



**F-2132**

**BRCGS IMPACTED AUDITS DUE TO COVID 19**

**NUMBER:** F-2132

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**REVISION No:** 1

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**PURPOSE**

Management of extraordinary events of circumstances affecting certified organizations and CBs, resulting to inability of conducting a normal physical audit.

**APPLICABLE**

Companies already certified against BRCGS standards, including AVMs, e.g. Meat Supply Chain, FSMA.

**CONTENT**

Where there are travel restrictions in specific regions or countries as specified by the local government authorities due to Covid-19, where there are certification body restrictions for auditor travel, or where there are well supported company policies preventing visitors on site, and therefore auditors, in an attempt to reduce risk of personnel – auditor exposure to risk of exposure to Covid-19 cannot reach the site, consequently resulting to an audit cancellation, there can be an extension to the current certificate, based on risk assessment. The extension may be up to 6 months and a physical – normal audit is to take place as soon as government restrictions are lifted and scientific developments suggest that the pandemic is no longer active.

**A. Preliminary steps**

- Confirm that the audit cannot be scheduled or it has been cancelled, due to Covid-19 restrictions – office.
- Evaluate risks of continuing certification without a physical visit. The risk assessment will be based on the matrix presented below and shall be performed for all companies, before an extension to the current certificate can be considered.

**B. Risk assessment matrix**

**Q1: Is the company for which the planned audit was cancelled / cannot be scheduled certified against BRCGS?**

Yes                      No —————▶ **NA – Certificate extension is not possible**



**Q2: Has the previous audit took place by NSF/QMS or is it a transfer from another CB??**

NSF/QMS              Other CB —————▶ **Certificate Extension is not possible**



**Q3: Is the maturity of the system and/or the results of the previous audit such that leads to the conclusion that the continuous of certification is considered safe?**

Yes                      No —————▶ **Certificate extension is not possible**



**Q4: Is there any other third party audit made between the previously successful audit against BRGS, including audit made by a competent authority, and or a second party audit, the results of which leads to doubts over the implementation of the food safety – quality management system and the standards' criteria?**

No                      Yes —————▶ **Certificate extension is not possible**



**Q5: Based on previous company history and auditor experience of the site, are the site standards and the condition of equipment such that it can be safely concluded that the continuous of certification would not raise any doubts over the safety of the products being produced and the effective implementation of the food safety system and the criteria of the standard?**

Yes                      No —————▶ **Certificate extension is not possible**



**Q6: Has the company to be audited the resources available, including human resources, to assist the communication required for verification of the implementation of the food safety – management system?**

Yes                      No —————▶ **Certificate extension is not possible**



**Certificate extension can be considered**

**C. Methodology to be followed after matrix indicated that a certificate extension can be considered**

Steps	Description	Tool	Responsibility
1	Nominate auditor to contact site in order to verify status of implementation of the food safety management system with respect to BRGS requirements.  Three year rule not applicable. Ideally, the auditor should be the last auditor performed the audit based on which current certificate is issued. Auditor must be approved for the category involved.	Previous audit report.  Auditor matrix  Email allocating audit to the auditor	Office - QMS
2	Contact company and ensure that communication channels are established, i.e. company will nominate key members of its staff that will be involved in the communication with the auditor.	Email	Auditor
3	Ask from company to prepare and communicate the data necessary to complete necessary review of documentation.  As a minimum, these will include:	Email - phone	Auditor
	- Current internal audit program and relevant audit reports produced by the company following last audit	Email	Auditor
	- Updated HACCP plan which contains critical control points, their limits and methodology of monitoring.	Email	Auditor
	- Letter from the company that includes information of - a) any possible recalls since last audit, - b) complaints (number total and analysis), - c) significant changes since last audit	Email	
	- Last management review meetings, including objectives review of last year and new objectives.	Email	Auditor
	- An updated master list of documents and records used by the company.	Email	Auditor
	- A site map of the site	Email	Auditor
	- The company's procedure for COVID19, e.g. extra measures in place, personnel controls, visitor controls (if these are allowed), etc.		
	- A set of minimum 10-20 photos, based on company size, covering all areas of the site, including external areas (raw material intake – warehousing, production areas, packaging areas, staff facilities and canteen, external areas of the factory).  <b>Note1:</b> Photos must be named in such way so that auditor understands what the specific photos are showing.  <b>Note2:</b> Photos must contain information – details, i.e. date and time of the photo taken.	Email	
	- Other documents that auditor judges to be necessary to be submitted before the actual communication meeting.	Email	Auditor
4	Define - agree timeframe for data communication to the auditor.	Email	Auditor
5	Define – agree “face to face” meeting; date, time, method of communication, personnel necessary to be present at meeting.	Email	Auditor
6	Study the data provided by the company and make necessary notes.	Data provided by the company	Auditor
7	Conduct meeting with the company. Ideally this would involve a “face to face” meeting, e.g. via skype, or other	Data review through, email, skype, video, photos	Auditor

## BRCGS IMPACTED AUDITS due to COVID 19

Steps	Description	Tool	Responsibility
	<p>method available.</p> <p>Opening meeting – confirm all information necessary, e.g.                      -scope,                      -significant changes since last audit,                      -any legal issues pending, etc.                      -.</p> <p>Attendance register – sent to company to sign and submit after closing meeting.</p> <p>a. Challenge data provided – see point 3 above.</p> <p>b. Confirm implemented policies applied by the company in respect to COVID19 and challenge their implementation, i.e.                      - updated cleaning programs,                      - updated policy for cleaning hands / use of gloves / use for masks,                      - staff shortages (if any) and how these affect product safety /quality                      - contingency plans for raw materials affected and if any, if food fraud risks are increased and considered                      - impacted services, e.g. maintenance – pest control and if these impact operations / product safety – quality, how these are handled and how these are handled                      - determine if company outsources any product or process due to COVID19 (different from previous practice) or if outsourcing took place previously, what are the measures taken by the company to ensure that the supplier of the outsource process / product has implemented practices to handle outbreak of COVID19 virus</p> <p>c. Challenge – audit other aspects of the FSMS system to confirm compliance with the standard, e.g. by conducting a traceability challenge test.</p>		
8	Draw conclusions and submit NCs – closing meeting.	NC report	Auditor
9	Define timeframe for corrective actions – if any	Email – NC report	Auditor
10	Review evidence submitted by the company to close NCs – if any	Evidence sent by company	Auditor
11	Prepare recommendation for certificate extension	Letter or any other format suggested by the CB	Auditor

### **D. Communication of the remote audit to the standard owner where applicable**

Under the responsibility of the office, admin or Technical staff.

### **E. Certificate extension**

Individual standard owner requirements are to be considered as per guidance issued by the standard owners, e.g. validity of the certificate, expiry dates, handling of unannounced audits, level – grading of certificate etc.

**F. BRCGS – packaging standard issue 5**

As per BRCGS072 document, companies certified against issue 5, will have an extension to the current version of their certificate, i.e. issue 5.

**G. BRCGS Gluten free certification program**

As per BRCGS072 document, if GFCP is available by a third party certification other than BRCGS, risk assessment principle is to be applied, as long as third party certification is maintained, ie. Other scheme certificate is permitted to be extended.

**F-2132 REVIEW HISTORY**

<b>Revision No:</b>	<b>Revision Date</b>	<b>Nature of Change</b>	<b>Approval</b>
0	13/03/2020	Original Issue	PD / LDK
1	26/03/2020	Revised due to remote audit removal as option	PD/LDK