

AUDIT INFORMATION & EXPECTATION

BRCGS – ALL STANDARDS

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1. GENERAL

The present certification regulation is about:

• BRCGS Scheme – All standards, as they apply in their current version.

1.1 Audit Options

- Announced audit program (with mandatory unannounced audit every 3 years): The audit date is agreed with certification body in advance of the audit and all requirements of the Standard are audited within the audit visit. All sites certificated to a GFSI Benchmarked Standard for Food safety, Packaging Materials or Storage & Distribution using an announced audit program are affected by the GFSI rule for mandatory unannounced audit every three years. Global Standard Agents and Brokers and the Global Standard Consumer Products are not affected by this rule.
- <u>Blended announced audit program</u> (with mandatory unannounced audit every 3 years): uses information and communication technology (ICT) to remotely audit documented systems and records. The audit is split into two separate parts: a remote audit followed by an on-site audit. The remote audit (first part) uses ICT to focus predominantly on documented systems and records, while the on-site audit (second part) focuses predominantly on production, storage, and other on-site areas.

Can be used for all BRCGS GFSI benchmarked Standards (i.e. Food, Packaging, Storage & Distribution, Agents & Brokers), Consumer Products, and Gluten-Free Certification Program, for additional modules as well. The onsite audit shall be conducted within 28 days of the remote audit in a way that the site has enough time for non-conformity closure and the certification decision can take place within 42 days of the onsite audit. Although it is recommended that remote and onsite audits shall be planned as close to each other as possible. The total audit duration is the same as specified in the specific Standard.

This option is only applicable for re-certification audits and not for the first BRCGS audit at a site. For BRCGS Agents & Broker Standard the initial audit shall also be fully on-site, however, subsequent audits can be completed as a full remote audit (i.e. no onsite audit required) providing this is supported by the risk assessment.

• <u>Unannounced audit program</u>: Every year the audit is conducted Unannounced. The actual date of the unannounced audit will not be communicated to the site. The audit may occur at any stage within the last 4 months of the audit cycle, including the 28 calendar days before the audit due date

1.2 Registration Process

The applicant:



- Must submit to QMSCERT the respective application, including all the relevant information. The application form
 can be found at the QMSCERT web link: http://www.qmscert.com/en/certification-procedures/.
- Upon registration, is committed to continuously complying with the certification requirements and informing QMSCERT T of any changes to its data, as well as be informed of payments of the applicable fees determined by BRCGS and by QMSCERT
- The contract with QMSCERT includes:
 - ✓ Sign the F-2002 Certification Contract QMSCERT.
 - ✓ Acceptance of the BRCGS Standard and Guidelines

1.3 Certification Scope

The scope of certification covers:

- Food Safety: The Standard sets out the requirements for the manufacture, processing and packing of:
 - processed foods, both own brand and customer-branded
 - raw materials or ingredients for use by food service companies, catering companies and/or food manufacturers
 - primary products, such as fruit and vegetables
 - pet foods for domestic animals and animal feed
 - products from animal primary conversion.
- Storage & Distribution: developed to cover all activities which may affect the safety, legality, quality and integrity of the products stored and distributed, and of any additional contracted services that may be offered by storage and distribution companies. The Standard may be applied where the company requesting certification has legal title to the products and where legal title is held by a third party. These products may be branded, private label or unbranded.
- Agents & Brokers: sets out the requirements for companies in the food, packaging, and consumer products supply chain that buy, sell or facilitate the trade of products and may provide additional services such as the purchase, importation, or distribution of the products, but do not manufacture or process those products.
 Brokers Companies that purchase or take title to products for resale to manufacturers, other brokers, retailers, or food service companies but do not directly sell to the consumer.

<u>Agents or non-manufacturing service providers</u> – companies that trade between a manufacturer or broker and its customer but do not at any point own or take title to the goods.

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- Packaging Materials: sets out the requirements for the manufacture of packaging materials that are used in the
 production of, and filling operations for food, hygiene-sensitive consumer products (including cosmetics), raw
 materials, and other consumer products.
- Gluten-Free Certification Program (GFCP): uses product safety and HACCP principles to control physical, chemical, and biological hazards, with gluten control as a focus. The GFCP addresses gluten as a chemical hazard and will certify sites that meet minimum good manufacturing practices and produce safe, gluten-free products.
- GFCP plus AOECS Standard
- Plant-Based Global Standard: applies only to the control of animal inputs in plant-based products, in the manufacture, processing, and packing of:
 - processed foods, both own brand and customer branded
 - ingredients for use by food service companies, catering companies, and food manufacturers
 - pet foods (GFSI benchmarked schemes only)
 - natural health products.

Voluntary Additional Modules

- Additional Module 11 Meat Supply Chain Assurance: is applicable to meat processing facilities who wish to demonstrate to customers an increased transparency of their meat supply chains and verification of authenticity. It includes an in-depth verification of traceability of the meat supply chain and processes to prevent contamination between meat species.
- Additional Module 13 Food Safety Modernization Act (FSMA): is specifically designed to assist sites in
 understanding, meeting and providing verification to customers that those prescriptive elements within the
 Preventive Controls portion of FSMA are detailed in the audit and report. This preparedness assessment is
 essential for any site currently, or interested in, doing business with US-based customers.

1.4 Certificate and Certification Cycle

Certificates will be issued to the manufacturing site that meets the requirements of the Standards and in accordance with the requirements of the BRCGS Certification protocol. The certificate remains the property of QMSCERT and is issued to the client complying with the Certification Terms/Contract. The validity of the certificate begins with the date of the certification decision. The re-audit date is based on the grade achieved and shall be 6 or 12 months from the initial audit date. The Initial audit date is the first day of the assessment.

For an announced audit and blended audits, successful sites are awarded a certificate with a grade of AA, A, B, C, or D, depending on the number and type of non-conformities identified. For unannounced audits, successful sites will

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receive an unannounced grade of AA+, A+, B+ C+ or D+, depending on the number and type of non-conformities identified.

1.5 Certification Process

- Select an audit option {announced, unannounced or blended audits}
- Self-assessment of compliance with the BRCGS Global Standard. The Standard(s) should be read and understood, and a preliminary self-assessment should be conducted by the company against the Standard(s) to prepare for the audit.
- Selection of QMSCERT as certification body
- Company and QMSCERT contractual arrangements: A contract (F-2002) shall exist between the company and the QMSCERT in accordance with the requirements of ISO/IEC 17065, and the BRCGS Standards
- Completed application form send to QMSCERT by the company
- Application review by QMSCERT to confirm the scope of audit, any exclusion from the scope, the BRCGS categories, the additional module, if any, and define the audit duration.
- Auditor selection.
- Scheduled audit dates. It is important that the activities to be certified are in operation at the time of the audit. Additionally:

Assessments will usually be conducted in local languages. In cases where the auditor's language is not the same as the language spoken by the company or the company's system, an approved translator will be used. Extra time for translation will be considered; usually, 20% extra time will be added to the calculated audit time.

Assessments consist of eight elements:

- Opening meeting
- Production facility inspection (not facility inspection for BRCGS Agents & Brokers) (50% of the audit duration or
 4-6 hours is typically spent within production sites) and review of production facility inspection.
- Document review
- Label review (only for BRCGS Food Safety)
- Vehicle audit (only for BRCGS Storage & Distribution where applicable)
- Traceability challenge
- Final review of findings by the auditor in preparation for the closing meeting.
- Closing meeting.

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It is expected that at the opening and closing meetings, those attending on behalf of the company will be managers who have the appropriate authority to ensure that corrective action can be progressed if nonconformities are found.

Where a company has several manufacturing sites (food/packaging) all of which are operating to a centralized system managed at the Head Office (HO), a separate uncertified audit of the HO function may be undertaken. Separate manufacturing units which are part of the same manufacturing process may be audited as part of a single audit and included in the scope and certificate.

The assessor will prepare a copy of the assessment summary, deviations, and non-conformances, which are left with the company's technical representative on the last day of the assessment or in exceptional circumstances provided within 1 day of the assessment. A signed copy of the non-conformity summary sheet will be requested by the company.

Findings Classification

Minor Non-conformity

Where a clause has not been fully met but based on objective evidence, the conformity of the product is not in doubt.

Major Non-conformity

Where there is a substantial failure to meet the requirements of a statement of intent or any clause of the Standard, or where a situation is identified which would based on available objective evidence, raise significant doubt as to the conformity of the product or services being supplied.

Critical

Where there is a critical failure to comply with a product safety or legal compliance issue.

1.5.1 Combined audit with IFS or another Standard with BRCGS

It is possible to combine a BRCGS audit with an IFS audit/ or another Standard. In this case:

- The requirements of both standards are simultaneously audited in one audit.
- The audit is carried out under the same conditions for both standards.
- Additional audit time added to the audit duration.

1.6 Transfer of certification

The client has the right to request a change of CB during the period of validity of its certificate.

QMSCERT is obliged to provide all the necessary documents for the transfer of certification directly to the new CB, and vice versa.

In case a company wants to transfer its BRCGS certification to QMSCERT:

 QMSCERT is obligated to review the transferred certification after the client has sent the signed application form and contract.

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- QMSCERT sends a sharing request to BRCGS ask to gain access to company and site details in BRCGS Directory.
- If QMSCERT decides not to accept the certification, a new certification audit needs to be conducted.
- If the certification is accepted, it must still be ensured that QMSCERT continues to monitor the implementation of the corrective actions or that the change of the CB.
- The regulations regarding unannounced audits must be taken into account by QMSCERT.
- If there are major or fundamental evaluations that have not been corrected at the time of the change of CB, a new certification audit needs to be conducted.

1.7 Maintaining Certification

It is the client's responsibility to maintain certification, except in the case of unannounced audits. The issue of the certificate provides an assurance to customers that QMSCERT has assessed the certified site and is satisfied that the requirements of the BRCGS Standard(s) have been met through the audit and any corrective actions implemented. In addition, that processes are in place to ensure that the Standard is maintained for at least the duration of the certificate. The audit must be conducted on, or before, the audit due date. If the audit is late due to the client's negligence, Major non-conformity will be raised.

1.8 Technical Review and Certification Decision

The audit report will be submitted by the auditor in full to the QMSCERT Certification Manager for review. The company may be contacted for clarification if needed. The decision to award certification will be taken independently of the auditor following a review of the assessment report and any documented action plans provided or re-visit corrective action verification provided, independently by QMSCERT Certifications Managers. QMSCERT is required to make a certification decision within 7 weeks from the date of the audit.

2. APPLICANT'S OBLIGATIONS

Corrective Actions

The client must send to QMSCERT's email <u>postaudit@qmscert.com</u>, the completed action plan and the evidence for the closure of any identified non-conformities within 28 days of the end of the audit.

The corrective action section should be completed in English. The client must:

- Link the evidence attached to the non-conformity number or clause
- Include a description of each corrective action have taken

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- Include the details of the evidence submitted to support the action taken e.g., the document number / file name etc.
- Complete all parts of the form, except the final column marked for QMSCERT use.
- Submit evidence that is comprehensive and detailed as if requested and inspected during an audit.
- Accompany a new or updated procedure is being submitted as documentary evidence it should be by any
 associated documentation such as evidence of the procedure being issued and evidence of training, if
 appropriate.
- Consider examples of associated documentation such completed production records, audit reports, nonconformance reports, training records etc.
- Send, where appropriate, certificates, invoices, and contractor records may be submitted.
- Use photographic evidence where changes required are physical or structural then.
- Translate the title of documentary evidence in English when not submitted in English.
- If it is not possible to complete corrective action within 28 days, then an alternative strategy needs to be
 put in place to close the nonconformity until such time as the permanent corrective action can be
 completed.

Incident/ product recall

The client must notify QMSCERT of a product safety incident within 3 working days of the date incident/product recall and if necessary, the authorities. The only exceptions are for sites certificated to the Gluten-free standard where the site must notify BRCGS at compliance@brcgs.com and the Certification Body within 1 working day of the recall date and the Plant-Based standard where the site must notify the Certification Body within 1 working day of the recall date.

Sites are responsible for investigating and subsequently providing the details including the Corrective Action, Root Cause Analysis, and Preventative Action Plan to the Certification Body

The Client must also inform QMSCERT when:

- There are changes in ownership, structure, or management personnel.
- There is any significant change to the operation or scope.
- There is evidence that leads to the conclusion that the client doesn't fulfill the requirements of the scheme.
- Significant staff changes or prolonged shutdowns (e.g., considerable staff losses or the loss of key product safety roles).

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In case of unannounced audits

- The decision for unannounced audit option must be communicated between the client and QMSCERT within 3
 months of the previous audit to ensure that the site is aware of the year in which the unannounced audit will
 take place.
- The auditor upon arrival on-site shall be granted immediate access.
- Factory inspection will start within 30 minutes of arrival, following a brief opening meeting.
- Auditor must be able to access to all documents, records, personal information, etc.
- If key staff are absent competent, knowledgeable deputies must be available for interviews and to assist with the audit processes.
- Where justified, a site may select up to 10 days when an audit cannot take place (for example, due to a customer visit). These non-audit days must be notified to the certification body in advance of the audit.

3. QMSCERT'S OBLIGATIONS

- must send the audit plan to the client's management before the audit day.
- will not inform the client about the visit in case of an unannounced audit.

If the client refuses to have an unannounced audit conducted, QMSCERT will decide whether the refusal is justified. In case the refusal is unjustified, QMSCERT must suspend the certificate.

- must upload the Audit Report and Certificate to BRCGS Directory within a maximum of 49 days from the audit date. If the implementation of corrective actions is not conducted appropriately and on time (28 days from the audit) by the client, QMSCERT:
- Must decide whether the granted certification needs to be withdrawn.
- Will inform BRCGS about the late corrective actions submitted.
- will send to the client the uploaded final audit report, as well as the client access to site records via BRCGS Directory.
- informs the client on time and in writing if there are changes during the review of the audit report.
- must change the certificate status to the BRCGS Directory in case of certificate is withdrawn or suspended.
- is responsible for informing the client about the costs of the whole process, as they are determined by BRCGS and QMSCERT. If a further visit to its premises is needed to prove the closure of a non-conformance, there may be a new charge.
- can issue a certificate only when a positive certification decision is granted by Certification Manager.

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In case QMSCERT wants to end its Accreditation, or in case, it loses its BRCGS accreditation, must inform its clients

in writing that they must undergo the certification process again or transfer their certification to another CB.

QMSCERT must also inform its Accreditation Body.

Only authorized members of the system have access to the data such as the client, QMSCERT, and the auditor.

4. USE OF BRCGS LOGO

Companies that achieve BRCGS Global Standards certification and have no exclusions from their scope are qualified to

use the BRCGS Global Standards logo on site stationery and other marketing materials. BRCGS Global Standard "Food"

logo cannot be used for promoting traded products even when they form part of the certificated scope.

BRCGS Logo request form https://form.jotform.com/61323530244949.

The BRCGS logo is not a product certification mark and shall not be used on products or product packaging. Any

certificated site found to be misusing the mark will be subject to the BRCGS complaints/referral process and may risk

suspension or removal of its certification.

5. COMPLAINTS AND APPEALS

QMSCERT operates a documented complaints and appeals procedure as part of the quality system. Complaints and

appeals must be made in writing, within 7 calendar days of receipt of the certification decision, by the named

person(s) and addressed to the Quality Manager, QMSCERT, Vlasiou Gavriilidi 28, Thessaloniki 54627, Greece.

6. SURVEILLANCE OF CERTIFICATED COMPANIES

For certificated companies, where appropriate, the certification body or the BRCGS may carry out further audits or

question activities to validate continued certification at any time. These visits may take the form of announced or

unannounced visits to undertake either a full or partial audit. Refusal of access to the site may affect certification status.

Any change in certification status shall be notified to the BRCGS by the certification body and the status in the BRCGS

Global Standards Directory amended accordingly.

Revision No	Revision Date	Nature of Change	Review and Approval
0	01/09/2018	Original Issue	KD/LDK
1	07/09/2018	Revised to include all BRCGS standards	PD
2	20/9/2018	Added CA guidance for the customer	LDK
3	15/04/2019	Revised to include BRCGS Storage & Distribution, BRCGS Logos, Surveillance of certified companies	LDK/AK
4	06/05/2020	Revised to correct the BRCGS Packaging audit duration and communication with CB paragraph.	LDK/AK
5	April 5, 2021	Changes regarding BRCGS Storage and Distribution new requirements (v4)	VN
6	March 14, 2022	Revised to include Blended Audit Option and link for BRCGS logos.	LDK/AK
7	January 4, 2023	Revised to include the GFCP and Plant Based certification and to change the 4 months cycle in the unannounced audits according to new version Food 9. Additionally, the procedure was transferred to the new QMSCERT format template.	LDK/AK