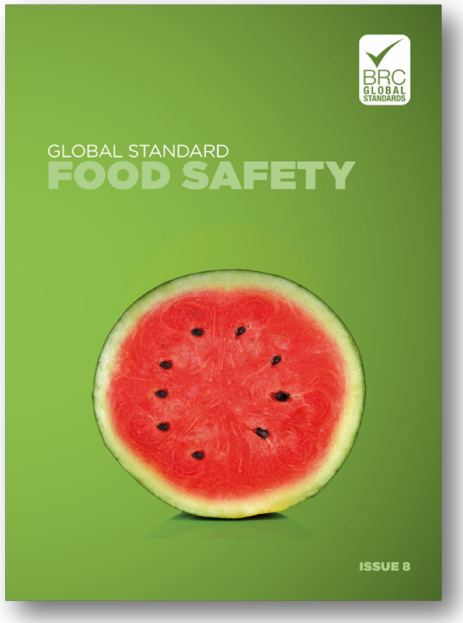
BRC Global Standards Safe Food for Canadians Act and Food Version 8

John Kukoly
Americas Director
BRC Global Standards



SFC Basics

For producers

- Licensing
- Preventive controls
- Traceability

For imported products

- Licensing
- Recall plan
- Preventive controls verification
- Recognition of third-party certifications

Considerations

Your position

Your competition

Your supply chain

Your customers

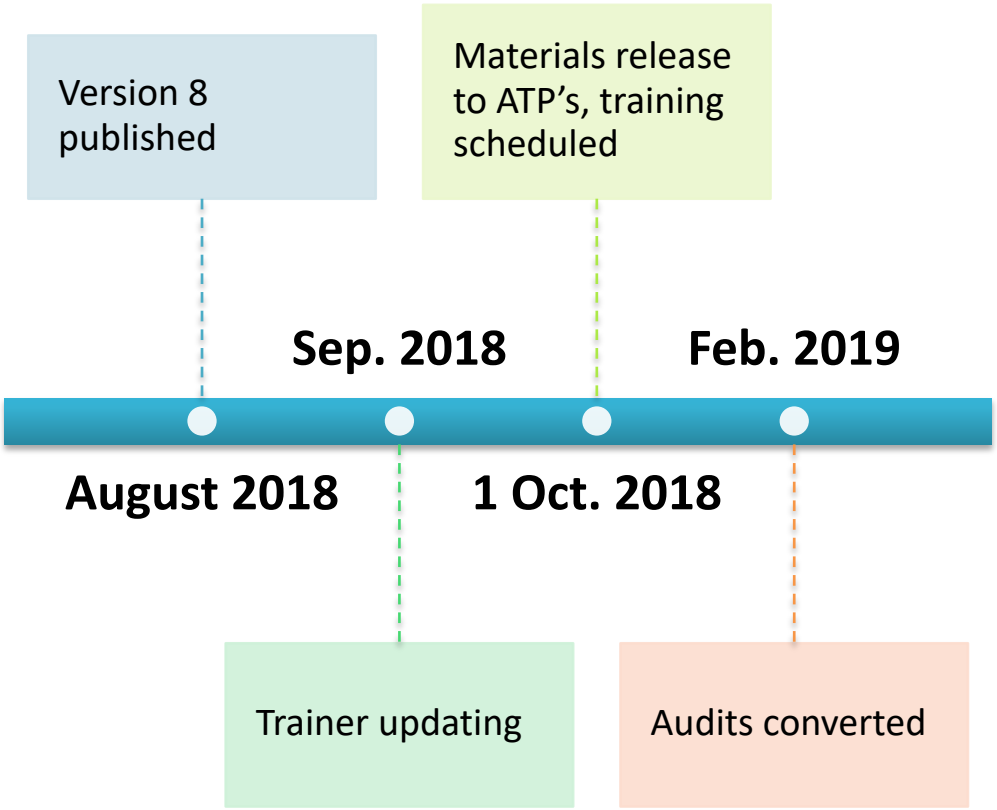
Background to Issue 8

The consultation and review of emerging food safety concerns identified a number of opportunities for further development since the publication of Issue 7.

Therefore the key objectives were identified as:

- align Issue 8 with the proposed GFSI benchmark requirements
  - environmental monitoring
  - food defence/product security
- continue activities to reduce the burden of duplicate, private audits of certificated sites
- consider any potential implications of global regulations
- consider the practicalities of including product safety culture within the Standard
- review issues, incidents & recalls

Food 8 Timing



Management Commitment

INCREASED IMPORTANCE AND FOCUS DURING THE AUDIT.

INTERVIEWS WITH SENIOR MANAGEMENT

FOOD SAFETY AND QUALITY CULTURE AND OBJECTIVE SETTING

Food Safety Culture

Background & Objective

- Food safety culture is a fundamental factor in the management of product safety
- While challenging to audit, it is important that food safety culture is considered within a site and therefore within the requirements of the Standard

Requirement

- Sites shall plan to maintain and develop product safety and quality culture within the business

1.1.2	The site's senior management shall define and maintain a clear plan for the development and continuing improvement of a food safety and quality culture. This shall include: • defined activities involving all sections of the site that have an impact on product safety • an action plan indicating how the activities will be undertaken and measured, and the intended timescales • a review of the effectiveness of completed activities.

Auditors will **NOT** be attempting to audit the culture of the site but will be looking at how sites have implemented the bullet points. Effectiveness will be assessed only on the 2nd issue 8 audit

Reporting Issues

Background & Objective

- Product safety is the responsibility of all staff – not just a select few
- Therefore all staff need to know how to report concerns and incidents

Requirements

- Clause 1.1.5 amended – staff understanding importance
- Clause 1.1.6 added – confidential reporting system needed

1.1.5	The site shall have a demonstrable meeting programme which enables food safety, legality, integrity and quality issues to be brought to the attention of senior management. These meetings shall occur at least monthly. Employees shall be aware of the need to report any evidence of unsafe or out of specification product or raw materials, to a designated manager to enable the resolution of issues requiring immediate action.

1.1.6	The company shall have a confidential reporting system to enable staff to report concerns relating to product safety, integrity, quality and legality. The mechanism (e.g. the relevant telephone number) for reporting concerns must be clearly communicated to staff. The company's senior management shall have a process for assessing any concerns raised. Records of the assessment, and where appropriate actions taken, shall be documented.

HACCP/Food Safety Plan

Background & Objective

- Some countries (e.g. the Canada, USA) have regulatory requirements that incorporate all HACCP processes outlined by Codex Alimentarius but use different terminology.
- Review wording for section 2 of the Standard on the HACCP Food Safety Plan to ensure compatible in all countries and geographies.

Requirements

- Sites are required to meet the requirements of the Standard - specific terminology should not be an impediment to demonstrating compliance.

Supplier Approval

Background & Objective

- Safety, integrity, legality and quality of raw materials are fundamental to the site's operations
- GFSI benchmarking

Requirements

- All of the requirements reviewed and updated to ensure rigorous control controls of raw materials whilst maintaining practical application

3.5.1.1	The company shall undertake a documented risk assessment of each raw material or group of raw materials including primary packaging to identify potential risks to product safety, legality and quality. This shall take into account the potential for: • allergen contamination • foreign-body risks • microbiological contamination • chemical contamination • variety or species cross-contamination • substitution or fraud (see clause 5.4.2) • any risks associated with raw materials which are subject to legislative control. Consideration shall also be given to the significance of a raw material to the quality of the final product. The risk assessment shall form the basis for the raw material acceptance and testing procedure and for the processes adopted for supplier approval and monitoring. The risk assessment for a raw material shall be updated: • when there is a change in a raw material, the processing of a raw material, or the supplier of a raw material • if a new risk emerges • following a product recall or withdrawal, where a specific raw material has been implicated • at least every 3 years.

Primary packaging	The packaging which constitutes the unit of sale to the consumer or customer (e.g. bottle, closure and label of a retail pack or a raw material bulk container).

3.5.1.2	The company shall have a documented supplier approval procedure to ensure that all suppliers of raw materials, including primary packaging, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval procedure shall be based on risk and include one or a combination of: • valid certification to the applicable BRC Global Standard or GFSI-benchmarked standard. The scope of the certification shall include the raw materials purchased **or** • supplier audits, with a scope to include product safety, traceability, HACCP review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor. Where this supplier audit is completed by a second or third party, the company shall be able to: – demonstrate the competency of the auditor – confirm that the scope of the audit includes product safety, traceability, HACCP review and good manufacturing practices – obtain and review a copy of the full audit report. or For suppliers assessed as low risk only, and where a valid risk-based justification is provided, initial approval may be based on a completed supplier questionnaire, with a scope that includes product safety, traceability, HACCP review and good manufacturing practices. This questionnaire shall have been reviewed and verified by a demonstrably competent person.

4.2.1	The company shall undertake a documented risk assessment (threat assessment) of the potential risks to products from any deliberate attempt to inflict contamination or damage. This threat assessment shall include both internal and external threats. The output from this assessment shall be a documented threat assessment plan. This plan shall be kept under review to reflect changing circumstances and market intelligence. It shall be formally reviewed at least annually and whenever: • a new risk emerges (e.g. a new threat is publicised or identified) • an incident occurs, where product security or food defence is implicated.
4.2.2	Where raw materials or products are identified as being at particular risk, the threat assessment plan shall include controls to mitigate these risks. Where prevention is not sufficient or possible, systems shall be in place to identify any tampering. These controls shall be monitored, the results documented, and be subject to review at least annually.
4.2.3	Areas where a significant risk is identified shall be defined, monitored and controlled. These shall include external storage and intake points for products and raw materials (including packaging). Policies and systems shall be in place to ensure that only authorised personnel have access to production and storage areas, and that access to the site by employees, contractors and visitors is controlled. A visitor recording system shall be in place. Staff shall be trained in site security procedures and food defence.
4.2.4	Where required by legislation, the site shall maintain appropriate registrations with the relevant authorities.

Environmental Monitoring

Objective

- Introduce an important tool for identifying potential contamination risks
- Sites to develop a rigorous monitoring programme, enabling timely corrective action before product contamination occurs

Requirements

- Monitoring of all factory production areas as a minimum areas with open ready to eat products
- Risk based programme developed
- Pathogens, spoilage organisms and/or indicator organisms should be considered

Environmental Monitoring

4.11.8 ENVIRONMENTAL MONITORING

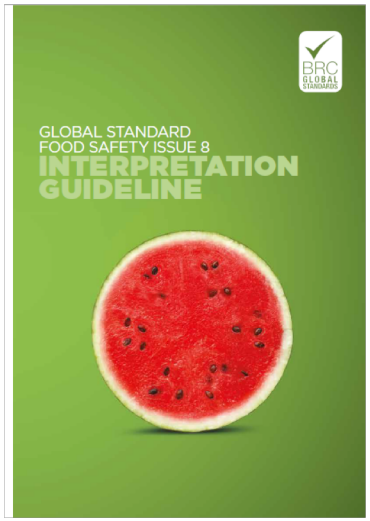
Risk-based environmental monitoring programmes shall be in place for pathogens or spoilage organisms. At a minimum, these shall include all production areas with open and ready-to-eat products.

4.11.8.1 Program designed properly
4.11.8.2 Appropriate limits and corrective actions
4.11.8.3 Review triggers

4.11.8.1	The design of the environmental monitoring programme shall be based on risk, and as a minimum include: • sampling protocol • identification of sample locations • frequency of tests • target organism(s) • test methods (e.g. settle plates, rapid testing, swabs) • recording and evaluation of results The programme and associated procedures shall be documented.

5.6.2.5	The significance of laboratory results shall be understood and acted upon accordingly. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends. Where legal limits apply these shall be understood and appropriate action implemented promptly to address any exceedance of these limits.

4.11.8.3	The company shall review the environmental monitoring programme at least annually and whenever: • changes in processing conditions, process flow or equipment • new developments in scientific information • failure of the programme to identify a significant issue (e.g. regulatory authority testing identifies positive results which the site programme has not) • product failure (products with positive tests) that are not identified in the environmental monitoring programme (i.e. if product tests give positive pathogen results then the programme should be reviewed to ensure that it remains effective) • extensive lack of positive results (i.e. a site with a long history of negative results should review the programme, for example to consider whether the correct parts of the factory are correctly tested, for the appropriate organisms, etc).



Where to find help

- Training suppliers – here today
- Interpretation Guideline
- Key Changes Document
- FAQs – Published October onwards
- ‘Understanding’ Guidelines (22 for Issue 8)

Global Markets – Food Targeting very small, and developing suppliers

- New auditor requirements
  - Field of Audit, no categories
  - 2 years experience
  - 2 training audits
- Reduced cost
- New protocol
  - Auditors able to provide guidance for improvement
- Launch late September

BRC GS also….

GFCP AUDIT & CERTIFICATION

What To Do

Use the CFIA website tools, learn

Identify were you need, and want to be, train, upskill

Complete alignment

You

Your suppliers

Prepare your evidence

CFIA

Your customers


FOOD SAFETY AMERICAS 2019
CONSUMING CHALLENGES
MAY 21-22, 2019
Loews Coronado Bay, San Diego, California
brcglobalstandards.com/events