

## **BRCGS Food Safety Issue 9 Standard Additional Guidance and Compliance Tips ("Did you know?" LinkedIn post series)**

The BRCGS.com website and the BRCGS Participate platform provide extensive resources to help users fully understand the requirements of the Food Safety Standard.

These include:

- **Interpretation Guidelines**
- **Frequently Asked Questions (FAQ) Document**
- **Various Technical Guidelines**

A comprehensive list of all official BRCGS resources can be found in the **INDEX of Supporting Resources**, available online.

**This document is designed to complement**, not replace, the official BRCGS materials. It provides additional insights into certain clauses and audit protocol requirements, offering accurate interpretations where needed.

Please note, this is not an official BRCGS publication. It has been prepared by ASK SONIA Ltd and is updated every now and then to include new information or to improve wording in order to clarify further certain points.

For those who [follow me on LinkedIn](#), this is a compilation of the '**Did you know**' posts.

There will be more coming... 😊

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# Brand Reputation through Compliance Global Standards

BRCGS means **Brand Reputation through Compliance Global Standards**

and not 'British Retail Consortium anymore 😊

In case you wonder, it changed in early 2019 (<https://www.brcgs.com/about-brcgs/news/2019/brcgs-unveils-new-visual-identity-and-plans-for-2019/>)



Brand Reputation  
through Compliance



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## Part II Section 1 - Be Aware of Any Changes

Part of the compliance to section 1, across all BRCGS standards, is about the certified site being '**aware of any changes to the Standard or protocol that are published on the BRCGS website**'.


It means that you need to know where to look to see whether there might have been any **Position Statements** issued for 'your standard'.

Where to look?


1. Go to the BRCGS.com website
2. Go to **Resources**
3. Go to **Position Statements**
4. <https://www.brcgs.com/resources/position-statements/>

If there has been a position statement published or updated for 'your standard', you will find it there 😊


**‘BEING AWARE OF ANY CHANGES’**

**Global Standard  
FOOD SAFETY  
ISSUE 9**


Clause	Requirements
1.1.9	The site shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website.

**Packaging  
Materials**


Clause	Requirements
1.1.6	The site shall have a genuine, original hard copy or electronic version of the current Standard and be aware of any changes to the Standard or protocol that are published on the BRCGS website.

**Agents and  
Brokers**


Clause	Requirements
1.1.9	The company shall have a genuine, original, hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website.


**Storage and  
Distribution**


Clause	Requirements
1.1.7	The company shall have a current, original hard copy or electronic version of the Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website.

**Global Standard  
GLUTEN-FREE  
ISSUE 4**

Clause	Requirements
1.1.3	The site shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website.

**GLOBAL STANDARD  
FOOD SAFETY ISSUE 9**

**WINNER  
BRCGS  
GLOBAL STANDARD  
FOOD SAFETY ISSUE 9  
2024**

**FOOD  
SAFETY  
ISSUE 9  
SHORTLIST  
BRCGS ATP of the Year**

## Part II Clause 1.1.2 - Food Safety & Quality Culture Improvement Plan

During your BRCGS FS Issue 9 audit, the auditor will assess your business **Food Safety & Quality Culture Improvement Plan (clause 1.1.2)**.

\* The auditor will **NOT** provide a score or a compliance status about the maturity of your business FS&Q culture.

\* They are **NOT** there to say 'your business FS&Q culture is great, weak, or not good enough'



⇒ The auditor will look and assess '**the plan**' and whether the company is giving itself the means to be on an **improvement path** regarding the FS&Q business culture, no matter where that improvement journey started from.

⇒ The auditor will therefore want to see **4 key elements** during the audit:

1. Did the site carry out and document an **initial assessment of its FS&Q culture?** (ideally this involves a combination of staff surveys and/or interviews, review of the site performance against the existing FS&Q KPIs, and observations of food safety related staff behaviours)

2. From that initial assessment, did the site **identify its strengths and weaknesses and establish an action plan** designed to support and improve the FS&Q culture? (this should include clear activities with timelines and responsibilities listed, as well as a record of each activity completion status and an explanation as to how the efficiency of each activity will be measured and monitored)

3. **Is the Implementation of the action plan WIP** (work in progress)? Has it effectively started? (regardless of whether it is a 2-year plan, a 5-year plan etc, is there evidence that some of the activities planned have indeed happened?)

4. Has the site been **reviewing the plan at once every year** to be able to see what works well, what works not so well, what adjustments need to be made? (the auditor will want to see minutes of the review meetings and 'next steps' agreed).

So, to sum up, what the auditor is verifying during the audit, as far as clause 1.1.2 is concerned, is that **the site has adopted the PDCA concept (Plan-Do-Check-Act) for its FS&Q Culture, and that it IS indeed on a culture improvement journey.**

## Part II Clause 1.1.12 – The “BOGOF” Clause

**Root Cause Analysis (RCA)** and **effective corrective actions (CAPA)** are at the very heart of the BRCGS standards.

Therefore, if and when in your BRCGS Food Safety audit you receive **the same NC as in a previous BRCGS audit**, the auditor will:


- **raise that NC (without escalating its severity**, ie if it was a minor, it will again be a minor),
- and also, **they will raise an additional NC against clause 1.1.12**, to indicate that the **site's senior management has failed to address effectively and permanently an NC previously raised**.

To help clients and students remember this particularity of the standard and put in place effective CAPAs, I often call **1.1.12 the ‘BOGOF clause’** (Buy One, Get One Free !!)

### The ‘BOGOF’ clause





Clause

1.1.12



#### Requirements

The site's senior management shall ensure that the root causes of any non-conformities against the Standard identified at the previous audit have been effectively addressed to prevent recurrence.



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## Part II Clause 2.7.1 - Food Fraud & HACCP plan

BRCGS want to ensure that sites take into account **the risk of food fraud being committed ON THE SITE**.

It is why - whether we agree with the idea or not - **food fraud appears as an additional category of hazards** to consider in the HACCP study (clause 2.7.1 // Codex principle 1).

THIS is **on top of the more traditional vulnerability assessment** which sites must have developed to examine their vulnerability to food fraud being committed BEFORE the raw materials arrive on site (clause 5.4.3).

# HACCP PLAN



Clause  
2.7.1



### Requirements

The HACCP food safety team shall identify and record all the potential hazards that are reasonably expected to occur at each step in relation to product, process and facilities. This shall include hazards present in raw materials, those introduced during the process or surviving the process steps, and consideration of the following types of hazard:

- microbiological
- physical contamination
- chemical and radiological contamination
- fraud (e.g. substitution or deliberate/intentional adulteration) (see section 5.4)
- malicious contamination of products (see section 4.2)
- allergen risks (see section 5.3).

It shall also take account of the preceding and following steps in the process chain.


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## Part II Section 3 - Documentation of FS&Q Management System

The BRCGS Food Safety standard requires that **policies, procedures, records, risk assessments, etc., be DOCUMENTED, whether this is explicitly spelt out or not** in the clause considered.





### Documented... or not?



### 3 Food safety and quality management system

#### 3.1 Food safety and quality manual

In many instances, the Standard specifically states that requirements shall be satisfied by documented procedures in others this is implied as the company needs to ensure consistent application throughout the site and show that systems are in place to demonstrate food safety to external stakeholders (including regulatory authorities, customers and the BRCGS auditor). The Standard therefore requires policies, procedures, records, risk assessments, etc., to be documented in sufficient detail to achieve these aims.



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## Part II Clause 3.4.1 - Internal Audits


In the BRCGS FS issue 9 standard, there is a requirement about **each and every internal audit within the programme needing to have a clearly defined scope**.

**A clause title on its own is NOT a well defined scope.**

For example, for a given clause, is the internal auditor required to:





- audit the site practices against the site procedures and the standard?
- or only against the site procedures as someone else will audit the procedures vs the standard?
- do they need to cover all relevant departments?
- or just a few selected departments because their audit is designed to follow up on a particular issue previously raised?
- do they need to go back 3 months? 6 months? a whole year? when checking records...
- or even further due to concerns in the organisation about archiving and back up systems?
- are they carrying the audit only on one site of a multisite group?
- or are they tasked with covering several/all sites within the group?

Each audit scope needs to be defined properly to ensure that the internal auditors are clear on what's expected of them, to ensure independence, also to ensure that 'nothing falls through the cracks' and all activities are audited, as per the standard requirements.

  
**Clause**  
**3.4.1**

### Internal Audits

Requirements
There shall be a scheduled programme of internal audits.
At a minimum, the programme shall include at least four 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 that form a part of the site's food safety and quality systems, including those relevant to food safety, authenticity, legality and quality, shall be covered at least once each year.
The scope of the internal audit programme shall include, although this is not an exhaustive list: <ul style="list-style-type: none"><li>• HACCP or food safety plan, including the activities to implement it (e.g. supplier approval, corrective actions and verification)</li><li>• prerequisite programmes (e.g. hygiene, pest management)</li><li>• food defence and food fraud prevention plans</li><li>• procedures implemented to achieve the Standard.</li></ul>
Each internal audit within the programme shall have a defined scope and consider a specific activity or a section of the HACCP or food safety plan.



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## Part II Clause 3.5.1.2 – Raw Materials Supplier Approval

One of 3 ways in which a supplier of raw materials (including primary packaging) can be approved in compliance with the BRCGS Food Safety issue 9 standard is if the supplier holds a **VALID GFSI recognised certification** (covering in its scope those RMs purchased by the company).

**APPROVAL**  
of suppliers of raw materials,  
including primary packaging



Clause  
3.5.1.2

- a valid certification to the applicable BRCGS Standard or GFSI-benchmarked standard. The scope of the certification shall include the raw materials purchased



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There are **two very important aspects** not to miss to ensure compliance:

1. **Not all certifications are GFSI recognised certifications**; it is important, if in doubt, to check on the GFSI website whether a particular certification scheme is or not recognised: <https://mygfsi.com/how-to-implement/recognition/certification-programme-owners>

*For instance, ISO2200 is NOT, Red Tractor is NOT, HACCP certifications alone are NOT.*

2. Receiving an apparently **up to date supplier's GFSI certificate is not actual proof** that the supplier's certification is still valid. The validity of the certification is something which requires proactive verification to ensure compliance.

So, how to do verify?

- ⇒ **Most CPOs (Certification Program Owners) have some sort of directory/register/database with all the valid certificates they have issued.**
- ⇒ Those who don't will usually have another verification system available, eg a **QR code on the certificate which can be scanned for verification purpose.**
- ⇒ If none of those tools are available, you can usually **contact the CPO by email** to carry out your verification.

*Here are a few examples:*

- BRCGS (Brand Reputation Compliance Global Standards): <https://directory.brcgs.com/>
- FSSC 22000 (Food Safety System Certification 22000): <https://www.fssc22000.com/certified-organizations/>
- IFS (International Featured Standards): **Scan QR code on certificate to be verified**
- SQF (Safe Quality Food): <https://directory.sqfi.com/certified-supplier/>
- GLOBALG.A.P.: <https://database.globalgap.org/search>
- Global Aquaculture Alliance (BAP - Best Aquaculture Practices): <https://www.bapcertification.org/CertifiedFacilities>

## Part II Clause 3.11.3 – Recall/Withdrawal self-testing

A site which had to perform **an actual recall or withdrawal** of its products,


**so long it involved the full recall/withdrawal procedures and that any issues & areas for improvement were identified and dealt with,**

**does NOT need to carry out a self-test of its recall/withdrawal procedures** (in the same year) to comply with the requirements in clause 3.11.3 of the BRCGS Food Safety issue 9 standard.

The actual recall/withdrawal CAN count as the recall/withdrawal test.


Note, if there is evidence that a real recall/withdrawal was not adequately managed, then the auditor will dig further in a bid to understand what the business has put in place to improve this (which may include the performance of additional mock recall/withdrawal exercises to thoroughly test and improve the existing systems).

### Self-testing the incident management procedures (clause 3.11.3)







**Clause 3.11.3**

The incident management procedures (including those for product 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.



If the site has had an actual withdrawal or recall which fully tested its recall procedures, then this would be a substitute for a recall test as long as records are maintained, an analysis of the effectiveness of the recall procedure is carried out, and any areas for improvement are identified and acted upon.



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## Part II Clauses 4.2.1 & 5.4.1 – Food Defence & Food Fraud training

Whilst the BRCGS Food Safety standard issue 9 **requires for the staff involved in developing Food Defence and Food Fraud Vulnerability risk assessments and protection plans to be knowledgeable on those two topics**,

there is **no requirement to have received formal training** on those topics, internal or external, to be compliant with clauses 4.2.1 and 5.4.1 (except if there is a legal requirement).

The auditor should assess staff knowledge/competence by talking to them and reviewing their work, NOT (solely) by checking training certificates.

### ‘Having knowledge of the principles of Food Defence (clause 4.2.1) & Vulnerability Assessment (clause 5.4.1)’







**What the FS issue 9 standard says:**

Clause	Requirements
4.2.1	Where personnel are engaged in threat assessments and food defence plans, the individual or team responsible shall understand potential food defence risks at the site. This shall include knowledge of both the site and the principles of food defence. Where there is a legal requirement for specific training, this shall be in place.

**However:** The Standard is not prescriptive regarding how this knowledge is demonstrated and may include, for example:

- **training** (e.g. a training course in food defence)
- **experience** (e.g. demonstrable knowledge of the site such as security-related duties, or length of service at the site)
- **other competency** (e.g. the completeness and effectiveness of the threat assessment and its implementation).

Formal training is always helpful and so it is encouraged, but  
It is NOT compulsory to comply with this clause (unless there's a legal requirement)



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## Part II Clause 6.2.3 – Erratum 1

There is a **printing error** in the BRCGS Food Safety Issue 9 Standard.

**Clause 6.2.3** should list **4 bullet points, not 3 (packaging and labelling control requirements)**.

More detail in the image.

To access the erratum: [https://www.brcgs.com/product/global-standard-food-safety-\(issue-9\)/p-13279/](https://www.brcgs.com/product/global-standard-food-safety-(issue-9)/p-13279/)

#1 - copy currently says:


Clause	Requirements
6.2.3	<p>Procedures shall be in place to ensure that all products are packed into the correct packaging and correctly labelled. These shall include checks:</p> <ul style="list-style-type: none"><li>• at the start of packing</li><li>• during the packing run (e.g. at predefined intervals and when printed packaging or labels are brought to the line during the production run)</li><li>• when changing batches of packaging materials at the end of each production run.</li></ul> <p>The checks shall also include verification of any printing carried out at the packing stage.</p>

## ERRATUM 1

### Clause 6.2.3

#2 – copy should say:

Clause	Requirements
6.2.3	<p>Procedures shall be in place to ensure that all products are packed into the correct packaging and correctly labelled. These shall include checks:</p> <ul style="list-style-type: none"><li>• at the start of packing</li><li>• during the packing run (e.g. at predefined intervals and when printed packaging or labels are brought to the line during the production run)</li><li>• when changing batches of packaging materials</li><li>• at the end of each production run.</li></ul> <p>The checks shall also include verification of any printing carried out at the packing stage.</p>



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## Part II Section 8 - Production Risk Zones

In the BRCGS Food Safety Issue 9 Standard, **additional requirements** (to what's listed from section 1 to section 7) are listed in section 8, **specifically for High Risk (HR), High Care (HC) and/or Ambient High Care (AHC) areas.**





There are **4 KEY differences** between the HR and HC additional requirements.




See image for details.

### 8 Production risk zones – high risk, high care and ambient high care



#### 4 key differences between HIGH RISK and HIGH CARE areas

	There <b>MUST</b> be a physical segregation between HR areas and other parts of the site; this isn't compulsory for HC areas		There <b>MUST</b> be sufficient changes of filtered air within HR zones; this isn't compulsory for HC areas
	The site <b>MUST</b> maintain a positive air pressure within HR areas, relative to surrounding areas		Time segregation (to control micro contamination risks) is <b>NOT PERMITTED</b> within HR areas



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## Part II Clause 8.1.3 – Erratum 2

There is a translation error in the French version of the BRCGS Food Safety issue 9 standard.


Clause 8.1.3 (in French) **wrongly mentions that High Care zones MUST be physically segregated from the rest of the site.**

In reality, the requirement is that it would **be best if they were physically segregated, but it is NOT compulsory.**





The original version of the Standard, the English one, uses the term 'should' as opposed to 'shall', to reflect this important nuance!!

More detail in the below poster.

To access the erratum: [https://www.brcgs.com/product/global-standard-food-safety-\(issue-9\)/p-13279/](https://www.brcgs.com/product/global-standard-food-safety-(issue-9)/p-13279/)



### ERRATUM #2 - Clause 8.1.3 (French version)



**Erratum for Global Standard Food Safety (Issue 9) – French translation clause 8.1.3**

In the French translation of the Standard clause 8.1.3 we use 'doit' (shall) in a situation that should be 'devrait' (should). Wording should say 'zones de grand précaution, une séparation physique *devrait* être mise ...', not 'doit être mise'. The correct wording is shown below (see #4).

#3 – current copy says:

<b>8.1.3</b>	Lorsque le site de fabrication inclut des zones de grande précaution, une séparation physique doit être mise en place entre ces zones et les autres parties du site. La séparation doit tenir compte du flux de produits, de la nature des matériaux (emballage compris), de l'équipement, du personnel, des substances chimiques, de l'élimination des déchets, des écoulements d'air, de la qualité de l'air et de l'entrée des fluides techniques (canalisations incluses).
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#4 – copy should say:

<b>8.1.3</b>	Lorsque le site de fabrication inclut des zones de grande précaution, une séparation physique devrait être mise en place entre ces zones et les autres parties du site. La séparation doit tenir compte du flux de produits, de la nature des matériaux (emballage compris), de l'équipement, du personnel, des substances chimiques, de l'élimination des déchets, des écoulements d'air, de la qualité de l'air et de l'entrée des fluides techniques (canalisations incluses).
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## Part II Section 9 - Traded Goods

In the BRCGS Food Safety Issue 9 Standard, **traded products** (section 9) are defined as **food products** that **would normally fall within the scope** of the Standard and are **stored at the facilities** of the site being audited, but that are not manufactured, processed, reworked, packed or labelled at that site.

'Traded products' **do not actually need to be 'traded'** by the certified site (ie, purchased and sold on) for section 9 to be applicable. **The requirements in section 9 will apply even if the 'traded products' are only stored on site**, for instance on behalf of a sister site.



### 9 Requirements for traded products

Traded goods/products	Traded products are defined as food products that would normally fall within the scope of the Standard and are stored at the site's facilities, but are not manufactured, processed, reworked, packed or labelled at the site being audited.
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## Part III – Preparing for the Audit

To assist sites with self-evaluating their practices and systems against the **Food Safety issue 9** standard, BRCGS have translated the Self-Assessment tool into 8 languages 😊

In no particular order:

- Spanish
- English
- Thai
- Viet
- Italian
- Turkish
- German
- French

The self-assessment tool is FREE to download: <https://www.brcgs.com/our-standards/food-safety/help-and-guidance/>

### Food Safety issue 9 Self-assessment tool



#### Self-Assessment

<b>Food Safety 9 Self-Assessment Checklist (Spanish)</b> When preparing for your audit, use the self-assessment checklist.  <a href="#">Download</a>	<b>Food Safety 9 Self-Assessment Checklist (English)</b> When preparing for your audit, use the self-assessment checklist.  <a href="#">Download</a>	<b>Food Safety 9 Self-Assessment Checklist (Thai)</b> When preparing for your audit, use the self-assessment checklist.  <a href="#">Download</a>	<b>Food Safety 9 Self-Assessment Checklist (Viet)</b> When preparing for your audit, use the self-assessment checklist.  <a href="#">Download</a>	<b>Food Safety 9 Self-Assessment Checklist (Italian)</b> When preparing for your audit, use the self-assessment checklist.  <a href="#">Download</a>	<b>Food Safety 9 Self-Assessment Checklist (Turkish)</b> When preparing for your audit, use the self-assessment checklist.  <a href="#">Download</a>	<b>Food Safety 9 Self-Assessment Checklist (German)</b> When preparing for your audit, use the self-assessment checklist.  <a href="#">Download</a>	<b>Food Safety 9 Self-Assessment Checklist (French)</b> When preparing for your audit, use the self-assessment checklist.  <a href="#">Download</a>
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## Part III - The Certifying Audit

There are a number of items that the **BRCGS Food Safety auditor MUST cover** during the on-site audit, as a minimum (see picture).

Opening meeting and closing meeting will always be first and last, respectively, in the agenda, but for the rest, the auditor is free to plan the way they see fit.

The auditor must aim to **spend about 50% of their time in the factory** (auditing production and site facilities, interviewing staff, observing processes and reviewing documentation in production areas with the relevant staff).

Good to know: They have authority to flex the audit duration calculated in principle by up to 30% depending how the audit is going (reduction or increase!)



## Part III - The Mandatory Unannounced Audit


In Part III of the FSv9 Standard, explaining the audit protocol, BRCGS talks about a **mandatory unannounced audit being required** - as part of the ANNOUNCED audit option - "every 3 years" (GFSI requirement).

Please understand that **what is really meant is: at least one mandatory audit in a 3 year cycle**, meaning that in principle, a site could very well have 2 unannounced audits on 2 consecutive years!

The Certification Body has the obligation to inform the site, well ahead of the unannounced audit window, that 'this coming year they will have their mandatory unannounced audit', so if it was to ever happen, it should never be a surprise to the site 😊

But still, it's good to know it could happen 🙌

### The mandatory unannounced audit





**What the FS issue 9 standard says:**

**2 Announced audit protocol (with mandatory unannounced audit every 3 years)**

*This is a full announced audit with one mandatory unannounced audit every 3 years.*

**What is really meant:**

**At least ONE unannounced audit within a 3-year cycle**



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## Part III - A Full Certification Audit, Every Year

ISO 22000 and FSSC 22000 follow a three-year cycle, requiring a **recertification audit every three years**, with **surveillance audits conducted annually** to monitor ongoing compliance.

In contrast:

- BRCGS: Requires a **full certification audit every year**.
- IFS Standards: Also requires an annual full certification audit, aligning with the BRCGS approach.



**Full audit** required  
every single year

To maintain certification status!



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## Part IV - BRCGS Integrity Visits

Once your site has been audited by the Certification Body, **it could be audited again by auditors mandated by the BRCGS themselves!**

This is NOT a certification audit, but a compliance audit, also called '**integrity visit**'.

- A BRCGS integrity visit **will last one day** regardless of the size of the site
- If it is going to happen to your site it will usually be within 3 months of your certifying audit
- You will get **very little notice** (most of the time none at all)
- **You could get new NCs (and your CB could get some too!)**
- You have a contractual **obligation to deal with those NCs** just the way you would with your normal CB audit NCs, although, these **new NCs will not affect your site grade**
- BRCGS aims to complete integrity visits on about 0.5% of certified sites each year.

### Technical governance of the Standard

**Achieving consistency – compliance**



BRCGS audits the offices of certification bodies and accompanies auditors at site audits to observe their performance. BRCGS also undertakes independent visits to certificated sites to ensure that standards of food safety and quality are being maintained in line with their certification status and that the audit and reporting process are to the expected standard.

**In 2023, we completed 223 integrity visits in 33 countries covering a range of BRCGS Standards, with 13% of the visits completed remotely.**



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## BRCGS FS Issue 9 - Top Non-Conformities 2023-2024

**TOP NCs coming up in the BRCGS Food Safety Standard** certifying audits  
(Data from 2023/2024)

ALL PRPs related!!... NOT paperwork related 🤖

👉 Check out the latest BRCGS Annual Business Report for further insight, including what the top audit NCs were for the other BRCGS standards:

<https://www.brcgs.com/media/ngklcmgp/brcgs-annual-business-report-2023-24-screen-ready-1.pdf>

### Top non-conformities of 2023-24

Clause	Description	NCs raised
4.11.1	<b>Housekeeping and hygiene</b> The premises and equipment shall be maintained in a clean and hygienic condition.	4,816
4.9.1.1	<b>Chemical and physical product contamination control: raw material-handling, preparation, processing, packing and storage areas</b> Processes shall be in place to manage the use, storage and handling of non-food chemicals to prevent chemical contamination.	3,758
4.4.8	<b>Building fabric, raw material-handling, preparation, processing, packing and storage areas</b> Doors (both internal and external) shall be maintained in good condition.	3,110
4.6.2	<b>Equipment</b> The design and construction of equipment shall be based on risk, to prevent product contamination.	3,090
4.4.1	<b>Equipment</b> Walls shall be finished and maintained to prevent the accumulation of dirt, minimise condensation and mould growth, and facilitate cleaning.	2,915



**Global Standard  
FOOD SAFETY  
ISSUE 9**



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## Appendix 2 – Risk Zones Decision Tree

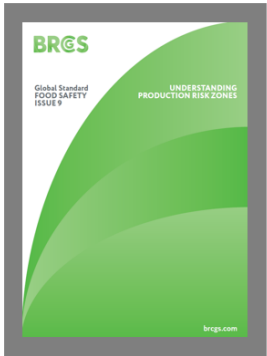
The **Decision Tree** which was within the **Appendix 2 of the BRCGS Food Safety Issue 8 standard** (High Risk, High Care, Ambient High Care zones) was taken out of issue 9.

If you're missing it, please note that it can now be found in a separate BRCGS Technical Guideline 🤔 👍

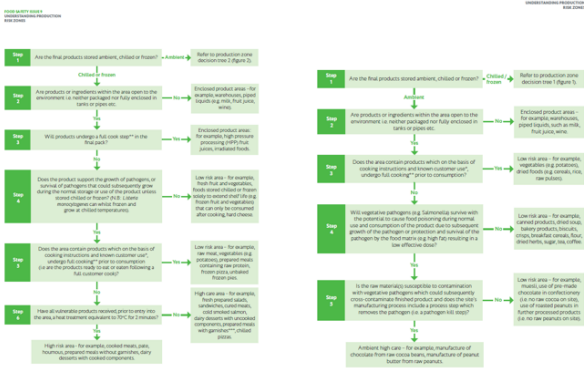
And here is where: <https://www.brcgs.com/product/understanding-production-risk-zones/p-16005/>

(it is also on Participate, for free, if you have access)

### The old Decision Tree of Appendix 2 in FS issue 8...



... can now be found in a separate guideline:  
**FS issue 9 - Understanding Production Risk Zones**



**Figure 1: Production risk zones decision tree 1 - chilled and frozen products**

**Figure 2: Production risk zones decision tree 2 - ambient products**

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## Appendix 10 - Training vs Competence

In the BRCGS Food Safety Issue 9 Standard:

- the terms '**competent**', '**competence**', '**competency**' appear 50 times (I counted them... Nah, of course I did not!)
- and the terms '**training**', '**train**' or '**trainee**' are used 90 times!!

Better make sure we know what we're doing because the BRCGS auditor will be checking that we do!

- Be careful that a **training certificate alone is NOT a proof of 'competence'** and the auditor may/should want to see how the work is done, speak with people, and actually assess whether staff is COMPETENT for their jobs, not just that they have been trained.
- Equally, **where a clause requires to be able to demonstrate 'competence' but makes no specific mention to training being required**, if a site is not able to present a training certificate/record, it does not/should not (alone) give ground for an NC to be raised, so long as the site CAN demonstrate competence.
- One last thing, a few clauses say '**Where there is a legal requirement for specific training, this shall be in place**'. In those cases, you're expected to be able to show proof of training, NOT just of competence.

Appendix 10  
Glossary

**BRCGS**

### 'Training' vs 'Competence'

Competence	Demonstrable ability to apply skill, knowledge and understanding of a task or subject to achieve intended results.
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## Appendix 10 - Once Annually

In the BRCGS Food Safety issue 9 standard, a number of actions have to be carried out '**at least annually**' or the standard also says '**at a minimum annually**' or '**at least once each year**'.

What is meant is that the action needs to be done **at least once within the 12 months following the last time that action was carried out**,

and **NOT** 'once in every calendar year'.

NCs have been raised in certifying audits where this was misinterpreted by a site, resulting in, for instance, 15 months passing between two internal audits covering the same scope.





Fair or not, you will have your own opinion, but now at least, you know and you can ensure compliance 😊👍

Appendix 10  
Glossary

**BRCGS**

**‘Once annually’ | ‘Once each year’**

Annual/annually	Within 12 months since the action was last conducted.
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## Appendix 10 - What is a Label?

There are **55 references made to 'label', 'labelling' or 'labelled'** in the BRCGS Food Safety Issue 9 Standard,

**of which 15 are in relation to fundamental clauses.**

It is therefore very important to understand what BRCGS means by 'label' or 'labelling' in order to ensure compliance to all requirements.

A label is NOT always a 'rectangle of paper' with printed information on it.

*'Any tag, mark, picture or other descriptive matter, whether it is written, printed or otherwise marked, on or attached to the packaging of the product'* is considered a label and must be treated as such by the site.

For example, pre-printed boxes, cans, sleeves, film, bottles are all examples of 'labels' in the sense of the standard.

Appendix 10  
Glossary

What is a 'label' ?



Label	<p>Any tag, mark, picture or other descriptive matter, whether it is written, printed or otherwise marked, on or attached to the packaging of the product.</p> <p>Where a product is unlabelled, specifications or information to meet legal requirements and to assist customers in the safe usage of the product shall be maintained, and are included in the definition of a label.</p>
Labelling	<p>Any words, picture or symbol relating to the food and placed on any packaging or label accompanying the product.</p>



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## Appendix 10 - Primary Packaging

In the BRCGS standards, several requirements apply to 'primary packaging'.

It is important to know that, in the world of BRCGS, **'primary packaging' does NOT mean 'food contact packaging'**.

Primary packaging includes food contact packaging, but also includes any other packaging elements making it into **the final 'unit of sale'** to the consumer or customer, EVEN IF some packaging elements are NOT food contact (eg a label applied to a bottle).

Yes, I know, that's a lot more work for the sites!

Appendix 10  
Glossary





Primary Packaging

**BRCGS**

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Primary packaging	<p>The packaging that <u>constitutes the unit of sale to the consumer or customer</u> (e.g. bottle, closure, label and tamper-evident seal of a retail pack or a raw material bulk container). When identifying primary packaging, due consideration must be given to the processes that minimise or eliminate any risk which may result in contamination of a food product; for example:</p> <ul style="list-style-type: none"><li>• using suitable food contact materials</li><li>• consideration of anything that is applied onto the surface of a permeable food contact material (e.g. potential for migration of ink components through cardboard is a well-documented risk that has affected a range of packaging).</li></ul>
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## Appendix 10 - Raw Materials & Food Raw Materials

In the glossary of the Food Safety Issue 9 Standard, BRCGS distinguish between:

- **Raw Materials** (which include packaging) and
- **Food Raw Materials** (which do NOT include packaging).

There are **TWO clauses in the standard that contain requirements which specifically apply to FOOD raw materials** and which therefore don't currently have to be applied to packaging materials (although you can always do more than the minimum required of course).

The two clauses are 3.9.3 (traceability) and 5.4.3 (Food Fraud vulnerability assessment).

### HOWEVER,

- Please make sure to review 3.9.3 carefully. **You still need to ensure you can trace all packaging and raw materials** and there are important nuances, in particular around **packaging printed with legal or FS information**.
- **You still need to comply with the RM assessment requirements (in 3.5.1.1)** so do not dismiss packaging in your FFVA if you have identified a vulnerability to fraud in your initial RM assessment.



## Index of official BRCGS Supporting Resources

For a list of published resources in relation to the BRCGS FS Issue 9 Standard:

1. Go to the **BRCGS.com** website
2. Go to **Our Standards**
3. Select **Food Safety**
4. Go to the **Help & Guidance** section
5. Scroll down to **Technical Documents**
6. <https://www.brcgs.com/our-standards/food-safety/help-and-guidance/>



### INDEX OF SUPPORTING RESOURCES FOR FOOD SAFETY AND START!

**KEY**

 Information for certification success	 Useful guidance
 Additional documents to support certification	 Other

NB<sup>1</sup>: Some documents can be found in different languages this will be indicated by a "L" after the document title  
NB<sup>2</sup>: Sites must ensure they are in "British Pounds" currency on the left-hand side when searching for these documents on the BRCGS Store

## 'Ask The Experts' Webinars Series

In order to support sites working with the Food Safety Issue 9 standard, BRCGS regularly organises webinars on various food safety related topics. These are then recorded and made available for replay on the BRCGS website.

Here are examples of webinars currently available:

- Environmental Monitoring
- Product testing
- Managing pathogens
- Listeria management
- Food fraud
- Labelling (on-pack)
- Gluten-Free (Free-From Special)
- Internal audits
- Allergen management
- Production risk zoning – high risk, high care and high ambient high care
- Food Safety Culture

To access the webinar series: <https://www.brcgs.com/about-brcgs/news/2023/ask-the-experts-food-safety-webinar-series/>



## BRCGS | How to...?

Visit [this separate resource](#) on the ASK SONIA Ltd website to find out in a couple of clicks about:

- How to become a BRCGS Auditor
- How to take the BRCGS Category Exams
- How to find or become a BRCGS Recognised Consultant
- How to find or become a BRCGS Professional
- How to find or become a BRCGS ATP (Approved Training Partner)
- How to find a BRCGS Approved Certification Body
- How to find a BRCGS Certified Supplier
- How to gain access to BRCGS Participate
- How to locate various BRCGS documents
- And more...

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## How to...?

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