

GFSI Assessment Report



Application information

Assessment team and date

Certification programme / Standard* Name(s)	BRCGS Food Issue 8 BRCGS Agents and Broker Issue 2 BRCGS Storage and Distribution Issue 4 BRCGS Packaging Materials Issue 6
Certification programme / Standard* owner name and address	BRCGS Floor 2, 7 Harp Lane London EC3R 6DP United Kingdom
Certification programme / Standard* owner name, email, contact number	BRCGS Chief Executive Office: Mark Proctor Email: enquiries@brcgs.com Contact: +44 (0)20 3931 8150
Benchmark Leader name and contact details	Stephanie Lemaitre s.lemaitre.sle@gmail.com
GFSI Technical Manager name	Marie-Claude Quentin
Observers name	Elisa Carlucci
Interpreter's name (if applicable)	N/ A
Date of this office assessment	28 th and 29 th Januray 2021
Language (e.g. English or other)	English

* Cross as appropriate

Scopes including in this application

GFSI Scopes		Scopes applied For
AI	Farming of Animals for Meat/ Milk/ Eggs/ Honey	
AII	Farming of Fish and Seafood	
BI	Farming of Plants (other than grains and pulses)	
BII	Farming of Grains and Pulses	
BIII	Pre-process Handling of plant products	X
CO	Animal Conversion	X
CI	Processing of perishable animal products	X
CII	Processing of Plant Perishable Products	X
CIII	Processing of Animal and Plant Perishable Products (Mixed Products)	X
CIV	Processing of Ambient Stable Products	X
D	Production of Feed	
E	Catering	

FI	Retail / Wholesale	
FII	Food Broker / Agent	X
H	Provision of Food Safety Services	
G	Provision of Storage and Distribution Services	X
I	Production of Food Packaging	X
JI	Hygienic Design of Food Buildings and Processing Equipment (for building constructors and equipment manufacturers)	
JII	Hygienic Design of Food Buildings and Processing Equipment (for building and equipment users)	
K	Production of (Bio) Chemicals (Additives, Vitamins, Minerals, Bio-cultures, Flavourings, Enzymes and Processing aids)	X

EXECUTIVE SUMMARY AND RECOMMENDATION TO THE BOARD

Executive summary

The GFSI assessment was conducted to evaluate the following BRCGS Certification Programmes:

- BRCGS Food Issue 8
- BRCGS Agents and Broker Issue 2
- BRCGS Storage and Distribution Issue 4
- BRCGS Packaging Materials Issue 6

for compliance against GFSI Benchmarking Requirements version 2020.1.

All these Certification Programmes had been previously benchmarked under the same Issue number against GFSI Benchmarking Requirements version 7.2, except for BRCGS Storage and Distribution which was benchmarked for its Issue 3.

The assessment was made up of a preliminary desktop review, completed remotely in December 2020 by the Benchmark Leader, under the supervision of the GFSI Technical Manager. This review was based on the evidence provided by BRCGS in the self-assessment Excel files for GFSI Part II and Parts III to cover the applied scopes of recognition.

All findings raised concerning the request of additional information were discussed and clarified during a “call to go through findings” on 6th January 2021.

No critical findings were raised at this step and the office assessment was scheduled and performed remotely on 28th and 29th January 2021.

Objectives of the office assessment were to check the implementation of the requirements through a review of procedures, database elements and a sample of records.

Findings were identified during the office assessment and were agreed by the three parties (BRCGS, Benchmark Leader and GFSI Technical Manager). Findings are described in the below “List of findings” table.

A corrective action plan was provided in due time and all corrective actions proposed are acceptable by both the Benchmark Leader and the GFSI Technical Manager.

As BRCGS Food Issue 8, BRCGS Agents and Broker Issue 2 and BRCGS Packaging Materials Issue 6 had been previously benchmarked, it was possible to check accredited certificates. For BRCGS Storage and Distribution Issue 4, publication took place in November 2020, for a mandatory implementation on 1st May 2021. Although it was not possible to have any accredited certificates at the time the office assessment occurred for this Certification Programme, it was agreed to move forward in the benchmarking process. As a result, for the GFSI scope of recognition G, the final benchmarking process outcome will be conditioned by the release of 10 accredited certificates.

Result of the public consultation

(To be completed after public consultation).

Recommendation to the GFSI Board

(To be completed after public consultation).

RESULTS OF ASSESSMENT AND OFFICE VISIT

Time and location details

	Location	People present GFSI, consultant, CPO. Names and roles	Date and time
Self-assessment desktop review	Remote assessment	Stephanie Lemaitre	December 2020, 3 days
Review call	Remote call	<p>For GFSI: Stephanie Lemaitre Marie-Claude Quentin Elisa Carlucci</p> <p>For BRCGS: Karen Betts, Head of Compliance John Figgins, Senior Technical Manager Grace Abamba, Global Technical Manager (Consumer Products and Packaging) Richa Bedi Navik, Senior Global Standards Manager Seema Patel, Standard Technical writer Ritu Bajaj, Compliance Audit Manager</p>	6 th January 2021, 0.5 day
Office visit	Remote office visit	<p>For GFSI: Stephanie Lemaitre Marie-Claude Quentin Elisa Carlucci</p> <p>For BRCGS: John Kukoly, Director of Certification Program Angela O' Donovan, Head of Standards Karen Betts, Head of Compliance John Figgins, Senior Technical Manager Grace Abamba, Global Technical Manager (Consumer Products and Packaging) Richa Bedi Navik, Senior Global Standards Manager Seema Patel, Standard Technical writer Anna Malek Woznica, Compliance Technical Manager Ritu Bajaj, Compliance Audit Manager</p>	28 th and 29 th January 2021, 1 day

Overview

BRC Trading Ltd is a Certification Programme Owner providing a range of standards (BRC Global Standards) for brand and consumer protection. The aim of BRC Global standards is to guarantee the standardisation of quality, safety and operational criteria and to ensure that manufacturers fulfil their legal obligations and provide protection for the end consumer.

BRC Trading (BRCT) was formed in 2003 to provide services to support the British Retail Consortium. In 2016, BRC ownership was transferred from a sole subsidiary of the British Retail Consortium, and ownership is now comprised of British Retail Consortium, BRCT Board and LGC Group, with the latter as the majority shareholder. In 2019, a rebranding has been carried out and the BRC acronym changed to Brand Reputation through Compliance.

The BRCGS standard certifications are used by over 29,000 organisations worldwide, with certifications issued through a global network of over 74 licensed Certification Bodies, who are accredited by 14 Accreditation Bodies.

The BRCGS standards subject to the GFSI benchmarking process covers the following GFSI scopes:

GFSI scope	BRCGS Certification Programme
BIII	BRCGS Food Issue 8 (August 2018)
C0	BRCGS Food Issue 8 (August 2018)
CI to CIV	BRCGS Food Issue 8 (August 2018)
FII	BRCGS Agents and Brokers Issue 2 (August 2017)
G	BRCGS Storage and Distribution Issue 4 (November 2020)
I	BRCGS Packaging Materials Issue 6 (August 2019)
K	BRCGS Food Issue 8 (August 2018)

BRCGS Standards are also supplemented by Position Statements, which shall be implemented and supersedes any details published within the different Standards. The Position Statements are available on BRCGS website; they are dynamic and may be adjusted when deemed necessary.

All the above-mentioned Certification Programmes had been previously benchmarked under the same Issue number against GFSI Benchmarking Requirements version 7.2, except for BRCGS Storage and Distribution which was benchmarked for its Issue 3. To allow compliance of these Certification Programmes against GFSI Benchmarking Requirements version 2020.1, a number of Position statements have been issued:

- BRCGS Agents and Brokers, version 4: changes performed in November 2020 (e.g., to include food safety culture)
- BRCGS Food, F837, version 3: changes performed in March 2020 (e.g., to update requirement on environmental monitoring programme)
- BRCGS Packaging Materials, P617, version 2: changed performed in November 2020 and January 2021 (e.g., to update requirements on allergen management)
- General, BRCGS 079: Position Statement and Protocol on Unannounced Audits (e.g., to require a mandatory unannounced audit every 3 years).

BRCGS Storage and Distribution Issue 4 was not yet benchmarked. Main changes compared to Issue 3 have focused on:

- Including food safety culture
- Increasing emphasis on continuous improvements
- Reflecting the changing role of the logistics sector
- Requiring a mandatory unannounced audit at least once every 3 years
- Offering the possibility to perform blended audits.

General compliance, strengths and weaknesses

Following the office assessment, 3 findings (grouped in 1) were identified on GFSI Part III requirements and 8 (of which 2 grouped in 1) on Part II requirements. Findings were related to the following main area:

- Compliance with GFSI scope C0 (Animal primary conversion): three specific GFSI key elements were not addressed in BRCGS Food Standard but interpretation was provided in Red Meat Guidelines. To allow compliance with GFSI requirements, BRCGS has moved the requirements from the Guidelines to a Position Statement, to make the implementation of these requirements mandatory.
- Internal review: although BRCGS performs many reviews and follow up meetings at different levels of their organisations, no formal internal review of overall relevance and compliance of all Certification Programmes was performed. BRCGS has provided a relevant corrective action to comply with this GFSI key element.
- Relationship with Accreditation Bodies: although BRCGS has a well-established working relationship with Accreditation Bodies and closely works with their home AB (UKAS), no request to get a signed agreement with all Accreditation Bodies was performed since 2017 (with only 3/14 Accreditation Bodies who signed the agreement). BRCGS has provided evidence of new request and the implementation will be assessed during the next monitoring visit.
- Documentation enforcement: some requirements were addressed in “Guidelines”, where it was not formally written that the implementation of these guidelines was mandatory, with the risk not being fulfilled. BRCGS has updated the relevant documents to clarify their intent (mandatory implementation).

The main strengths of the Programme are:

- Long experience and expertise in the management and development of certification programmes for different steps of the supply chain
- Robust auditor database
- Detailed QMS
- Very detailed Integrity Programme, including extensive report reviews, witness audits, Certification body offices and monitoring of KPIs; with many risk-based criteria to define amount and location of Integrity actions.

A corrective action plan was provided in due time and all corrective actions proposed are acceptable by both the Benchmark Leader and the GFSI Technical Manager.

For BRCGS Storage and Distribution Issue 4, publication took place in November 2020, for a mandatory implementation on 1st May 2021. Although it was not possible to have any accredited certificates at the time the office assessment occurred for this Certification Programme, GFSI Technical committee provided a dispensation for all Certification Programme Owners, agreeing to move forward in the benchmarking process. As a result, for the GFSI scope of recognition G, the final benchmarking process outcome will be conditioned by the release of 10 accredited certificates.

For the other scopes of recognition, the usual benchmarking process can be implemented.

Changes made to the certification programme / Standard* following the GFSI assessment

Following the office assessment, 3 findings were identified on GFSI Part III requirements, especially for GFSI scope C0 (Animal primary conversion).

BRCGS Food Issue 8 didn't address three specific GFSI key elements (FSM 13.4, FSM 14.3 and GMP 4.6) but interpretation was provided in Red Meat Guidelines.

To allow compliance with GFSI requirements, BRCGS has created a new Position Statement which makes the implementation of these requirements mandatory for companies involved in Animal Primary conversion.

BRC requirements on auditor competencies are addressed either in BRCGS Standards, either in other documents named "Guidelines". To ensure mandatory implementation of these documents, BRC has included the following statement in each of them: "These requirements shall be implemented and supersedes any details published within the Standard).

List of findings

Element reference	Non-conformity	Partly / no	Corrective action	Recommendation from Benchmark leader	Decision from GFSI technical manager
Part III, scope C0 FSM 13.4, FSM 14.3 and GMP 4.6	GFSI has confirmed in the new version 2020.1 to maintain a specific scope C0 for animal conversion (and not to include it in the other C scopes such as in the ISO/TS22003), which includes specific elements. This specific GFSI C0 key element is not addressed in the BRCGS Food standard but in the Meat Guidelines. These Guidelines are available on purchase on BRC website and are not for mandatory use. As a result, the mandatory implementation of this key element is not covered.	Partly	These specific requirements will be outlined in a Position Statement, a method used for changes to normative documents. A draft has been circulated and will be discussed at the next Food TAC meeting. BRCGS will consider the format of specific product requirements in forthcoming Standard reviews.	OK with the Position statement content - Date of publication and implementation to be confirmed.	CAP accepted and implementation to be confirmed
Part II 1.23	Each department is not assessed through an overall annual review meeting, but through different meetings, for specific topics (e.g. TAC meetings, Advisory Board meetings, Technical and compliance team monthly update). A template of Senior Leadership meeting report is being developed for this activity, but not currently	Partly	A formal 'Annual Management Review' process will be developed with an agenda covering the internal processes critical to the success of the certification programmes. A meeting will be convened in the next few months. Minutes and action points shall be documented and appropriately actioned.	OK with the procedure. April meeting report will be assessed during the next monitoring office visit.	CAP accepted and implementation will be checked at next office visit

	implemented. Although BRCGS activities are reviewed through different committees, there isn't any formal annual internal review of operations.				
Part II 1.24 and 1.25	As there isn't any formal annual internal review, this topic couldn't be checked for compliance.	Partly	A formal 'Annual Management Review' process will be developed with an agenda covering the internal processes critical to the success of the certification programmes. A meeting will be convened in the next few months. Minutes and action points shall be documented and appropriately actioned.	OK with the procedure. April meeting report will be assessed during the next monitoring office visit.	CAP accepted and implementation will be checked at next office visit
Part II 2.4 and 2.6	BRCGS asked in 2017 all ABs to acknowledge receipt of a letter asking for a commitment on mutual communication process. Only 3/ 14 ABs signed the letter. BRCGS applied to IAF in October 2020 but didn't get any reply on application status. Since 2017, no further request has been made to ABs to get a signed agreement.	Partly	Although BRCGS has a well established working relationship with ABs and believes any formal documentation is unlikely to be formally signed, BRCGS will communicate again to Abs the GFSI requirements. We will take this opportunity to reiterate some of the details of our working partnership. A Letter has been sent to ABs and we wait for the formal receipt.	OK with the communication. The status of returned and signed agreements will be assessed during the next monitoring visit.	CAP accepted and implementation will be checked at next office visit
Part II 2.8	BRCGS is sharing information with ABs through Annual AB conference and BRCGS Technical bulletins (sent 3 times per year). Technical bulletins are sent to a defined mailing list, but the current mailing list of ABs is not exhaustive.	Partly	AS BRCGS outlined, not all Abs had been incorporated in our communication list held on CRM. This was corrected on the day of audit. The system has recently been changed to an 'opt in' process - so it will be investigated as to the reasons for the failure, however on an ongoing basis BRCGS will incorporate an 'audit' process to ensure key	OK	CAP accepted and implemented

			staholders are reiving such key communications.		
Part II 4.8	<p>- OK for Storage and Distribution, Food and Packaging Standards (5 years)</p> <p>- For Agents and Brokers, this requirement is not addressed in the standard but in a document named "Guidelines". As it is not formally written that the implementation of these guidelines is mandatory for certification bodies, there is a risk that these are not fulfilled.</p>	Partly	<p>The system of more detailed guidance for Cbs has been in place for sometime and stakeholders such as CBs and Abs are very clear that these form part of the normative documents that shall be implemented. AB208 guidelines on satisfying auditor competence for Agents and Brokers does include the statement 'This guidance shall be implemented and supersedes any details published within the Standard' . However we do agree that we could review the use of 'guidance' terminology throughtout our documentation and will change in future as necessary. We will ensure that normative documents are clearly stated as such.</p> <p>The umbrella document BRCGS 018 and also the Standard specific auditor competence documents have been reworded and published.</p>	OK	CAP accepted and implemented
Part II 4.11	<p>These requirements are addressed in a document named "Guidelines". As it is not formally written that the implementation of these guidelines is mandatory for certification bodies, there is a risk that these are not fulfilled.</p>	Partly	<p>The system of more detailed guidance for Cbs has been in place for sometime and stakeholders such as CBs and Abs are very clear that these form part of the normative documents that shall be implemented. AB208 guidelines on satisfying auditor competence for Agents and Brokers does include the statement 'This guidance shall be implemented and supersedes any details published within the Standard' . However we</p>	OK	CAP accepted and implemented

			<p>do agree that we could review the use of 'guidance' terminology throughout our documentation and will change in future as necessary. We will ensure that normative documents are clearly stated as such.</p> <p>The umbrella document BRCGS 018 and also the Standard specific auditor competence documents have been reworded and published.</p>		
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RESULTS OF THE PUBLIC STAKEHOLDER CONSULTATION

List of findings – public stakeholder consultation

			Answer	Recommendation from Benchmark leader	Decision from GFSI technical manager