The Ultimate Guide to BRC Audits and Certifications

Issue 9

SAFETYCHAIN

Contents

Food safety and quality are always top priorities for food and beverage manufacturing operations. Managers must establish and enforce effective food safety programs, and ensure plant policies and procedures align with local, state, and federal laws and regulations, to remain compliant.

While government agencies like the FDA help establish laws, regulations, and guidelines for food safety and quality, the globalization of the supply chain has led to the development of many internationally-recognized food safety certifications, including the British Retail Consortium Global Standard (BRC) certification.

For organizations involved in the manufacturing, handling, production, or packaging of food products, the BRC certification is a popular food safety and quality program, recognized (and sometimes required) by consumers and many agencies throughout the world.

There are specific requirements to become BRC certified, and operations seeking the BRC certification must first undergo a third-party audit to determine if their plant is in compliance with the standards set by BRC.

Recently, the BRC released its latest Standard - Issue 9 - which includes a few changes to their requirements, enforceable as of February 2023.

This guide will help plant managers and other members of management teams understand and prepare for the BRC audit process in relation to Issue 9 requirements.

Most Common Global Food Compliance Issues for US-Based Plant Managers

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Food quality and safety regulations help prevent food contamination, reduce incidents of foodborne illness, improve labeling for consumers, and reduce food industry fraud. The main priority of these regulations and laws is consumer safety, but manufacturers benefit from them, too.

Many international manufacturers are challenged with food safety and compliance within the rapidly growing global supply chain, including:

1. Language and cultural barriers make communication difficult.
2. Varying regulations and standards; from different geographies to frequent updates.
3. Supply chain complexity
4. Fraud and adulteration when working with suppliers overseas.
5. Traceability.

Thankfully, as more global standards for food quality and safety are established, the easier it will be for manufacturers to avoid these common issues. BRCGS certification assists operations by requiring a level of safety and quality standards recognized across the globe, along the supply chain.

BRC Issue 9 Standards Overview

As with the previous issue of Standards, BRC Issue 9 has nine clauses, covering the nine core aspects of the Standard. Many of the updates in Issue 9 are negligible, having to do with editorial corrections or definitions, but there are some changes that manufacturers should take note of.

Issue 9 updates and revisions put a stronger emphasis on developing, nurturing, and maintaining an organization-wide awareness of and commitment to food safety as a cornerstone of the company culture.

In general, Issue 9 updates and revisions put a stronger emphasis on developing, nurturing, and maintaining an organization-wide awareness of and commitment to food safety as a cornerstone of the company culture. Rather than simply being a document to sign each year, culture is presented throughout the Standard as a fundamental commitment that permeates throughout the entire company.

Section 1.1.2 calls on senior management to create a clear plan that provides key components for the "development and continuing improvement" of this food safety and quality culture, and department managers are responsible for ensuring their departments are clear on this plan.

It has always been the goal of the BRC Standard to establish food safety and quality requirements that assist food manufacturers in providing the safest and highest quality products, while also addressing consumer concerns.

It is important to note, BRC audits conducted after February 1, 2023 will be held against the latest Standard: Issue 9.

1. Senior Management Commitment

"The site's senior management shall demonstrate that they are fully committed to the implementation of the requirements of the Global Standard Food Safety and to processes which facilitate continual improvement of food safety, quality management, and the site's food safety and quality culture."

Senior management is now required to be more active in food safety and quality culture, and staying updated based on employee feedback and reviews of measured results.

In Issue 9, the "Senior management commitment and continual improvement" section outlines more requirements for senior management than previously written. Senior management is now required to be more active in food safety and quality culture, and staying updated based on employee feedback and reviews of measured results.

Key differences between the issues 8 and 9:

1. Senior management will "establish, implement and maintain a culture of food safety and quality throughout the organization."
2. Issue 9 stresses the importance of communication and collaboration between senior management and other employees. Senior management must "communicate the importance of meeting food safety and quality objectives" and "collaborate with employees and other interested parties to enhance food safety and quality."
3. Senior management must ensure supplier management processes are in place, including a requirement to "conduct supplier risk assessments and implement appropriate controls."
4. Continuous improvement - requiring senior management to "continuously improve the effectiveness of the food safety and quality management system" - has been highlighted in Issue 9.

Compared to Issue 8, Issue 9 focuses highly on the importance of creating a food safety and quality culture, communication and collaboration, supplier management, and continuous improvement.

2. Food Safety Plan (HACCP)

"The company shall have a fully implemented and effective food safety plan incorporating the Codex Alimentarius HACCP principles."

The Food Safety Plan is a proactive strategy used to help ensure food quality and safety. As the nature of industry evolves, the need for flexibility, real-time data, and exceptional record-keeping will increase. Issue 8 outlines seven required components of a Food Safety Plan:

1. Hazard Analysis
2. Preventive Controls
3. Prerequisite Programs
4. Validation and Verification
5. Document Control
6. Record Keeping
7. Food Safety Culture

Issue 9 incorporates additional requirements focusing on risk management and continuous improvement, as well as food fraud.

Issue 9 incorporates additional requirements focusing on risk management and continuous improvement, as well as food fraud. For example, the HACCP hazard analysis must document risks from "intentional adulteration and food fraud." Additionally, the Food Safety Plan must include:

1. Considerations of the use of new technologies and innovations.
2. A documented process for validation of the control measures.
3. A documented process for verification of the effectiveness of the control measures.
4. A documented process for reviewing and updating the plan.
5. The identification of any supply chain vulnerabilities and documented controls to manage those risks.

3. Food Safety and Quality Management

"The company's processes and procedures to meet the requirements of this Standard shall be documented to allow effective, consistent application, facilitate training, and support due diligence in the production of a safe product."

This clause provides details on policies and procedures managers and organizations can build on to achieve the necessary requirements to be compliant with the Standard.

This clause provides details on policies and procedures managers and organizations can build on to achieve the necessary requirements to be compliant with the Standard. Previous issues outlined these to be:

1. A hazard and risk management system
2. Document control procedures
3. Corrective and preventive action procedures
4. Internal audit procedures
5. Management review procedures

Issue 9 of this clause includes these key differences:

1. An update that requires the site to have a documented quality management system integrated into the overall food safety management system.
2. Issue 9 now requires risk assessments be conducted for food safety and quality management, including identifying potential hazards and risks to food safety and quality, and taking steps to mitigate or control them.
3. Updates require organizations to have a documented risk assessment process for selecting and approving suppliers. Suppliers must be regularly monitored and reviewed for performance.
4. There are more detailed requirements for document control with this update. You must have a document control system in place, that ensures all food safety and quality management system documents are properly controlled and maintained.

4. Site Standards

"The production site shall be of suitable size, location and construction, and be maintained to reduce the risk of contamination and facilitate the production of safe and legal finished products."

The Site Standards clause outlines the requirements of the facility, equipment, personnel, and environment, to "prevent the risk of product contamination and to comply with relevant legislation."

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The requirements of the Site Standards clause in Issue 9 are:

1. Site security and access control
2. Cleaning and sanitation practices
3. Maintenance and repair of facilities and equipment
4. Management of waste and by-products
5. Management of utilities and services (e.g., water, air, steam, gas)
6. Pest control management
7. Management of foreign bodies
8. Monitoring and verification activities
9. Calibration and maintenance of measuring equipment
10. Management of allergens
11. Management of chemical and physical contaminants

Issue 9 introduces new requirements for risk assessments and managing the risks of physical and chemical contamination, as well as new cleaning and sanitation practices to avoid cross-contamination. It also has an added requirement for pest control.

5. Product Control

"Product design and development procedures shall be in place for new products or processes and any changes to product, packaging or manufacturing processes to ensure that safe and legal products are produced."

This clause requires manufacturers to have systems and procedures in place to control product safety, legality, and quality. There must be a clear understanding of the product characteristics, how to identify potential hazards, and the implementation of controls to mitigate those hazards.

The clause addresses the importance of traceability and requires product sampling and testing programs to confirm product safety and quality controls are effective.

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Issue 9 updates to the Product Control clause include the following requirements:

1. Procedures for managing product recalls and withdrawals.
2. Systems manage allergens and prevent cross-contamination.
3. A plan for product testing that accounts for the risks associated with the product and its supply chain.
4. Requirements for testing the effectiveness of traceability systems and for testing product traceability during mock recalls.

6. Process Control

"The site shall operate to process specifications and work instructions/ procedures that ensure the production of consistently safe and legal product with the desired quality characteristics, in full compliance with the HACCP or food safety plan."

The Process Control clause outlines requirements for effective controls to ensure the production of safe and high-quality food products.

The Process Control clause outlines requirements for effective controls to ensure the production of safe and high-quality food products. The key requirements for manufacturers in this clause include:

1. A defined process for designing and developing new products or altering existing ones, to ensure food safety and quality risks are identified and addressed.
2. Implementation and maintenance of controls to ensure that the manufacturing process can consistently produce safe and high-quality products, within the right specifications.
3. A system in place to monitor and measure process performances.
4. Procedures for identifying and addressing non-conformities (how to implement corrective actions and take preventive actions to avoid recurrence).
5. A system in place to identify and trace products through the production process to effectively facilitate product recall if necessary.
6. Regular process verification of the effectiveness of manufacturing process controls through internal audits and/or management reviews.

The Process Control in Issue 9 includes some changes that address the integrity, safety, and quality of products. Specifically:

1. A requirement for manufacturers to identify environmental hazards that may impact product safety and/or quality.
2. The requirement to implement and maintain a system for managing product changeovers.
3. The requirement for manufacturers to have procedures for managing the integrity of the product and packaging materials.
4. Implementation of a system to manage risks of foreign object contamination.

7. Personnel

"The company shall ensure that all personnel performing work that affects product safety, legality, and quality are demonstrably competent to carry out their activity through training, work experience or qualification."

The Personnel clause outlines the need for employees to be qualified and properly trained to proficiently perform their assigned duties.

The Personnel clause outlines what is expected of companies when it comes to personnel. Specifically, the need for employees to be qualified and properly trained to proficiently perform their assigned duties. This clause includes the following requirements:

- Personnel are required to be qualified to perform their duties effectively, properly, and safely.
- Job descriptions and responsibilities should be clearly defined so each employee is clear about their job roles and responsibilities.
- Proper training should be provided, so personnel understands and complies with food safety and quality requirements.
- Employees should understand the consequences of non-compliance and be encouraged to report any issues or concerns they have without fear of retaliation.
- Employees should be evaluated regularly to ensure ongoing compliance and competence.

While Issue 9 doesn't necessarily include any specific updates or changes, it does explicitly mention the need for a whistleblower policy that allows personnel to feel safe in reporting non-compliance issues or concerns.

8. Production Risk Zones

"The site shall be able to demonstrate that production facilities and controls are suitable to prevent pathogen contamination of products."

The Production Risk Zones clause addresses important requirements around the proper clothing, hygienic requirements, and segregation of areas, in high risk, high care, and ambient high care areas.

The Production Risk Zones clause outlines requirements for managing any risks around production areas. It addresses important requirements around the proper clothing, hygienic requirements, and segregation of areas, in high risk, high care, and ambient high care areas. The clause includes the following requirements:

1. Identification and control of potential contamination sources
2. Control of access to production areas
3. Adequate separation between high-risk and low-risk areas
4. Appropriate zoning and signage to indicate the level of risk
5. Regular cleaning and maintenance of production areas
6. Monitoring of environmental conditions, such as temperature and humidity.

9. Requirements for Trade Products

"The company shall operate procedures for approval of the last manufacturer or packer of food products to ensure that traded products are safe, legal and manufactured in accordance with any defined product specifications."

It applies to any "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 labeled at that site."

The final clause addresses requirements for food products intended for further processing before being sold to the consumer. It applies to any "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 labeled at that site."

For operations needing to be audited against this section, *all* traded food products and food raw materials must be included in the audit scope with no exclusions. While this is a voluntary module, sites that use these traded products or materials and choose to exclude them from the audit scope will have this exclusion included on their audit report.

The purpose of this clause is to ensure consistency in safety and quality standards as well as the authenticity of products brought into the site to be used. This clause focuses on:

1. A documented approval process for suppliers of trade products.
2. Approval of raw and packaging materials used in the production of trade products.
3. Risk assessment and management of potential hazards associated with trade products.
4. Implementation of appropriate quality control and monitoring procedures
5. Traceability of trade products throughout the supply chain. Tests of the traceability system should done annually to ensure traceability is "achievable within 4 hours (1 day when information is required from external parties).".
6. Appropriate storage and transportation of trade products.

BRC Audit Guide for Manufacturers: What to Expect

In general, the BRC audit consists of five key segments, each with specific protocols. These segments are outlined here as a general guide to a BRC audit, but your particular organization, certification goals, products, and more, can result in variations. That's why it is crucial for plant leaders to learn as much as they can about BRC requirements relevant to their operations.

Review the relevant regulations and guidelines, based on your operation.

Prior to beginning the audit process, it is imperative to visit the BRC website and download a copy of the BRC Food Safety Code Issue 9. Review the relevant regulations and guidelines, based on your operation. Once you feel confident in your knowledge and understanding of the requirements, you can begin your audit preparation.

Audit Preparation

Audit preparation has four steps. First, the type of audit program (programme) is determined by the BRC based on the type of certification your company is seeking and any additional modules you want to be audited for. There are three options available - Announced, Blended, and Unannounced.

- **Announced audit** programs have agreed-upon dates between the site and the certification body, to perform the audit.
- **Blended announced audit** programs combine remote audits to review documentation, various systems, and records, followed by an on-site audit that focuses on "production, storage, and other on-site areas." As of the publication of Issue 9, blended announced audits are not available for initial BRC certification audits.
- **Unannounced audits** are performed without notification and are presented as an option for manufacturers to demonstrate a high level of food safety and quality systems and processes. Companies opting for the unannounced audit for a first-time certification may need to wait as long as a year to get audited.

Self-assessment falls under the audit preparation segment, as well. This self-assessment should measure your operation's compliance with the Standard, and identify non-compliance issues that need to be corrected to meet the requirements.

Next, the certification body is determined, based on the type of certification you're seeking and the type of certification body accepted by your customers.

Finally, a contract is established between your company and the certification body "in accordance with ISO/IEC 17065," which provides details about the audit, reporting requirements, and other key information to define the scope of the audit.

Audit Planning

Before the audit, you'll need to provide the necessary documentation requested by the certification body to help ensure the auditor is fully prepared to perform the audit efficiently. The certification body will provide a detailed list of the information, data, or documentation they need to prepare for the audit, but you'll likely need at least:

- Company background and structure
- Summary of HACCP/Food Safety plan and CCPs
- Site plan
- Process flow diagram
- Description of process controls
- List of products/product groups included in audit scope
- Management organization flowchart
- Any special handling requirements
- Any outsourced processes
- Any recent quality or safety issues
- If this is a re-certification, the previous audit report and certificate.

The documentation should be provided in the requested format as soon as possible, to reduce the amount of time needed to perform the audit.

The audit date will be agreed upon between the site and the certification body for blended or announced audits. For unannounced audits, the certification body will notify you of the year the unannounced audit will take place, within three months of your previous audit.

The length of the audit will depend on the scope, but generally, an audit lasts eight to nine hours for up to three days.

Ensure the proper documentation and personnel are available for the audit, including senior management, for the dates of the audit. In the event some of the necessary personnel will be unavailable, an assigned deputy must be present.

The length of the audit will depend on the scope, but generally, an audit lasts eight to nine hours for up to three days (BRC offers an audit duration calculator on their website).

On-Site Audit

The on-site audit will have several stages, but you can expect almost half of the process to be spent on interviewing employees, observing processes, production, and site facilities, and reviewing documentation. The document reviews are used to verify key areas like:

- HACCP plan and CCP monitoring
- Label specifications, development processes, and legislation
- Quality management systems

You are expected to accommodate the auditor (or auditing team) throughout the auditing process.

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Opening Meeting

The opening meeting will be a discussion of the scope and process of the audit. It must be attended by senior managers (or their authorized deputies) and anyone with the authority to "ensure that corrective action can be progressed if non-conformities are found."

Production Facility Inspection

The auditor will review various systems within your facility to observe how they align with GMPs, how effective they are, and how accurately they are depicted in process flow diagrams. In general, this part of the audit is to verify the site is using good manufacturing practices that meet the Standard's food quality and safety requirements.

Document Review

The auditor will review your HACCP and quality management systems.

Vertical Audit

A review of any relevant records of the operation to gauge the effectiveness and efficiency of traceability. It will verify your traceability measures allow traceability to be achieved within four hours.

Final Review of Findings

The auditor will conduct a review of their findings to prepare for the closing meeting, including notes they've taken during the process that identify any non-conformities and the nature and level of severity for each one. These non-conformities will be discussed with the accompanying manager.

Closing Meeting

The closing meeting - which should be attended by senior management, as with the opening meeting - will involve a discussion of the auditor's findings, including any non-conformities identified during the audit process. While the auditor will not disclose the impact these non-conformities may or may not have on the audit results, they will discuss the process of closing out any non-conformities, including a time frame for the site to provide evidence of the corrections, to the auditor. A summary of non-conformities will be documented during this meeting or no more than one day after.

Non-conformities and Corrective Action

There are three severity levels of non-conformities and the auditor determines the level of any non-conformities found, based on their objective judgment of evidence and observations during the audit. These levels are:

- Critical
- Major
- Minor

To close out non-conformities, you are required to perform immediate corrective action, followed by a root cause analysis to determine the cause, and establish a preventive action plan. These must be submitted to the certification body within 28 days of the audit, and they will review them within 14 days of receipt.

If these documents are approved, you will receive an audit report with your grade and certificate within 42 days of the audit.

In some cases, critical non-conformities or too many non-conformities can lead to a withdrawal of the certification in which case, the site will need to be re-audited.

Post Audit

Once certification is awarded, you will need to keep communications open with your certification body and be sure to report any events or circumstances that may compromise your operation's BRC certification qualifications.

You will also be able to share audit reports with customers (and potential customers), as a way to build trust and showcase your food safety and quality commitment.

BRCGS certification is valuable for companies who want to demonstrate their commitment to the highest standards of food safety and quality. Your site will be listed among a publicly accessible database of certified sites. You will also be able to share audit reports with customers (and potential customers), as a way to build trust and showcase your food safety and quality commitment.

Continual improvement is a cornerstone of the Standard's food safety and quality goals and, as a BRC certified site, your facilities should always exhibit consistent effort to continually improve your operations and implement ways to grow your company's culture of food safety.

Best Practices for Preparing for a BRC Audit

There are specific steps plant managent can take to prepare for a BRC audit, but it is important to remember this guide on BRC audits for food manufacturers is just a starting point.

The BRC Global Standard Food Safety Issue 9 is a 180-page publication with variations and exceptions based on multiple factors including scope, products, modules, and more.

The BRC Global Standard Food Safety Issue 9 is a 180-page publication with variations and exceptions based on multiple factors including scope, products, modules, and more.

Further, different certifications (i.e. Food Safety, Storage and Materials, Packaging, etc.) will have different requirements and different grades have different auditing options.

Managers should study and learn the requirements for their particular company and product(s), and become familiar with the Standard and how it applies to your business. Once you feel confident in your understanding of the BRCGS Issue 9 requirements, you can begin to prepare for an audit.

Conduct a Pre-Audit

Conducting a pre-audit before the BRC audit helps identify potential non-conformities and allows for corrective actions to be taken preemptively. A pre-audit also helps ensure the site is ready for the audit, employees are properly trained, educated, and prepared, and all necessary documentation is in place.

Train Personnel

Be sure all personnel involved in the audit are trained and aware of the requirements of the BRC Standard. Since the audit will involve communication with employees across the plant, it is important that nobody is excluded from understanding the Standard and what it means. To this end, each employee - regardless of station or role - should be able to provide consistent responses to questions or clarifications asked by the auditor, during the audit process.

Maintain Documentation

Ensure that all required documentation is up-to-date, accurate, and readily available for review during the audit. This includes documentation on policies, procedures, specifications, and records.

Conduct Internal Audits

Regular internal audits help identify potential non-conformities and allow you to establish corrective actions and preventive plans before the audit. Regularly scheduled audits will help managers continually improve their operations, which is the goal of the BRCGS.

Address Non-Conformities

When any non-conformities are identified through audits or otherwise, take immediate corrective actions. Conduct RCAs to determine the cause and institute a preventive action to avoid recurrences. While the auditor will likely discuss recent non-conformities with you during the audit, it will be observed that the proper steps were taken to address them, prior to the audit. This shows the auditor your company's level of attention and commitment to compliance.

By following these best practices, you can prepare for - and successfully complete - a BRC audit, ensuring your operation is in compliance with the BRC Standard Issue 9, and meeting the expectations of your customers.

Tips for Maintaining BRC Certification Over Time

Getting a BRC certification has many benefits for food and beverage manufacturers and processors who are committed to making food safety and quality an intrinsic part of their organization. Manufacturers will be recognized globally for this commitment, which requires a great amount of effort, time, and investment. That's why it's important to retain your BRC certification once you have it.

Food Safety Culture

Continue to foster an organization-wide culture of food safety and quality, that encourages employees to take food safety seriously and feel comfortable reporting any concerns they have.

Internal Audits

Continue performing regular internal audits, which not only assist with continuous improvement but serve to reinforce the importance of food safety and quality to all employees. Compliance depends on constant monitoring and improvement to ensure your operation is performing up to Standard requirements and your products are of the highest standards.

Monitor Standards for Updates or Changes

The BRC will notify sites of changes and updates to the Standard, but it is up to you to stay informed about the requirements of remaining compliant. For example, if your plan invests in a new type of equipment, material, ingredient, or you switch suppliers, you are responsible for ensuring everything meets the requirements for BRC certification.

Continuous Improvement

Collect data and information to identify areas that could be improved. This includes feedback from customers and employees which can provide valuable insights into how your operation can be improved. Assess the programs you've put in place to nurture and grow the culture of food safety, and determine which parts work best, and which could use improvement.

Use your internal audit reports to find important areas to focus on when improving your operation, and hold regular meetings with senior management to keep them informed and involved in the continuous improvement achievements of the company.

Be Prepared for Future Audits

Continue communicating with your certification body and always strive to keep your facility operating at the optimal level. This ensures - even in the event of an unannounced audit - you are already prepared because you are already operating at (or above) BRC Global Standards.

Conclusion

Manufacturing facilities seeking BRC certification will need to put in a lot of time, research, and effort to effectively communicate the requirements for - and value of - BRCGS and the full scope of what it will involve.

Senior management will need to be fully invested in the process because they are an integral part of getting BRC certification, according to Issue 9. Everyone within the company will need to be educated on BRC Standards, food safety and quality, food safety culture, the process of getting certified, and the importance of being prepared and compliant.

Everyone within the company will need to be educated on BRC Standards, food safety and quality, food safety culture, the process of getting certified, and the importance of being prepared and compliant.

Sites that receive BRC certification are recognized as having a particularly high standard of food quality and safety, providing access to new markets globally.

An increasing amount of retailers and other customers are requiring BRC certification from suppliers and the standard can also help companies remain vigilant and focused on continuous improvement, which naturally reduces risks of food safety incidents.

Tools that enable digital records, automated processes, and quick access to real time and historical data will expedite and ensure BRCGS certification.

About SafetyChain

SafetyChain gives over 2000 process manufacturers the flexibility to rapidly address urgent challenges while offering scalability to expand and drive long-term value.

Capture All Critical Data	• Gain real-time visibility into what is happening throughout the facility • Eliminate organizational silos made worse by competing data sources • Feel confident your teams are relying on consistently accurate data
Gain Plant-Wide Insight	• Know at-a-glance whether you're hitting your metrics • Pinpoint areas of improvement to reduce waste, increase yield, and maximize throughput • Better understand how your teams are performing to create labor efficiencies
Take Rapid Action	• Save time and ensure you're always audit-ready • Eliminate guesswork so everyone knows what they need to do and when • Increase efficiency and foster a culture of problem-solving
Plan Scalable Growth	• Drive change, not disruption, throughout your plants • Ensure the short-term and long-term success of your implementation • Justify current and future technology investments by reducing waste and increasing productivity

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