Scope FII: broker
Summary of findings

Name of Certification Programme: BRCGS Agents and Brokers Issue 3

Section	yes	partly	no	empty
1	4	0	0	0
2	31	0	0	0
total	35	0	0	0

element number	element name	requirement	Compliant Yes/no	Benchmark leader's comment

Section 1 - Hazards and Risk Management System Requirements

Name of Certification Programme: BRCGS Agents and Brokers Issue 3

GFSI Benchmarking Requirements version 2020			CPO self assessment			Benchmark leader assessment	
element number	element name	requirement	Compliant Yes/No	supportive evidence reference	supportive evidence description	Compliant Yes/no	Benchmark leader's comment
HACCP 1.1.4	Hazard and Risk management system	A hazard and risk management system shall be implemented to identify and control food safety hazards, including allergens. This system shall be systematic, comprehensive and shall take into consideration relevant law.	yes	Section 1 SOI Section 2 Statement of Intent and clauses 2.6 and 2.7	Section 2: Statement of intent states- The company shall operate a product safety plan for the processes for which it is responsible. This shall be based on the principles of hazard and risk analysis including the Codex Alimentarius HACCP principles. The plan shall be documented, systematic, comprehensive, fully implemented and maintained. Clause 2.6 states- The company shall identify and record all potential hazards associated with each step of the product flow. The company shall include consideration of the following types of hazard: • microbiological growth (e.g. resulting from temperature abuse of products that require temperature control, or exposure of unpacked products to environmental micro-organisms such as pathogens) • physical contamination (e.g. glass contamination, wood splinters from pallets, dust or pests) • chemical or radiological contamination (including product tainting) • physical damage (e.g. breakage, puncturing of packaging, water damage or electrical faults) • fraud (e.g. substitution or deliberate/intentional adulteration) • malicious contamination of products • allergens (e.g. cross-contamination during storage or transportation of open product in silos or tankers) • hazards impacting the functional integrity of packaging materials and their performance • any other **hazards mandated by the customer or relevant regulatory authorities**. Clause 2.7- The company shall complete a documented risk analysis of the potential hazards in order to identify which need to be controlled. The following should be considered: • the likely occurrence of the hazard • the severity of the hazard (e.g. injurious to health, potential to cause food poisoning, rejection or a product recall) • existing prerequisite programmes that effectively prevent the hazard or reduce it to acceptable limits. Section 1: Statement of intent states- The company's senior management shall demonstrate that they are fully committed to the implementation of the requirements of the Standard and to the operation of processes that facilitate product authenticity and legality, and the continual improvement of their product safety and quality management services.	yes	
HACCP 1.2	Hazard and Risk management system	The scope of the Hazard and Risk Management System shall be defined per product / product category and / or per process or production step.	yes	Clause 2.4	The company shall define the scope of the hazard and risk analysis in terms of the products and services that are included. This shall include: • a description of the nature of products traded (e.g. canned fish, fresh produce, corrugated board, household chemicals such as bleach, cosmetics or household electric goods) • details of any particular specified storage or handling conditions (e.g. temperature control requirements or propensity to water damage) • a description of any services provided directly or arranged while the product is the responsibility of the company.	Yes	
HACCP 1.3	Hazard and Risk management system	The Hazard and Risk Management System shall be applicable to the site's scope of certification.	yes	Section 2 Statement of Intent	Section 2: Statement of intent states- The company shall operate a product safety plan for the processes for which it is responsible. This shall be based on the principles of hazard and risk analysis, including the Codex Alimentarius HACCP principles. The plan shall be documented, systematic, comprehensive, fully implemented and maintained.	Yes	
HACCP 1.4	Hazard and Risk management system	The Hazard and Risk Management System shall be reviewed regularly, and in case of any change that impacts food safety.	yes	Clause 2.11	The hazard and risk analysis shall be formally reviewed at least annually and whenever: • new product types are traded (i.e. products with different characteristics from those included within the original study) • new services or process steps are introduced • a new risk emerges • following a product recall, where the agent's or broker's processes are implicated. Changes resulting from the review shall be incorporated into the hazard and risk assessment and product safety and quality management systems. Where appropriate, the changes shall also be reflected in the company's product safety policy and product safety objectives.	Yes	

Section 2 - Food Safety Management System Requirements

Name of Certification Programme: BRCGS Agents and Brokers Issue 3

GFSI Benchmarking Requirements version 2020			CPO self assessment			Benchmark leader assessment	
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FSM 1	Management responsibility	A clear organisational structure identifying the job functions and responsibilities of at least those employees whose activities affect food safety shall be established, implemented and maintained.	yes	Section 1.2- Statement of intent 1.2.1	The company shall have a clear organisational structure and lines of communication to enable the effective management of services ensuring product safety, authenticuty, legality and quality.	Yes	
FSM 2	Management commitment and food safety culture	Evidence of the senior management's commitment to establish, implement, maintain and continuously improve the Food Safety Management System shall be provided. This shall include elements of food safety culture, at a minimum consisting of: communication, training, feedback from employees and performance measurement on food safety related activities.	yes	Section 1 - Statement of Intent Clause 1.1.2	Section 1 Statement of Intent states- The company's senior management shall demonstate that they are fully committed to the implementation of the requirements of the Standard and to the operation of processes that facilitate product authenticity and legality, and the continual improvement of their product safety and quality management services. Clause 1.1.2- The site's senior management shall define and maintain a clear plan for the development and continuing improvement of a product safety and quality culture within the company. This shall include: •defined activities involving all sections of the company that have an impact on product safety and quality. As a minimum, these activities shall be designed around: •communication within the supply chain and within the company •training •feedback from employees •performance measurement on product safety and quality related activities •an action plan indicating how the activities will be undertaken and measured, and the intended timescales •a review of the effectiveness of completed activities.	Yes	
FSM 3	Management review	The senior management shall review all elements of the Food Safety Management System, including the Hazard and Risk Management System HACCP plan or HACCP-based plans regularly, and in case of any change that impacts food safety, to ensure their continuing suitability and effectiveness.	yes	Clause 1.1.4	Management review meetings, attended by the company's senior management, shall be undertaken at appropriate planned intervals, as a minimum annually, to review the company's performance against the Standard and the objectives set in clause 1.1.3. The review process shall include the evaluation of: • the previous management review action plans and timescales • the results of internal, second-party and/or third-party audits • any customer complaints and the results of any customer performance reviews • any incidents, corrective actions, out-of-specification results and non-conforming materials • supplier performance • the management of the systems for hazard and risk assessment (e.g. product safety system, HACCP or HACCP-based plan), food defence or product security, and authenticity of products • resource requirements. Records of the meeting shall be kept and documentation shall be used to revise the objectives, thereby encouraging continuous improvement. The decisions and actions agreed within the review process shall be effectively communicated to the appropriate staff, and actions implemented within the agreed timescales.	Yes	

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FSM 4.2	Food safety legislation	Procedures shall be established, implemented and maintained to ensure that suppliers' activities and food comply with applicable legislation (in both countries of production and intended sale).	yes	Section 4.5 Statement of Intent- Product Legality and labelling Other references include: Clause 1.1.5 and 1.1.6 Clause 2.6 Clause 4.1.1	Section 4.5 Statement of Intent states- The company shall have processes in place to ensure that the products traded comply with the legal requirements in country of manufacture and the country of sale, where known. Clause 1.1.5: The company shall have a demonstrable system to ensure that significant product safety, authenticity, legality and specified quality issues are brought to the attention of senior management to allow those issues requiring immediate action to be resolved. 1.1.6- The company's senior management shall provide the resources required to ensure the product safety, legality and specified quality of products supplied in compliance with the requirements of this Standard and its customers. Clause 2.6: The company shall identify and record all potential hazards associated with each step of the product flow. The company shall include consideration of the following types of hazard: • microbiological growth (e.g. resulting from temperature abuse of products that require temperature control, or exposure of unpacked products to environmental micro-organisms such as pathogens) • physical contamination (e.g. glass contamination, wood splinters from pallets, dust or pests) • chemical or radiological contamination (including product tainting) • physical damage (e.g. breakage, puncturing of packaging, water damage or electrical faults) • fraud (e.g. substitution or deliberate/intentional adulteration) • malicious contamination of products • allergens (e.g. cross-contamination during storage or transportation of open product in silos or tankers) • hazards impacting the functional integrity of packaging materials and their performance • any other hazards mandated by the customer or relevant regulatory authorities. Clause 4.1.1: The company shall have a documented supplier approval procedure that identifies the process for initial and ongoing approval of suppliers and the manufacturer/processor/packer of each product traded. The requirements shall be based on the results of a risk assessment. This risk assessment shall include consideration of: • the nature of each product and its associated risks • customer-specific requirements • legislative requirements in the country of sale or importation of the product • source or country of origin • potential for adulteration or fraud • the brand identity of products (i.e. whether it is the customer's own brand or a branded product).	Yes	
FSM 5	Food Safety Management system	The elements of the Food Safety Management System shall be established, implemented, maintained and continuously improved and shall have a scope appropriate to the range of business activities to be covered.	yes	Section 1- Statement of intent covers continual improvement Section 3.1 and clause 3.1.2	The company's senior management shall demonstrate that they are fully committed to the implementation of the requirements of the Standard and to the operation of processes that facilitate continual improvement of their product safety and quality management processes. Section 3.1- Statement of Intent: The company's processes and procedures to meet the requirements of this Standard shall be documented to allow their consistent application, to facilitate training, and to support due diligence and the supply of a safe product. Clause 3.1.2: The product safety and quality manual shall be fully implemented, and the manual, or the relevant components of it, shall be readily available to relevant staff.	Yes	
FSM 6	Food safety policy and objectives	A clear, concise and documented food safety policy statement shall be in place, as well as measurable objectives specifying the extent of the organisation's commitment to meet the food safety needs.	yes	Clause 1.1.1 and Clause 1.1.3	Clause 1.1.1- The company shall have a documented policy that states the company's intention to meet its obligation to supply safe and legal products to the specified quality, and its responsibility to its customers. This shall be: • signed by the person with overall responsibility for the company • communicated to all staff. Clause 1.1.3- The company's senior maangement shall ensure that clear objectives are defined to maintain and improve services, ensuring product safety, authenticity and legality and quality in accordance with the quality policy and the requirements of this Standard. These obejectives shall be: • documented and include targets or clear measures of success • clearly communicated to relevant staff • monitored, and the results reported at least six-monthly to the company's senior management.	Yes	

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FSM 7.1	Food defence	A food defence threat assessment procedure shall be established, implemented and maintained to identify potential threats and prioritise food defence measures.	yes	Section 4.3 especially clause 4.3.1	Statement of Intent 4.3: Security systems shall be in place to protect products from theft, substitution or malicious contamination or damage while they are under the management control of the agent or broker. Clause 4.3.1: The company shall assess the potential risks to the security of the products from any attempt to steal, contaminate, substitute or damage the products during subcontracted transportation and storage by the service providers appointed by the company. Security measures identified by the risk assessment shall be documented and form part of the contract or terms and conditions for the subcontracted suppliers that have access to the product.	Yes	
FSM 7.1.1	Food defence	The agent / broker shall ensure that their suppliers have established, implemented and maintained a food defence threat assessment procedure to identify potential threats and prioritise food defence measures.	yes	Clause 4.1.2	The process for the initial and ongoing approval of manufacturers of products shall be based on risk. It shall include one or a combination of the following: • Valid certification of the manufacturing or packing site to the applicable BRCGS Standard or a standard benchmarked by the Global Food Safety Initiative (GFSI). The scope of the certification shall include the products traded by the agent or broker. • A supplier audit with a scope to include product safety, traceability testing, HACCP or hazard and risk management review, the product security (food defence) plan, the product authenticity plan, and good manufacturing practices. The audit shall include confirmation that these plans form part of the supplier's product safety management system and that any resultant actions are implemented. The supplier audit shall be undertaken by an experienced and demonstrably competent product safety auditor. Where it is completed by a second or third party, the company shall be able to: • demonstrate the competency of the auditor • confirm that the scope of the audit includes product safety, traceability, HACCP or hazard and risk management review, the product security (food defence) plan, the product authenticity plan, and good manufacturing practices • obtain and review a copy of the full audit report. For products (food or non-food) assessed as low-risk only, and where a valid risk-based justification is provided, initial and ongoing approval may be based on a completed manufacturing site questionnaire. As a minimum, the questionnaire shall demonstrate that the supplier has effective action plans to control product safety, product security (food defence) and product authenticity. The questionnaire shall be reviewed and verified by a demonstrably competent person.	Yes	
FSM 7.2.1	Food defence	The agent / broker shall ensure that their suppliers have a documented food defence plan in place specifying the measures implemented to mitigate the public health risks from any identified food defence threats.	yes	Clause 4.1.2	The process for the initial and ongoing approval of manufacturers of products shall be based on risk. It shall include one or a combination of the following: • Valid certification of the manufacturing or packing site to the applicable BRCGS Standard or a standard benchmarked by the Global Food Safety Initiative (GFSI). The scope of the certification shall include the products traded by the agent or broker. • A supplier audit with a scope to include product safety, traceability testing, HACCP or hazard and risk management review, the product security (food defence) plan, the product authenticity plan, and good manufacturing practices. The audit shall include confirmation that these plans form part of the supplier's product safety management system and that any resultant actions are implemented. The supplier audit shall be undertaken by an experienced and demonstrably competent product safety auditor. Where it is completed by a second or third party, the company shall be able to: • demonstrate the competency of the auditor • confirm that the scope of the audit includes product safety, traceability, HACCP or hazard and risk management review, the product security (food defence) plan, the product authenticity plan, and good manufacturing practices • obtain and review a copy of the full audit report. For products (food or non-food) assessed as low-risk only, and where a valid risk-based justification is provided, initial and ongoing approval may be based on a completed manufacturing site questionnaire. As a minimum, the questionnaire shall demonstrate that the supplier has effective action plans to control product safety, product security (food defence) and product authenticity. The questionnaire shall be reviewed and verified by a demonstrably competent person.	Yes	

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FSM 7.3.1	Food defence	The agent / broker shall ensure that their suppliers' food defence plan is supported by the suppliers' Food Safety Management System.	yes	Clause 4.1.2	The process for the initial and ongoing approval of manufacturers of products shall be based on risk. It shall include one or a combination of the following: • Valid certification of the manufacturing or packing site to the applicable BRCGS Standard or a standard benchmarked by the Global Food Safety Initiative (GFSI). The scope of the certification shall include the products traded by the agent or broker. • A supplier audit with a scope to include product safety, traceability testing, HACCP or hazard and risk management review, the product security (food defence) plan, the product authenticity plan, and good manufacturing practices. The audit shall include confirmation that these plans form part of the supplier's product safety management system and that any resultant actions are implemented. The supplier audit shall be undertaken by an experienced and demonstrably competent product safety auditor. Where it is completed by a second or third party, the company shall be able to: • demonstrate the competency of the auditor • confirm that the scope of the audit includes product safety, traceability, HACCP or hazard and risk management review, the product security (food defence) plan, the product authenticity plan, and good manufacturing practices • obtain and review a copy of the full audit report. For products (food or non-food) assessed as low-risk only, and where a valid risk-based justification is provided, initial and ongoing approval may be based on a completed manufacturing site questionnaire. As a minimum, the questionnaire shall demonstrate that the supplier has effective action plans to control product safety, product security (food defence) and product authenticity. The questionnaire shall be reviewed and verified by a demonstrably competent person.	Yes	
FSM 8.2	Food fraud	A documented food fraud plan shall be in place specifying the measures implemented to mitigate the public health risks from the identified food fraud vulnerabilities.	yes	Section 4.8 Also Clause 4.1.1- Supplier approval	Section 4.8 Statement of Intent: Systems shall be in place to minimise the risk of trading fraudulent or adulterated products and to ensure that all product descriptions are legal, accurate and verified.	Yes	
FSM 8.3	Food fraud	This food fraud mitigation plan shall be supported by the organisation's Food Safety Management System.	yes	Section 3.1 - Statement of Intent Clause 2.6	Section 3.1- Statement of Intent: The company's processes and procedures to meet the requirements of this Standard shall be documented to allow their consistent application, to facilitate training, and to support due diligence and the supply of a safe product. Clause 2.6 The company shall identify and record all potential hazards associated with each step of the product flow. The company shall include consideration of the following types of hazard: • microbiological growth (e.g. resulting from temperature abuse of products that require temperature control, or exposure of unpacked products to environmental micro┐organisms such as pathogens) • physical contamination (e.g. glass contamination, wood splinters from pallets, dust or pests) • chemical or radiological contamination (including product tainting) • physical damage (e.g. breakage, puncturing of packaging, water damage or electrical faults) • fraud (e.g. substitution or deliberate/intentional adulteration) • malicious contamination of products • allergens (e.g. cross-contamination during storage or transportation of open product in silos or tankers) • hazards impacting the functional integrity of packaging materials and their performance • any other hazards mandated by the customer or relevant regulatory authorities.	Yes	

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FSM 8.4	Food fraud	The agent / broker shall ensure that their suppliers comply to key elements FSM 8.1, 8.2, 8.3	yes	Clause 4.1.2	This clause refers to compliance with clause 8.1, however, there is no clause 8.1 in this scope. The process for the initial and ongoing approval of manufacturers of products shall be based on risk. It shall include one or a combination of the following: • Valid certification of the manufacturing or packing site to the applicable BRCGS Standard or a standard benchmarked by the Global Food Safety Initiative (GFSI). The scope of the certification shall include the products traded by the agent or broker. • A supplier audit with a scope to include product safety, traceability testing, HACCP or hazard and risk management review, the product security (food defence) plan, the product authenticity plan, and good manufacturing practices. The audit shall include confirmation that these plans form part of the supplier's product safety management system and that any resultant actions are implemented. The supplier audit shall be undertaken by an experienced and demonstrably competent product safety auditor. Where it is completed by a second or third party, the company shall be able to: • demonstrate the competency of the auditor • confirm that the scope of the audit includes product safety, traceability, HACCP or hazard and risk management review, the product security (food defence) plan, the product authenticity plan, and good manufacturing practices • obtain and review a copy of the full audit report. For products (food or non-food) assessed as low-risk only, and where a valid risk-based justification is provided, initial and ongoing approval may be based on a completed manufacturing site questionnaire. As a minimum, the questionnaire shall demonstrate that the supplier has effective action plans to control product safety, product security (food defence) and product authenticity. The questionnaire shall be reviewed and verified by a demonstrably competent person.	Yes	
FSM 9.1	Documentation requirements	A procedure shall be established, implemented and maintained for the management and control of documented information required to demonstrate the effective operation and control of processes and the Food Safety Management System.	yes	Sections 3.2 and 3.3.	Statement of Intent 3.2: The company shall operate an effective document control system to ensure that only the correct versions of documents are available and in use. Statement of Intent 3.3: The company shall maintain genuine records to demonstrate the effective control of product safety, legality, integrity and quality.	Yes	
FSM 10.1	Specified requirements / Specifications	Specified requirements or specifications shall be established, implemented and maintained for all inputs to the process, including services that are purchased or provided and have an effect on food safety.	yes	Section 3.6 for example clause 3.6.1 Service providers are covered by section 4.2	Statement of Intent 3.6: Product specifications or information to meet legal requirements and to assist customers in the safe usage of the product shall be maintained and available to customers. Clause 3.6.1: Specifications shall be available for all products. They shall either be in the agreed format of the customer or, where this is not specified, include key data to meet legal requirements and assist the customer in the safe usage of the product. Clause 4.2.3 (for example): Contracts or formal agreements shall be in place with the service providers. These shall clearly specify the service requirements and shall ensure that potential product safety risks associated with the service have been addressed.	Yes	
FSM 10.2	Specified requirements / Specifications	A review process of the specified requirements or specifications shall be in place.	yes	Clause 3.6.4	Specifications shall be reviewed whenever products, packaging or suppliers change, or at least every 3 years. The date of review and the approval of any changes shall be recorded. The company shall seek formal agreement of any changes (in accordance with clause 3.6.2).	Yes	
FSM 11	Procedures	Effective procedures and instructions shall be established, implemented and maintained for all processes and operations having an effect on food safety.	yes	Sections 3.1 and 3.2.	Statement of Intent 3.1: The company's processes and procedures to meet the requirements of this Standard shall be documented to allow their consistent application, to facilitate training, and to support due diligence and the supply of a safe product. Statement of Intent 3.2: The company shall operate an effective document control system to ensure that only the correct versions of documents are available and in use.	Yes	
FSM 12	Resource management	The resources needed to establish, implement, maintain, review and improve the Food Safety Management System shall be identified and assigned.	yes	Clause 1.1.6	The company's senior management shall provide the resources required to ensure the product safety, authenticity, legality and specified quality of products supplied, in compliance with the requirements of this Standard and its customers.	Yes	

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FSM 13.1.2	Purchasing and supplier performance	A purchasing procedure shall be established, implemented and maintained to ensure that all inputs to the process, including externally purchased materials and services which have an effect on food safety, conform to specified requirements or specifications as well as food safety and regulatory requirements.	yes	This benchmark requirement touches many areas of the Standard including: Section 4.4 Also: Specifications is section 3.6 Supplier approval is section 4.1 Management of services is 4.2	Statement of Intent 3.6: Product specifications or information to meet legal requirements and to assist customers in the safe usage of the product shall be maintained and available to customers. Statement of Intent 4.4: The company shall operate processes to ensure that products received comply with buying specifications and that the supplied product is in accordance with any customer specification. Statement of Intent 4.1: The company shall operate procedures for supplier approval and monitoring of the last manufacturer or packer of products for which it provides a service, to ensure that traded products are safe, legal and manufactured in accordance with any defined product specifications. Statement of Intent 4.2: The company shall be able to demonstrate that service providers have been approved, that they are managed to ensure that any risks to product safety have been evaluated, and that effective controls are in place.	Yes	
FSM 13.2.1	Purchasing and supplier performance	A procedure for the evaluation, approval and continued monitoring of suppliers which have an effect on food safety shall be established, implemented and maintained. The procedure shall address procurement in emergency situations to ensure that food still conforms to the documented specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded.	yes	Sections 4.1 and 4.2 Emergency purchases is clause 4.1.8 and emergency services 4.2.6	Statement of Intent 4.1: The company shall operate procedures for supplier approval and monitoring of the last manufacturer or packer of products for which it provides a service, to ensure that traded products are safe, legal and manufactured in accordance with any defined product specifications. Statement of Intent 4.2: The company shall be able to demonstrate that suppliers of outsourced services have been approved, that they are managed to ensure that any risks to product safety have been evaluated, and that effective controls are in place. Clause 4.1.8: The procedures shall define how exceptions to the supplier approval process in clause 4.1.2 are handled (e.g. where product suppliers are prescribed by a customer) or where information for effective supplier approval is not available (e.g. bulk agricultural products) and instead product testing is used to verify product quality and safety. When a company trades customer-branded product, the customer shall be made aware of the relevant exceptions. Clause 4.2.6: The procedures shall define how exceptions to the approval process for suppliers of services detailed in clause 4.2.2 are handled (e.g. where suppliers of services are prescribed by a customer), or where information for effective approval is not available (e.g. emergency transport) and instead product testing is used to verify product quality and safety. When a company trades customer-branded product, the customer shall be made aware of the relevant exceptions.	Yes	
FSM 13.3	Purchasing and supplier performance	Outsourced processes that may have an effect on food safety shall be identified and controlled. Such controls shall be documented in the Food Safety Management System.	yes	Section 4.2 FSMS is 2.5 and 3.1	Statement of Intent 4.2: The company shall be able to demonstrate that suppliers of outsourced services have been approved, that they are managed to ensure that any risks to product safety have been evaluated, and that effective controls are in place. Statement of Intent 3.1: The company's processes and procedures to meet the requirements of this Standard shall be documented to allow their consistent application, to facilitate training, and to support due diligence and the supply of a safe product.	Yes	

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FSM 14.1.1	Traceability	Procedures shall be established, implemented and maintained to ensure product identification from the supplier (minimum one step back) through any processes undertaken to the recipient of the food (minimum one step forward).	yes	Section 3.7 especially clause 3.7.1	Statement of Intent 3.7: The company shall be able to trace all product lots back to the last manufacturer and forward to the customer of the company. Clause 3.7.1: The company shall maintain a traceability system for all products, which identifies the last manufacturer or place of last significant change of the product (in the case of primary agricultural products this may be the packer). Records shall also be maintained to identify the recipient of each batch of product from the company. Where applicable, the traceability system shall meet the legal requirements in the country of sale or intended use.	Yes	
FSM 14.2	Traceability	Documented tests of the traceability system shall be undertaken to ensure this is operating effectively.	yes	Clause 3.7.2	The company shall test the traceability system to ensure traceability can be determined back to the last manufacturer and forward to the customer. This shall include identification of the movement of the product through the chain from the manufacturer to receipt by the customer (e.g. each movement and intermediate place of storage). The company shall complete at least one traceability test annually. Where the agent or broker subcontracts activity to multiple service providers, additional tests may be required to confirm the effectiveness of the traceability system within the different supply chains. Where a company has multiple office locations, then at least one traceability test annually shall involve products traded or managed by each office. The traceability test shall include the reconciliation of quantities of product traded by the company for the chosen batch or product lot. Traceability should be achievable within 4 hours (24 hours when information is required from external parties).	Yes	
FSM 18.1.1	Product labelling and product information	Finished product shall be labelled to ensure safe use of food, in compliance with the applicable food safety legislation in the country of intended sale.	yes	Clauses 4.5.1, 4.5.2 and parts of 3.6 (Specifications for products)	Clause 4.5.1: The company shall have documented processes to verify the legality of products that are traded. This shall include, as applicable: • labelling information • compliance with the relevant legal requirements, such as export or compositional requirements (e.g. ingredients list, allergen labelling, INCI list) or specific product safety legislation (e.g. directions for safe use, warning labels, flammability) • compliance with quantity or volume requirements. Where such responsibilities are undertaken by the customer, this shall be clearly stated in the contracts. Clause 4.5.2: The company shall have documented processes to verify that the product bears the appropriate information according to the customer's requirements. Statement of Intent 3.6: Product specifications or information to meet legal requirements and to assist customers in the safe usage of the product shall be maintained and available to customers.	Yes	
FSM 18.2	Product labelling and product information	When product is unlabelled, all relevant product information shall be made available to ensure the safe use of the food by the customer or consumer.	yes	Section 3.6 (Specifications for products) and 4.5 (product legality and labelling)	Statement of Intent 3.6: Product specifications or information to meet legal requirements and to assist customers in the safe usage of the product shall be maintained and available to customers. Statement of Intent 4.5: The company shall have processes in place to ensure that the products traded comply with the legal requirements in the country of manufacture and the country of sale, where known.	Yes	

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element number	element name	requirement	Compliant Yes/No	supportive evidence reference	supportive evidence description	Compliant Yes/no	Benchmark leader's comment
FSM 20	Internal audit	An internal audit procedure shall be established, implemented and maintained; it shall cover all elements of the Food Safety Management System.	yes	Section 3.5 Clause 3.5.1	Statement of Intent 3.5: The company shall be able to demonstrate that it verifies the effective application of its product safety and quality system and the implementation of the requirements of the Standard. Clause 3.5.1- There shall be a scheduled programme of internal audits. As a minimum, the programme shall include at least two 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 shall be covered at least once each year. As a minimum, the scope of the internal audit programme shall include the: • implementation of the product safety and quality management system • HACCP plan or product safety plan (i.e. the documents and outputs from section 2) • product security or food defence (see section 4.3) • product fraud mitigation plan (see clause 4.8.3) • procedures implemented to achieve the Standard. Each internal audit within the programme shall have a defined scope and consider a specific activity or section of the product safety activities.	Yes	
FSM 21	Complaint handling	A procedure for the management of complaints and complaint data shall be established, implemented and maintained to ensure that complaints are assessed and corrective actions implemented, when necessary.	yes	Section 3.8	Statement of Intent 3.8: Customer complaints shall be handled effectively and the information used to reduce recurring complaint levels. Clause 3.8.1: All complaints shall be recorded and investigated, and the results of the investigation recorded. Corrective action appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.	Yes	
FSM 22	Serious incident management	An incident management procedure, including product recall and withdrawal, shall be established, implemented and maintained. The recall procedure shall be regularly tested for effectiveness.	yes	Section 3.11 Inclusion of withdrawal/ recall process is in the statement of intent Testing recall is section 3.11.3	Statement of Intent 3.11: The company shall have a plan and system in place to manage incidents effectively and enable the effective withdrawal and recall of products should this be required. Clause 3.11.3: The product incident management procedures (including those for recall and withdrawal) shall be tested at least annually, in a way that ensures their effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test and of any actual recall shall be used to review the procedure and implement improvements as necessary.	Yes	
FSM 23	Product release	A product release procedure shall be established, implemented and maintained.	yes	Section 4.7	Statement of Intent 4.7: Where products require formal release by a customer or legal authority, the company shall ensure that an effective product release procedure is in place with the facilities holding products on behalf of the company.	Yes	

Section 2 - Food Safety Management System Requirements

Name of Certification Programme: BRCGS Agents and Brokers Issue 3

GFSI Benchmarking Requirements version 2020			CPO self assessment			Benchmark leader assessment	
element number	element name	requirement	Compliant Yes/No	supportive evidence reference	supportive evidence description	Compliant Yes/no	Benchmark leader's comment
FSM 24.1	Control of non-conformity	A procedure shall be established, implemented and maintained to ensure that any non-conformity impacting food safety and any non-conforming products are clearly identified and controlled to prevent unintended use or delivery.	yes	Section 3.9 Section 3.10 Clause 3.11.2	Statement of Intent 3.10: The company shall ensure that any out-of-specification product is effectively managed. clause 3.9.1: The company shall have a procedure for handling and correcting non-conformities identified within the scope of the product safety and quality management system. Where a non-conformity places the safety, authenticity, legality or quality of products at risk, this shall be investigated and recorded. The investigation shall include: • clear documentation of the non-conformity • assessment of the consequences by a suitably competent and authorised person • identification of the corrective action to address the immediate issue • assignment of responsibilities for action • appropriate timescales to ensure correction • verification that the correction has been implemented and is effective. Clause 3.11.2: The company shall have documented procedures designed to report and effectively manage incidents and potential emergency situations that impact food safety, legality or quality, including a product withdrawal and recall procedure. This product recall and withdrawal procedure shall include, as a minimum: • identification of the key personnel constituting the recall management team, with clearly identified responsibilities • guidelines for deciding whether a product needs to be recalled or withdrawn, and the records to be maintained • an up-to-date list of key contacts or reference to the location of such a list (e.g. recall management team, emergency services, suppliers, customers, certification body and regulatory authority) • a communication plan that includes: • the process for providing information to customers and regulatory authorities in a timely manner • instructions for customers on the return or safe disposal of recalled product • details of external agencies providing advice and support as necessary (e.g. specialist laboratories, regulatory authority and legal expertise) • a plan to handle the logistics of product traceability, recovery or disposal of affected product and stock reconciliation • a plan to conduct root cause analysis and to implement ongoing improvements to avoid recurrence (this may be an assessment or verification of the supplier's root cause and preventive action plan where the incident occurred within the supply chain, rather than within the agent/broker's operations) • a plan to record timings of key activities. The procedure shall be operable at any time. BRCGS position is that corrective action must not be limited to situations where product safety has already been implicated, it is a vital tool for ensuring all non-conforming situations are managed thereby preventing a situation from impacting product safety in future. The Interpretation Guideline highlights this is the case: The objective is to establish clear procedures to deal with any problem that could affect safety, authenticity, legality or quality, ensuring that product and consumer safety are not compromised. The aim is for information from all failures in the safety and quality management system to be used to make improvements, not just those requiring immediate action	Yes	
FSM 25	Corrective actions	A procedure shall be established, implemented and maintained for the determination and implementation of corrective actions in the event of any significant non-conformity relating to food safety.	yes	Section 3.9	The company shall be able to demonstrate that it uses the information from identified failures in the product safety and quality management system (e.g. non-conforming products, internal audits, complaints, product recalls, product testing, second- and third-party audits) to make necessary corrections and prevent their recurrence.	Yes	