

BRCGS Food Safety F837: Position Statements

Document Scope

Where clarification of interpretation of a requirement of the Global Standard for Food Safety or its protocol is necessary this will be published on the BRCGS website (www.brcgs.com) as a Position Statement. Such statements are mandatory in their use from the date specified for implementation or the date of publication on the BRCGS website, where no date is specified.

Change log

Version no.	Date	Description
1	29/5/2019	First issue of a position statement on clause 1.1.2 and changing certification body for a re-audit.
2	03/09/2019	Addition of Position Statement 3 – Cooked Crustacea
3	17/03/2020	Addition of Position Statement 4 – Environmental monitoring

Contents

Clause 1.1.2	3
Changing Certification Body for a Re-audit	5
Cooked Crustacea	6
Environmental Monitoring (Section 4.11.8)	7

Clause 1.1.2

The following position statement has been agreed to ensure expectations relating to compliance with clause 1.1.2; its consistent application at certificated sites, and assessment during audits are understood.

The clause is applicable to all sites certificated to Issue 8 of the Standard and shall be audited as part of all audits of the Standard.

In summary, the clause requires sites to:

Define and maintain a clear plan for the development and continuing improvement of food safety culture. This plan must include:

- Clearly defined activities that will be completed
- Involve all sections of the site that have an impact of product safety (whilst specific activities may be relevant to certain departments or roles, overall the plan must ensure that all relevant section/roles are covered)
- An action plan indicating how the identified activities will be undertaken/completed
- Measurement of the activities (i.e. where they completed, where the correct people involved, were activities successful, any other learnings)
- Intended timescales for the completion of the activities
- A review of the effectiveness of completed activities

Where sites are non-compliant, the non-conformities shall be graded as follows:

Major Non-conformity

Where the site does not have a documented plan for food safety and quality culture. In this context a plan is more than a short statement of intent, but documentation incorporating the requirements of the clause (as summarised above).

Minor Non-conformity

Where a documented plan exists, but is:

- of poor quality (e.g. insufficiently detailed, for example missing timescales for completion or absence of clear action plans)
- does not cover all the relevant areas or staff
- not fully implemented (e.g. some activities not implemented or not completed to predefined schedule).

Site review of the effectiveness of completed activities

The third bullet point in the clause requires sites to undertake a review of the effectiveness of completed activities.

However, as audits to the Standard only commenced in February 2019 it is possible that this review of the success of the programme, would not always be implemented in year 1 and therefore non-compliance with this bullet point is not considered a non-conformity until the site's second audit to Issue 8.

Corrective action required to enable certification

Corrective action, root cause analysis and preventive action plans shall be developed in accordance with the section 2.3 of the audit protocol.

Grading: The non-conformance shall be included in the calculation of the site grade.

Effective date: 1st June 2019

Changing Certification Body for a Re-audit

A re-audit in the context of this requirement is an audit carried out before the usual audit due date or the audit following a failure to be certificated. This most often occurs to improve the audit grade.

Sites have the ability to request a re-audit however this must be completed by the Certification Body who issued the current certificate.

In exceptional circumstances, a site may be permitted to change Certification Bodies for the re-audit when agreed in advance by BRCGS. Where a change in Certification Body has not been sanctioned, the re-audit will be null and void and will not be accepted onto the BRCGS Directory.

Justification shall be provided in writing to the Certification Body who shall submit it to BRCGS for consideration through the formal concession process.

Effective date: 1st June 2019

High Risk and High Care Production Zones for Cooked Crustacea

This Position Statement summarises BRCGS expectations in terms of production risk zones for cooked crustacea i.e. where the crustacea is cooked as part of the production process or where it was cooked at an earlier step in the production process including at another site.

According to the definitions in appendix 2 of the Standard, these products fit into the definition of high risk:

- Finished product is chilled or frozen to preserve food safety
- All components have received a full cook (equivalent to a 6 log reduction in *Listeria monocytogenes*)
- Finished product is vulnerable to growth of pathogens or survival of pathogens that could subsequently grow during normal storage and use
- Finished product is ready to eat or ready to heat or, on the basis of known consumer use, are likely to be eaten without adequate cooking.

Although the Standard recognises that some food products can be effectively managed using consumer cooking instructions. Consumer cooking instructions are not considered a valid justification for the production zone for cooked crustacea, as known consumer use, in many countries, is to eat the product cold without any heating and certainly without a full cook. Furthermore, the product appearance could lead consumers to believe the product is already fully cooked, and that no additional cooking is required.

Where a site is currently producing fully cooked crustaceans in a high care area, this will continue to be permitted, providing the key product safety controls relating to segregation and prevention of pathogen contamination of the cooked products are rigorously implemented and validated. Clause 8.1.3 states that where full physical barriers are not in place in the high care area, the site shall have undertaken a documented risk assessment and have introduced effective, validated processes shall be in place to protect products from contamination and this validation and implementation will be assessed as part of the audit.

From Issue 9 of the Standard onwards, all fully cooked crustaceans will be considered high risk (and will therefore need to meet the relevant high-risk requirements of the Standard). Where a site is partially heating a crustacean (i.e. less than log 6 reduction in *Listeria monocytogenes*) then a high care area will remain appropriate.

Statement publication date: 3rd September 2019

Environmental Monitoring (Section 4.11.8)

This Position Statement summarises BRCGS expectations in terms of environmental monitoring and compliance with section 4.11.8 of the Food Safety Standard Issue 8:

It should be noted that this section of the Standard (section 4.11.8) relates to microbiological contaminants such as pathogens and spoilage organisms.

Environmental monitoring is an important tool in ensuring the production of safe food and preventing microbiological contamination. As a technique it adds value in mitigating risks from both pathogens and spoilage organisms in the majority of food manufacturing operations.

There are however, a small number of products which are inherently safe from these contaminants (e.g. due to the intrinsic properties of the product which do not support the growth or survival of pathogens or spoilage organisms) and where there is no opportunity for spoilage/pathogen contamination, and therefore an environmental monitoring programme is not required.

The BRCGS Technical Advisory Committee are keen that where sites believe that environmental monitoring is not required, this has a strong foundation in science and is not used as a work around. Therefore:

- It is expected that all sites with high risk, high care or ambient high care operations have an environmental monitoring programme within the relevant open product areas.
- It is generally expected environmental monitoring will be applicable to all other products as there have also been a number of very high-profile food poisoning outbreaks associated with products not conventionally considered as high risk/high care, for example, cantaloupe melons, peanut butter, chocolate and milk powder where environmental monitoring may have been effective in identifying an issue early. Similarly, shelf-life issues such as mould contamination of bakery products may be reduced by suitable monitoring.
- Where a site believes environmental monitoring is not required due to the absence of risk from pathogens and spoilage organisms, the site must prove this absence of risk. As a minimum the site will have a robust risk assessment which considers:
 - both spoilage organisms and pathogens
 - the complete product range at the site

Examples of products where risk assessment may establish that environmental monitoring is not required include:

- Alcoholic beverages and vinegars with a sufficiently high level of alcohol or acid to prevent survival and growth
- Salt and sugar in their dry 'pure' form
- Edible oils with no added ingredients
- Fully enclosed production. For example, at a specialist HPP (high pressure processing) facility, where product is received packed, is processed in its packaging and leaves the site in the same packaging.
- Whole vegetables, sold unwashed

Auditors are required to challenge the basis of any risk assessment to make sure this has properly considered likely issues and is demonstrably based on robust science.

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