



BRC Certification Guidebook

- Food
- Storage and Distribution

BSI/AU/RB/BRC/280415

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1. Introduction

This BSI Certification Guidebook is designed as a supporting document to the BSI Standard Terms and Conditions as a binding addendum to the legal contract. This document provides your organization with guidance on the requirements for certification to the British Retail Consortium Global Standard for Food Safety (BRC Global Food Safety) and BRC Global Standard for Storage and Distribution (BRC Global Storage and Distribution) schemes throughout the BSI Group.

2. Accreditation Status

Certification to this standard is accredited.

BSI holds accreditation for this standard with ANSI (American National Standards Institute).

This scheme follows the requirements of ISO 17065:2012

3. The Recognition Process

The following section outlines the steps that apply during the BSI recognition process for BRC.

BSI reserves the right to provide its clients and those that request quotations with marketing and technical information relating to standards, training and compliance services.

3.1 Initial Inquiry

BSI will respond to either verbal or written expressions of interest from organizations interested in one or more of our programs. If your organization is located near one of BSI's offices, an advisory visit may be arranged to discuss your recognition requirements and how BSI can help your organization achieve them.

BSI will also, on request and receipt of a Request for Quotation, prepare a proposal tailoring our services to your organization's needs.

3.2 Application for Certification and Assessment

Receipt of your organization's Application form (or authorized acceptance of a valid BSI proposal), along with the accompanying payment of the non-refundable application fee (or invoicing instructions) together with this document forms the contract between your organization and BSI.

Your requirements will be entered into our database and a Client Manager will be appointed to look after your certification or assessment requirements. The Client Manager will be your primary point of contact with BSI and is responsible for ensuring that our certification/assessment services are delivered to your organization in the most effective manner possible.

3.3 Enrolment Program

An enrolment program has been introduced with Issue 6 of the BRC Global Standard for Food Safety. The scheme has been introduced as a starting point for organizations new to the BRC standard. This process begins with registration on the BRC Directory and allows the recognition of improvements to food safety for organizations that are not ready for certification.

The audit reports and scores from these assessments can be shared with customers. The BRC standard provides greater detail on this process in Section III or discusses this option with your BSI Sales team member.

3.4 Client Contact

As soon as practicable after receipt of your signed application/proposal, a BSI Client Manager (or nominated representative) will contact your organization. The Client Manager will seek to establish a working relationship between your organization and BSI, and to confirm your recognition requirements in

terms of the certification or assessment services, standards or codes of practice, locations, and activities and/or products to be included in the scope of certification.

The Client Manager (or nominated representative) will seek to gain an appreciation of the structure of your organization and the activities being conducted. In particular the Client Manager will:

- Seek an appreciation of the nature and scope of the organization's activities, structure and location(s), including any activities for which confirmation is being excluded; and
- Determine the status of system documentation and implementation including organizational policies, objectives and targets.

If you are working with a consultant it is often useful for that person to be party to the communication process.

3.5 Gap Analysis (optional)

A Gap Analysis (sometimes called a Pre-Assessment) approach often proves an invaluable tool in determining system implementation, particularly for new systems that are still in the early stages of development. This one-off assessment includes the identification of gaps against the requirement of the nominated Standard or Code of Practice. At the conclusion of the Gap Analysis you will receive a report which highlights any gaps as well as options for next steps on your path to certification. The results of a Gap Analysis are not directly linked to any subsequent Certification Audits.

3.6 Certification Audit

The purpose of the Certification Audit is to establish whether your organization's food safety management system has been implemented and complies with the relevant standard by examining actual practices, documentation and records and comparing them against the organization's policies and procedures. The audit process is, effectively, an undertaking to establish that your documented policies and practices are understood by your personnel and have been effectively implemented.

The Audit will be led by appropriately qualified and experienced auditors and, where required, witness auditors, observers and/or technical specialists acting as advisers to the audit team may also be present. These specialists bring current specialized knowledge of the activities being audited to the audit team and ensure that the audit provides a relevant and practical review of aspects critical to the business.

BSI assessors use BRC issued checklists to complete your assessment which provides the auditor. These checklists form the basis of the report.

At least 50% of the assessment time will be spent auditing production and site facilities, interviewing staff, observing processes and reviewing documentation in the production areas with relevant staff.

Production activities relevant to the scope of certification must be occurring at every assessment in refer for HACCP and control activities to be verified within your business.

3.7 Certification Audit Report

At the conclusion of the audit, the audit team will prepare a written report on the audit findings and the audit team leader will present these findings to your organization's senior management at the exit meeting. The Audit report format is provided by BRC.

The audit findings include a summary of the overall compliance of your system with the requirements

of the relevant standard(s) or codes of practice. The final report will be subsequently provided after completion of the Audit.

The audit report will include the following information;

- An executive summary of the overall findings (conclusions) on the effectiveness of your system in meeting the requirements of the standard
- An overall rating of your organizations compliance to the BRC standard
- Positive finding areas

A copy of audit reports and results are provided to the BRC in accordance with their requirements, and may include associated notes and documentation. Information may also be shared with BSI's Accreditation Body (ANSI) personnel, who are in turn, bound by confidentiality.

3.8 Non-conformances

Non-conformities will be discussed with your team during the auditor's visit and outlined at the exit meeting. Non-Conformities are categorized as Critical, Major and Minor. Observations are not raised at BRC assessments.

Non-conformances are raised against the clauses of the standard. The standard does not permit clustering minor non-conformances for one clause into one minor non-conformance. The standard does permit escalation from a minor to major non-conformance where there are many minor non-conformances against one clause.

In some circumstances the number or severity of non-conformances raised at the audit prevents the site being certificated following that audit.

If your organization is unclear of the information in the report, please contact your BSI Client Manager as soon as possible.

Where non-conformances have been raised during your organizations' assessment BSI will provide guidance on the steps that are needed to take place to continue to certification. Such guidance may include timeframes for close out or requirement for re-assessment. BSI cannot provide guidance on how to close out non-conformances.

Non-conformances identified at an assessment are required to be closed out within 28 days of the assessment.

It is your organization's responsibility to respond to the non-conformities detailed in your audit report by the designated time frame. Failure to do so may result in suspension or cancellation of your certification. Definitions and close-out requirements for non-conformities are defined in the BRC Global Standard for Food Safety Issue 6, section 9.

3.9 Audit Cycle and Certification

Audits are conducted in accordance with the requirements of the Standard and this is dependent on the audit rating received (refer BRC Global Standard for Food Safety, Issue 6; section 10, Table 1).

Follow-up audits will be required to be conducted whenever a major or critical non-conformities are raised which are unable to be closed out off-site.

Production activities relevant to the scope of certification must be occurring at the time of the audit, in order for HACCP and control activities to be verified within your business.

3.10 Certification Decision

After confirmation that any necessary corrective actions have been taken, which may involve a follow up visit by the BSI Assessor, the findings and recommendations made in the audit report are subject to an internal review process prior to certification being granted.

BSI auditors undertake an extensive review process of audit reports and there may be occasions when audit report gradings are revised based upon discussions with the Compliance and Risk Food team.

3.11 Certificates

When your organization has achieved certification, BSI will provide you with a certificate as a statement that your organization has achieved certification to the relevant BRC standard. The certificate will include important data such as your organization's certification number, the standard for which certification has been granted, and the date of certification. The certificate should be displayed where it will be seen by customers and potential customers.

Certificates are issued for a period of three (3) years.

When copies or elements of the certificate are used in tenders or offered to potential or existing customers, the certificate should be accompanied by the scope of certification document (if issued separately) as it is important for them to understand the scope of activities for which certification has been granted (see section 3.11 Scope of Certification below).

Incorrect use of the certificate can result in a customer being misled as to the extent of your organization's certification. Clients are obliged to ensure that BSI has been formally notified of the latest address, ownership, changes to key management responsibilities, major management system changes and capability information so that the certificate maintains its currency. Failure to do so may compromise your organization's certification status.

All original certificates remain the property of BSI Group ANZ Pty Limited and must be returned on request.

3.12 Information to be Provided to BSI Prior to Each Assessment

Your organization is required to provide background information to BSI prior to every assessment. The following information is required as a minimum;

- Summary of Critical Control Points (CCPs)
- Process flow diagram
- Simple site plan
- Management organization chart
- List of products or product groups included within the scope
- Typical shift patterns
- Production schedules to allow the auditor to cover the manufacture of all products covered under the scope
- Recent quality issues, withdrawals and customer complaints

The time to review this information is not included in the assessment duration.

3.13 Audit Duration

BRC have developed an audit duration calculator to determine the amount of time required to conduct the assessment. The calculation for the audit duration is based on;

- The number of Full Time Equivalent Employees
- The size of the manufacturing facility (including Storage facilities)
- The number of HACCP studies included within the scope

Other factors that may either increase or decrease the duration these include but are not limited to;

- The complexity of the manufacturing process
- The number of product lines
- The layout of the site and the impact on the material flow
- The labor-intensity of the process
- Communication difficulties (i.e. language)
- Number of non-conformances at the previous assessment
- The quality of the company preparation

These factors are not permitted to influence the duration by more than 30%

Note: Where the audit duration result is a decimal the duration will be rounded up to the next half day. i.e. 3.3 days will be rounded to 3.5 days

3.14 Surveillance Assessments

Once your organization is certificated BSI may conduct announced or unannounced assessments at any time to validate continued certification.

The audit frequency for announced assessments will be 6 or 12 months depending on the audit outcome from the previous assessment and the assessment grade achieved. Unannounced audit frequencies are determined by the program requirements.

The date of the assessments are taken from the initial audit date regardless of re-visits and audit grade. The next assessment date is scheduled within 28 days of the next audit due date to allow sufficient time to address any non-conformances raised.

Where an audit cannot be scheduled within the correct timeframe a Major Non-Conformance will be raised against your organization.

3.15 Delayed Assessments

The following are justifiable reasons for delaying an assessment. The site is;

- Situated in an area or country where the government has instructed that it is not safe to travel and there is no suitable auditor in the area/country
- Within a statutory exclusion zone that could compromise food safety or animal welfare (i.e. bird flu)
- In an area that has suffered a natural or un-natural disaster, rendering the site unable to produce or the auditor unable to visit.

Audit dates cannot be moved to accommodate either your organization or BSI.

3.16 Early Assessments

It is possible to move the assessment forward of the due date. For example to re-set the audit date to align with other standards. If an audit is brought forward the following requirements are to be applied; The audit report will detail why the audit was moved forward.

The audit date will be re-set at this date for future assessments

The certificate should be issued with an expiry date of 12 months (or 6 months depending on audit grade) plus 42 days from the new audit date.

3.17 Seasonal Production Sites

Audits are required to be carried out when the site is in production to ensure that all areas of the standard have been assessed. Where there is a delay in the audit date due to seasonality there is no penalty for your organization. The justification is required to be documented in the audit report.

Where the audit grade is a "C" and your organization is unable to be reassessed within 6 months due to seasonality the next assessment will take place at the start of the next season.

4 Certification Agreement

4.1 Scope of Certification

The scope of certification includes the products produced and the manufacturing processes. The scope is agreed between the organization and BSI and will be reviewed at every assessment. The scope includes;

- Names and addresses of all locations covered by the certification;
- Achievement of certification to the relevant standard(s) or code(s) of practice
- The capability statement (range of products, services, and activities) for each location covered by the certification and
- Any specific exclusions from the scope of certification

Clients are obliged to ensure that BSI has been formally briefed in a timely manner when any variations occur. Clients should not wait until the next scheduled assessment to notify BSI. Failure to do so may compromise the organization's certification status.

Products that are purchased for resale by a site (factored goods) cannot be included in the scope of certification.

4.2 Suspension or Refusal of Certification

In the event that your organization is unable to comply with the requirements of the relevant standard, BSI may refuse to grant certification or suspend your current certificate.

The decision to refuse certification, and the grounds for that decision, will be communicated to your organization in writing.

When an organization's certification is suspended the organization shall, for the period of suspension or refusal:

- Withdraw and cease to use any advertising or promotional material that promotes or advertises the fact that the organization is certified
- Ensure that all copies of certificates and scopes of certification are removed from areas of public display and
- Cease to use the certification mark on stationery and other documents including media and

packaging that are circulated to existing and potential clients, or in the public domain

The organization shall advise BSI in writing of action taken with respect to the requirements listed above;

- BSI shall advise the organization in writing of the certification processes that will need to be completed to restore certification; and
- During the period of suspension the organization shall continue to pay all fees levied by BSI

4.3 Cancellation of Certificate

When an organization's certification is cancelled, the organization shall immediately:

- Cease any advertising and promotional activities that promote the fact that the organization holds certification
- Withdraw and cease to use any advertising and promotional material that promotes the fact that the organization holds certification
- Cease to use relevant certification marks in any way to promote the fact that the organization holds certification and
- Return all certificates and pay outstanding fees

4.4 Variations to Certification

Your organization is required to advise BSI if there are any significant changes to your organization or the product.

Variations to certification may originate from:

- Variations to the scope of certified product
- Major nonconformities
- Voluntary withdrawals
- Withdrawal of certification by BSI Group
- Change of certification scope
- Change of ownership
- Change of management
- Change of company name
- Change of ABN etc.

BSI will determine if the degree of change is significant to require an additional assessment or if the changes can be assessed at the next schedule audit or if the product requires re-assessment.

4.5 Reduction in Scope of Certification

When an organization's scope of certification is reduced, BSI shall issue revised certificates and scopes of certification as appropriate and the certified organization shall:

- Return all superseded certificates
- Ensure that use of the certification mark is adjusted to reflect the reduced scope of certification
- Ensure that all advertising and promotional activities and materials are adjusted to reflect the reduced scope of certification and
- Pay any fees that are applicable for the facilitation of this activity

4.6 Unannounced Audits

Typically audit activities are planned in advance between BSI and your organization. BRC has an unannounced audit option which, within a specific time period, BSI can attend your organization to complete an assessment to the BRC standard and the actual audit date is unknown to your organization.

An unannounced assessment activity can only be applied to an organization that is already certificated. There are two options for Unannounced Audits;

- Full Assessment: The whole standard is audited as one unannounced assessment
- GMP only: Only the GMP component of the standard is carried out unannounced. The Systems assessment is scheduled as an announced activity.

4.7 Additional Locations and Head Office Assessments

The BRC audit scope is site specific however, there are times where activities related to production of the product/s covered under the scope take place at other sites. Where the certificated organization has a head office or production is carried out over two sites these activities can be assessed and incorporated under a single report.

Note: Storage facilities, where they are on the same site as the production facility, shall be included in the audit of the site. Storage facilities located within a radius of 50km from the production site and are owned and managed by the company these sites can be included in the audit report.

4.8 Exclusions from Scope

The expectation of the BRC standard is that the requirements of the standard are integrated throughout the whole organization. Therefore, all products are expected to be covered under the scope of the BRC certification.

Exclusion of products at a site shall be approved by exception by BSI prior to the commencement of the assessment.

- The product/s to be excluded will only be considered for exclusion if they;
 - Can be differentiated from products within the scope
 - Make up the minority of the products by the site
 - Are produced in a separate area of the factory
- Or
- The products are manufactured on different production equipment

4.9 Extensions to Scope

Inclusions of additional products to the scope of certification is possible under the BRC standard. Contact the BSI sales team to arrange this. The new product/s are required to be assessed before adding to the scope of certification. Once the assessment has been satisfactorily completed a new certificate will be issued.

4.10 Auditor Selection

Your organization is obligated to ensure that adequate and accurate information is provided to BSI to ensure that the correctly qualified assessor conducts your assessment. Auditors are not permitted to audit outside of their areas of their expertise and the audit shall be postponed if the auditor cannot complete the assessment.

Auditors are not permitted to conduct an assessment where there is a conflict (or perceived conflict) of interest. Your organization may decline an auditor offered by BSI.

Auditors are not permitted to conduct more than three (3) consecutive assessments at the same site.

5 Use of the BSI Certification Mark

You are entitled to use the appropriate BSI 'kitemark' whilst you maintain certification to this program with BSI. For a copy, visit our website at www.bsigroup.com

Use of the logo is subject to Condition and rules of its application.

6 Use of the BRC Logo

The BRC logo is proprietary and use of the logo is subject to BRC terms and conditions (refer BRC website at www.brcglobalstandards.com).

The BRC logo is not a product certification mark and cannot be used on products or product packaging. If the BRC logo is found to be misusing the mark your organization may risk suspension or cancellation of certification.

7 Standard Owner Information

The British Retail Consortium is the owner of these standards.

Additional information, including copies of the Standards may be obtained through their website at www.brcglobalstandards.com

It should be noted that BRC may elect to contact clients directly for feedback or discussion of audit information. BRC maintains the right to conduct an audit or visit any certificated site in response to complaints or as a part of a routine announced or unannounced BRC compliance activity.

7.1 BRC Global Standards Directory

The Global Standards Directory is an on-line searchable directory of companies that are certificated to the BRC Global Food Standards.

Information about your organization is provided to the Directory by BSI following your assessment. Copies of your report and certificate details are included in the directory.

Your organization can choose to not appear publically on the directory however, this does not exclude your organization from being charged the registration fee.

8 Confidentiality

BSI will treat all information in accordance with the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

9 Additional Obligations

Following certification, there are a number of managerial responsibilities which your organization will need to observe to maintain BSI's certification. These include:

- BRC requires a Registration Fee to be collected by BSI for every assessment undertaken. The certificate and the report are not considered valid unless this fee has been paid. The fee is required to be paid regardless of the outcome of the assessment.
- Continued compliance with the relevant systems standard(s) or code(s) of practice;
- Compliance with the BSI Standard Commercial Terms and Conditions and obligations as specified in this document as well as other guidance documentation that may be specifically provided from time-to-time;

Conduct of regular internal reviews of your system, with appropriate documentation of such reviews and of any subsequent corrective actions;

Communication with BSI

Where the circumstances of your organization change which may affect the validity of your certification to the BRC Standard/s your organization is required to notify BSI of these circumstances immediately.

Examples include but are not limited to;

- Any significant changes in the structure (key responsibilities and management system), ownership and operations of your organization to enable the impact of such changes on the certificated ownership system to be evaluated;
- Any litigation or serious events or matters that relate to the scope of your certification.
- Any significant damage to the site i.e. natural disasters (flood or fire)
- In the event of a product recall your organization is required to advise BSI of the decision to issue a recall within three (3) working days.

BSI will, in turn, assess the situation and make a determination on the status of certification and if any action is required to be taken by either BSI or your organization. In order for BSI to

As a result, BSI may;

- Confirm the validity of certification
- Suspend certification pending further investigation
- Undertake a site visit to ensure that the processes are under control and confirm that certification can be continued.
- Cancel certification
- Issue a new certification (where appropriate)

9.1 Complaints

Your organization is required to keep a record of all known complaints. These records must be made available to the audit team and BSI when requested.

Your organization is required to demonstrate that you have taken appropriate action to address these complaints through investigation and correct any deficiencies found. These actions must be documented.

9.2 Certification Agreement

Your organization is required to meet the requirements of the Certification Agreement. This requires that your organization and products remain compliant with the scheme requirements at and the conditions of certification at all times.

Your organization is required to implement appropriate changes as communicated by BSI in a time appropriate manner.

9.3 Assessment Scheduling

Your organization is required to make all necessary arrangements to allow the evaluation and surveillance activities to take place. This includes but is not limited to; Equipment, Product, Locations, Personnel and Sub-contractors.

9.4 Misleading Statements

Your organization is not permitted to use its product certification in a manner that could bring the BSI into

disrepute. This includes making misleading or unauthorized statements. If you are unsure if a statement could be misleading you are advised to contact BSI prior to making the statement. Statements include but are not limited to the use of the logo on non-certified product, advertising (including your website) and internal communication.

If your organization is required to provide copies of their certification documents these must be reproduced in its entirety. Failure to do so may be misleading to the recipient as to the scope of certification.

9.5 Changes to Circumstances

Your organization is required to advise BSI of any changes without delay to circumstances that may affect certification. Examples of such changes include but are not limited to;

- Authorized Representative
- Business name (Legal entity) and Trading Name (where applicable), ABN
- Ownership
- Contact details
- Location, site addresses
- Business activity/ies, scope of certification (Products and Processes)
- System Management Number of employees, covering all shifts and sites
- Billing Details

9.6 Observers

From time to time BSI requires an Observer to be in attendance at an audit. This may be related to training of new staff and witness assessment of existing staff. It is a requirement of certification that your organization allows these activities to occur.

Failure to allow this activity to occur may result in cancellation of your certification.

BSI will, at all times, ensure that the use of observers is kept to a minimum and your organization will be advised prior to the assessment activity.

The Observer does not take an active part in an assessment.

10 Complaints and Appeals

Appeals against certification decisions and / or complaints against service delivery levels may be raised with your Client Manager. If you remain dissatisfied, contact the BSI General Manager Compliance and Risk in writing.

All complaints will be investigated and the originator of a complaint will be advised of the outcomes, as appropriate.

BSI will also investigate legitimate documented complaints, relevant to operation of the system, from customers of certified organizations and the accreditation body. Certified organizations shall, at all reasonable times, provide representatives of BSI with access to its premises and records for the purposes of investigating such complaints.

If your organization's application for certification has been refused; or your certified organization's certification has been suspended, withdrawn, or reduced in scope, you may appeal against the decision to

a Review Committee constituted and operated as set out below:

- The appellant shall, within 28 days of the disputed advice from BSI, lodge a notice of appeal with an affidavit as to the grounds of appeal with the BSI Group ANZ Pty Ltd's Managing Director in writing;
- The CEO or equivalent shall advise the BSI Group Regional APAC Executive within 14 days of receiving the appellant's notice
- The Executive shall then establish a Review Committee upon payment of the fees set by the Executive for consideration of the appeal
- The Review Committee shall consist of three persons considered as experts in the area of technology or business relevant to the appeal. The Review Committee shall be constituted as follows:
 - One person expert in the relevant area of technology or business appointed by the Board; and
 - Two persons selected by the appellant from a list of four persons nominated as eligible by the Board

The appellant shall represent himself and no legal representation will be allowed unless approved by the Review Committee; and

The Review Committee will carry out investigations as are required, including assessment of information supplied by the appellant and, within a reasonable time, decide by majority vote whether or not to reverse the original decision. The Managing Director or equivalent shall give notification of the decision to the appellant within 14 days of the Review Committee decision.

To raise a complaint or appeal against the service delivery by BSI or audit outcome please notify;

Stephanie Vincent
GM Compliance and Risk (ANZ)
Email: stephanie.vincent@bsigroup.com
Phone: 02 8877 7100

11 Specific Program FAQ's

How do I close out my CAR's?

Corrective Action Information, including evidence, should be sent to one of the following:

Email to: Fooddivision.au@bsigroup.com with your company name and BSI Auditor's name; or

Post to: Food Division
BSI Group ANZ Pty Ltd
Level 7, 15 Talavera Road
Macquarie Park NSW 2113

Please do not send responses to an Auditor's personal email address or any other state office other than Sydney.