



SPECIAL RULES FOR THE ISSUE AND MAINTENANCE OF CERTIFICATION TO BRC GLOBAL STANDARD for FOOD SAFETY

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Art. 1 Subject of the Regulation

This Regulation establishes the procedures applied by CSICERT System to manage the certification scheme for production processes of Organizations in accordance with the requirements of BRC Global Standard for Food Safety issued by British Retail Consortium (BRC).

This regulation defines the supplementary conditions and procedures for this specific plan in addition to those already set forth in the following documents:

- "General regulations regarding product certification (Reg. prod. 001/04)";
- "Product conformity certification procedure (PR 60B)";
- "Regulation regarding the use of product/service certification logos";

Hence, these documents fully apply to this plan except for the changes set forth in this regulation.

Art. 2 Reference documents

2.1 BRC Global Standard for Food Safety requirements

Requirements that Organizations must meet to obtain the certificate addressed in these Special Rules are explained in detail in the technical norm of BRC Global Standard for Food Safety (current issue), issued by British Retail Consortium (BRC). This standard represents the reference standard for European large-scale retail-trade organizations.

The BRC Global Standard for Food Safety sets out the requirements for the manufacture of processed foods and the preparation of primary products supplied as retailer-branded products, branded food products and food or ingredients for use by food service companies, catering companies and food manufacturers. Certification will only apply to products that have been manufactured or prepared at the site where the audit has taken place and will include storage facilities that are under the direct control of the production site management.

The Standard shall not apply to food products which do not undergo any process at the site audited or to activities relating to wholesale, importation, distribution or storage outside the direct control of the company.

2.2 Certification scheme references

CSICERT takes the following documents into consideration while applying this certification scheme:

- **BRC Global Standard for Food Safety (current issue)**
- **BRC POSITION STATEMENTS and GUIDANCE NOTES (current issue)**

Art. 3 Special rules

3.1 Choosing product category

Although BRC Global Standard for Food Safety is not a technical standard structured for product sectors, it classifies products and corresponding processes, that can be subject to certification, under categories described within the BRC Global Standard for Food Safety Appendix 6: product categories and described as follows:

- 1 Raw red meat
- 2 Raw Poultry
- 3 Raw prepared products (meat and vegetarian)
- 4 Raw fish products and preparations
- 5 Fruit, vegetables and nuts
- 6 Prepared fruit, vegetables and nuts
- 7 Dairy, liquid egg
- 8 Cooked meat/fish products
- 9 Raw cured and/or fermented meat and fish
- 10 Ready meals and sandwiches, ready-to-eat desserts
- 11 Low/high acid in cans/glass
- 12 Beverages
- 13 Alcoholic drinks and fermented/brewed products
- 14 Bakery
- 15 Dried foods and ingredients
- 16 Confectionery
- 17 Cereals and snacks
- 18 Oils and fats

3.2 Prices

CSICERT elaborates and sends a specific offer to every company which requests quotation, complete with all the information concerning technical aspects and prices. Monetary terms are established according to CSICERT price list.

3.3 BRC standard conformity conditions

When the Company to be certified submits its application, it commits itself to fulfilling all the special rules and reference documents that apply (see art. 2) to the certification to BRC Global Standard for Food Safety and meeting all of its requirements. Furthermore, the organization must meet all applicable requirements set forth by the reference standards.

The Global Standard for Food Safety requires the development of and compliance with the following:

- Senior Management Commitment
- A HACCP plan
- A Quality Management System
- Prerequisite Programmes

These elements are organized within the technical standard under 7 chapters, namely the following:

Chapter 1	Senior Management commitment
Chapter 2.	The Food Safety Plan - HACCP
Chapter 3.	Food Safety and Quality Management System
Chapter 4	Site Standards
Chapter 5.	Product control
Chapter 6.	Process control
Chapter 7.	Personnel

Each chapter consists of sections, which are in turn structured in requirements. The requirements within the Standard have been colour coded to provide a guide as to which clauses would be expected to be audited as part of the assessment of the production areas and facilities and which clauses would be considered at the document and records audit.

In the standard 10 key requirements are also identified, which must be continuously maintained and monitored by the Organization, namely:

Req. 1.1	Senior Management Commitment and continual improvement
Req. 2	The food safety plan – HACCP
Req. 3.4	Internal audits
Req. 3.5.1	Management of suppliers of raw materials and packaging
Req. 3.7	Corrective and preventive actions
Req. 3.9	Traceability
Req. 4.3	Layout, product flow and segregation
Req. 4.11	Housekeeping and hygiene
Req. 5.3	Management of allergens
Req. 6.1	Control of operations
Req. 6.2	Labelling and pack control
Req. 7.1	Training: raw material handling, preparation, processing, packing and storage areas

Failure to comply with the statement of intent of a fundamental requirement (i.e. a major non conformity) leads to non-certification at an initial audit or withdrawal of certification at subsequent audits. This will require a further full audit to establish demonstrable evidence of compliance.

3.4 Non conformity classification

BRC Global Standard for Food Safety defines 3 non conformity levels:

Critical: where there is a critical failure to comply with a food safety or legal issue

Major: where there is a substantial failure to meet the requirements of a "Statement of Intent" or any clause of the Standard or a situation is identified which would, on the basis of available objective evidence, raise significant doubt as to the conformity of the product being supplied

Minor: where a clause has not been fully met but, on the basis of objective evidence, the conformity of the product is not in doubt.

The audit results are to be considered preliminary as far as the assessment results for certification purposes are concerned. As a matter of fact, it is the CSICERT Certification Committee that shall decide whether to issue a certificate based on the outcome reported on the BRC assessment report as well as corrective actions and proofs given by the Organization.

3.5 Certification process

When the Company accepts the proposal, arrangements are put in place to define the dates when the certification activities are going to be performed.

On site audit duration is defined according to BRC document F038 Audit duration calculation (current issue).

Furthermore, it is possible to perform consecutive and/or combined audits.

Certification combined audit with IFS Food Standard: in this situation, additional on site time has to be considered for calculation.

Certification consecutive audits with ISO 9001 and ISO 22000 Standards: in this situation audit duration depends according to each single certification protocol.

3.5.1 Global Markets Programme

The programme is designed for sites which are either very small and for which the full Standard may not be appropriate or for sites which are in the development process of their food safety management systems.

The programme is based on the principles of the GFSI Global Markets Programme and it allows an audit and recognition of attainment of compliance at two levels (Basic and Intermediate), below full certification.

3.5.2 Announced audit programme

This is available for all sites; the audit date is agreed with the Certification Body in advance of the audit and all requirements of the Standard are audited within the audit visit. This is the most commonly selected certification audit type. Successful sites award a certificate with the grade **AA, A, B, C or D**, depending on the number and type of non-conformities identified.

3.5.3 Unannounced audit programme

The unannounced audit options are available to all sites although sites which are not currently certificated need to recognize that the audit may not take place for up to 1 year from the date of application.

The unannounced audit options provide sites with the opportunity to demonstrate the maturity of their quality systems and successful sites are awarded grades of AA+ (the top BRC grade), A+, B+, C+ or D+. The conducting of an independent, unannounced review of systems and procedures under this scheme provides a company's customers with added confidence in the company's ability to consistently maintain standards. This may influence the frequency of customer audits, where conducted, and other performance procedures applied by the customer.

There are two options for unannounced audits, which allows companies to decide the one best suited to their business requirements; the grading and reporting for each is the same. With both options the date of the audit of the factory good manufacturing processes (GMPs) is unannounced.

For option 1, the whole Standard is audited on a single unannounced audit visit, typically lasting two days.

For option 2, the audit visit is split into two separate visits, each typically lasting one day. The first visit, which is unannounced, audits predominantly factory GMPs, as highlighted by the colour-coding system in the Standard requirements. The second part of the audit, which is planned, audits predominantly the documented systems and records.

3.5.4 Initial certification audit

The following tasks are to be performed in the following order:

- initial meeting;
- document analysis;
- audit on the site and the structure;
- audit on the production units;
- final meeting.

At the final meeting, the Lead auditor of the assessment group informs the Organization of the outcome of the audit and gives explanations as to the result thereof.

3.6 Evaluation report

Audits results are formalized in a special BRC Global Standard for Food Safety evaluation report. The audit report assist the reader to be informed of:

- the food safety controls in place and improvements since the last audit
- 'best practice' systems, procedures, equipment or fabrication in place
- non-conformities, the corrective action taken and plans to correct the root cause.

Before issuing the audit report, CSICERT issues a corrective actions plan for the Organization during the audit or no later than the following deadlines, which contains instructions regarding the deviation and/or Non conformity encountered, if applicable, and their classification.

Certification process management follows the timeline below:

CSICERT sends the corrective actions plan no later than 1 day following the audit; Organization draws up the proposal for corrective actions, the corrective actions and concerning evidence no later than 28 days following the audit;

CSICERT assesses the proposals submitted and adds them to the assessment plan no later than 42 days following the audit. Within this time CSICERT issue the detailed evaluation report

The evaluation report is a document of ownership of the Organization and may not be delivered to third parties, unless authorized by that Organization.

3.7 Issuance of certificate and authorisation to use the certification logo

Based on BRC Global Standard for Food Safety requirements, the decision whether or not to issue the certificate is taken depending on the type of "non conformities" encountered, depending on the following summary chart (Table 1.)

Inside table is also indicated for each case study, the relevant assets charged to the organization and CSICERT.

Typology NC	Decision	Activity in charge to auditee	Activity in charge to certification body (CSICERT)
CRITICAL Requirement FUNDAMENTAL	Critical non-compliances do not allow the issuance of the certificate of conformity.	The organization must formulate and take appropriate corrective action.	Certification is not granted. Making a complete additional assessment.
MAJOR FUNDAMENTAL Requirement	Major Non-conformities do not allow the issuance of the certificate of conformity.	The organization must formulate and take appropriate corrective action.	Certification is not granted. Making a complete additional assessment
MAJOR NO FUNDAMENTAL Requirement	Major non conformities do not allow the issuance of the certificate of conformity till closure	The Organisation must submit the draft resolution and implement corrective actions within 28 days from the date of the audit.	Evaluation of NC proposals resolution Evaluation of corrective actions taken (evidence of implementation). Note: The verification of the correct implementation of CA can be carried out by the CB including documents, without the need for further inspection. Decision on the certification within 42 days from the date of initial inspection.
MINOR	Minor non conformities do not allow the issuance of the certificate of conformity till closure	The Organisation must submit the draft resolution and implement corrective actions within 28 days from the date of the audit.	Evaluation of NC proposals resolution Evaluation of corrective actions taken (evidence of implementation CA). Note: The verification of the correct implementation of CA can be carried out by the CB including documents, without the need for further inspection. Decision on the certification within 42 days from the date of initial inspection

BRC Global Standard for Food Safety certificate of conformity certifies the conformity of the Organization's production processes to the requirements set forth in BRC Global Standard for Food Safety

It is issued in English and states in particular the level of conformity reached by the Organization (GRADE) and the subsequent period of validity.

Table 1 shows the criterion for determining the compliance level (grade). Certificates of conformity issued remain the property of CSICERT.

GRADE Announced audit	GRADE Unannounced audit	CRITICAL NC	MAJOR NC	MINOR NC	CORRECTIVE ACTION	AUDIT FREQUENCY
AA	AA+	-	-	Up to 5	Evidence within 28 days	12 months
A	A+	-	-	6 to 10	Evidence within 28 days	12 months
B	B+	-	-	11 to 16	Evidence within 28 days	12 months
B	B+	-	1	Up to 10	Evidence within 28 days	12 months
C	C+	-	-	17 to 24	Evidence within 28 days	6 months
C	C+	-	1	11 t 16	Evidence within 28 days	6 months
C	C+	-	2	Up to 10	Evidence within 28 days	6 months
D	D+	-	-	25 to 30	Evidence within 28 days	6 months
D	D+	-	1	17 to 24	Evidence within 28 days	6 months
D	D+	-	2	11 to 16	Evidence within 28 days	6 months
Certification not granted		1 or more	-	-	Necessary repeat the audit	-
Certification not granted			1 or more (Fundamental Req.)	-	Necessary repeat the audit	-
Certification not granted		-	-	31 or more	Necessary repeat the audit	-
Certification not granted		-	1	25 or more	Necessary repeat the audit	-
Certification not granted		-	2	17 or more	Necessary repeat the audit	-
Certification not granted		-	3 or more	-	Necessary repeat the audit	-

Tabella formattata

table 1

Information about certificated companies is provided to the BRC by Certification Bodies.

The Directory www.brcdirectory.com provides the following publicly available facilities:

a searchable list of certificated companies, including contact details, the Standard against which they are certified, scope and links to their website

a searchable list of approved Certification Bodies, including local offices and contact details.

Note that whilst all reports and certificate details shall be uploaded onto the Directory, companies may choose not to appear on the public directory site if they so wish; this will not, however, exempt sites from the registration fee.

The Global Standards Directory provides additional functionality to key user groups, including companies, retailers and Certification Bodies. This includes user-specific access to certification information, audit reports and management reporting, further enhancing the value of obtaining BRC certification.

The logo that the certified organization may be used and their rules are established by the British Retail Consortium (BRC). Information relating to the above are available at www.brcdirectory.com

3.8 Renewal Audits

According to BRC Global Standard for Food Safety renewal and re-certification audits are performed in accordance with the provisions of article 3 – Special Rules. Certification re-audit due date is always calculated from the date of the audit, adding the estimated time (6 or 12 months, depending on the level of compliance achieved). It is responsibility of the site maintain certification by ensuring that announced certification audits occur on or before the reaudit due date indicated on the certificate.

3.9 Sanction

Apart from the provisions of the general rules (Reg. prod. 001/04), the following apply: after the certificate is issued, CSICERT shall take the following measures, in case the conditions defined below arise. The organization under certification is supposed to inform all of its clients of the measures taken, as set forth by the reference standards.

3.9.1 Suspension of the certificate

The certificate will be suspended under the following circumstances:

- In case of non-conformities classified as CRITICAL for FUNDAMENTAL requirement
- In case of non-conformities classified as CRITICAL for NON FUNDAMENTAL requirement
- In case of non-conformities classified as MAJOR for FUNDAMENTAL requirement

3.9.2 Withdrawal of the certificate

Withdrawal of the certificate means that the company is barred from using the certificate and certification logo completely and definitively and it occurs under the following conditions:

- Reasons amounting to temporary suspension
- Company closure

3.10 Surveillance of Certificated Companies

For certificated companies, where appropriate, the Certification Body or the BRC 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 part audit.

Any non-conformities identified at a visit must be corrected and closed out within the normal protocol (i.e. within 28 days of the visit), and reviewed and accepted by the Certification Body. If there is no intention on behalf of the company to take appropriate corrective actions or the corrective actions are deemed inappropriate, certification shall be withdrawn. The ultimate decision to suspend or withdraw certification remains with the Certification Body. Any change in certification status shall be notified to the BRC by the Certification Body and the status on the BRC Directory amended accordingly.

3.11 CSI spa clients complaints management and appeals

CSICERT QM procedure are in place for consideration and resolution of appeals against the results of an audit. These procedures are independent of the individual auditor and will be

considered by senior management of the certification body. Appeals will be finalised within 20 working days of receiving information from the auditee.

CSICERT QM procedure are in place for handling complaints received from the companies and/or other relevant parties. An initial response will be given within ten (10) working days of receiving the complaint. A letter confirming receipt of the complaint will be issued within a maximum of five (5) working days. A full written response will be given after the completion of a full and thorough investigation into a complaint.

For the handling of complaints received by the BRC offices, the basis for the complaint management is as following :

If the complaint relates to the quality of the content of BRC audits or BRC audit reports, the certification body will provide a statement on the cause and the measures introduced to rectify the problem within 2 weeks.

If the complaint relates to administrative errors, e.g. in BRC audit reports, BRC certificates or in the BRC database, the certification body will provide a statement and rectify the problem within one (1) week. The statement shall be issued in writing by email or post.

3.12 Communication with certification body

The organization has a responsibility to inform the certification body if between two certification audits were activated or introduced new processes or products other than those included in the scope of certification. After that certification body will perform a risk assessment to decide whether or not an audit is required

The organization has a responsibility to inform the certification body with respect to any changes or information indicating that the product / process does not meet the requirements of the certification system (e.g., RECALL, ALERT, etc.). This information will be done to the certification within 3 working days

Art. 4 Exceptions to the confidentiality clause

It being understood that the confidentiality clause is to be applied at all times, in case of particular legal actions, BRC might require to CSICERT as an expert witness. In that case, the company under certification grants CSICERT with the right to fulfill this role, by signing the certification contract, so that it can provide BRC with the necessary information regarding inspection checks performed in accordance with BRC Global Standard for Food Safety standards.

Art. 5 Certification contract

The company under certification and the certification body enter into a certification contract, which sets forth the methods and constraints for providing the service. The contract must be signed by both parties.