/2015	12/1/2018	BRC Document.	pdf das@tracega	ins.com 6/27/2	017 6:05:00 PM
\$	-	BRC 1.1.10 - Ro	oot Cause Resolu	tion of any Pre	Approved		Completed	7/28/2016	8/1/2019	BRC Document.	pdf das@tracega	ins.com 6/27/2	017 6:05:03 PM
•	-	BRC 1.1.2 - Obj	ectives of Food S	afety Program	Missing								
\$	-	BRC 1.1.3 - Min	utes of Mgt Revie	ews of BRC Pro	Approved		Completed	8/11/2016	9/1/2018	BRC Document.	pdf das@tracega	ins.com 6/27/2	017 5:57:20 PM
\$	<b>F</b>	BRC 1.1.4 - Mee	eting schedule for	meetings to di	. Awaiting App	roval	Escalate	5/2/2017	5/31/2019	BRC Document.	pdf das@tracega	ins.com 6/27/2	017 5:57:18 PM
\$	-	BRC 1.1.6 - Plar	n for Informing Sta	aff about Latest	Approved		Completed	2/14/2016	2/14/2018	BRC Document.	pdf das@tracega	ins.com 6/27/2	017 6:19:33 PM
\$	-	BRC 1.1.9 - Min	utes of audit mee	tings	Approved		Completed	9/14/2015	10/1/2019	BRC Document.	pdf das@tracega	ins.com 6/27/2	017 6:04:40 PM
\$	-	BRC 1.2.1 - Ann	notated Org Chart	from Food Saf	. Approved		Completed	7/28/2016	8/1/2019	BRC Document.	pdf das@tracega	ins.com 6/27/2	017 6:19:37 PM
\$	<b>F</b>	BRC 2.1.1 - Plar	nt HACCP Plan		Awaiting App	roval	In Review	3/21/2016	4/1/2018	BRC Document.	pdf das@tracega	ins.com 6/27/2	017 6:04:43 PM
\$	-	BRC 2.10.1 - Mo	onitoring procedur	re for each CC	Approved		Completed	11/15/2015	12/1/2018	BRC Document.	pdf das@tracega	ins.com 6/27/2	017 6:04:47 PM
\$	-	BRC 2.10.2 - Mo	onitor records for	each CCP/PR	Approved		Completed	7/28/2016	8/1/2019	BRC Document.	pdf das@tracega	ins.com 6/27/2	017 6:19:44 PM



# **PREPARING FOR CONVERSION**

TraceGains aceGains BASE - QM	Task Schedule	Documents	Misc Logs	Prerequisite	Controls	Verify & Validate	Preship & Signoff	Training	CARs
		-	•				D	ROP FILES H	IERE
All Documents 👻	Show Arc	hived							
Manage Dashboar	ds	Туре 🔺		Doc Statu	S	Workflow	Effective Date	Expiration	n Date File Na
Filter									
All Documents BRC Documents	1.1.10 - Root	Cause Resolutior	of any Pre	Missing					
FSMA Documents	1.1.2 - Object	ives of Food Safe	ty Program	Missing					
SQF Ed. 7	1.1.3 - Minute	s of Mgt Reviews	of BRC Pro	Missing					
SQF Ed. 8	1.1.4 - Meetin	g schedule for me	eetings to di…	Missing					
•	BRC 1.1.6 - Plan fo	or Informing Staff	about Latest	Missing					
•	BRC 1.1.9 - Minute	s of audit meeting	IS	Missing					
•	BRC 1.2.1 - Annota	ited Org Chart fro	m Food Saf	Missing					
•	BRC 2.1.1 - Plant H	ACCP Plan		Missing					

# **Success Stories**





CHEVOO went from a gravel lot to running a full facility that was GFSI certified in 5 months, thanks to TraceGains Quality Management software. In fact, the auditor kept saying "this software is great. It cuts the time in half because you don't have to go looking for all your paperwork."

-Cherienne Griffith



# **Success Stories**



"Our different food companies have different audits they need to satisfy. We needed to make sure that we had a platform that satisfies all the different requirements."

-Wendy White



# **Success Stories**

# Mountain Man Nut & Fruit Co."



"Auditors can just go through the laptop. They show up and say they want to be here for two days. I want them to be gone in a day-and-a-half."

-John E. Forde IV



# **CAN YOU PROVE IT?**



Sr. Mgmt Commitment Continuous Improvement Food Safety Plan/HACCP Internal Audits Supplier Approval & Monitoring Corrective & Preventative Actions Sanitation Allergen Control Proof of Authenticity Training Logs

# We are here to help to achieve your certification goals!

## Thank you!

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