**Global Standard START!, Issue 2**

S203: Food Safety Management System to BRCGS Global Standard START! Transition Tool

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Document Scope: This document provides a transition tool to help sites that want to become certificated to BRCGS Global Standard START! (Issue 2) certification from a generic food safety management system. This tool can also be used by auditors for guidance.

Change log:

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| --- | --- | --- |
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Version 1

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## 1 Introduction

Welcome to the Food Safety Management System to START! Transition tool. Sites will find this useful when preparing to transition from any generic food safety management system to START! Basic and Intermediate level requirements.

It is essential to highlight that sites must ensure they comply with all requirements outlined in the START! Standard to achieve certification and not only the requirements listed in this tool. This tool is not a checklist. Where we refer to START! in this document we are referring to Global Standard START! (Issue 2) Basic and Intermediate requirements.

This transition tool is the outcome of a gap analysis conducted by BRCGS. The gap analysis was conducted to determine the differences between two different standards.

This document provides guidance for sites wishing to transition from a generic food safety management system toBRCGS START! Basic and Intermediate level by helping sites to assess their operations against the requirements and prepare for a certification audit.

Auditors may also find this document useful when auditing a site which is in the process of transitioning from a generic food safety management system to START! Basic and Intermediate levels.

### How to use the Transition Tool

This tool is designed to help assess a site’s operations against the Basic and Intermediate level requirements of the START! programme and to help prepare for a START! certification audit.

While this tool will be useful in preparing for a START! audit, it does not contain all the clauses in the Standard. It will not be accepted by auditors as evidence of an internal audit. It is the site’s responsibility to ensure that they are prepared for their audit. This document should be seen as guidance only - providing a stepping stone to gain START! Basic and Intermediate level certification.

Completing this transition tool may help sites to be aware of any challenges which may affect their ability to progress to START!.

### 1.2 Further Information

BRCGS is the leading provider of global supply chain assurance standards recognised by thousands of customers worldwide. BRCGS:

* was the first scheme owner to be recognised as GFSI benchmarked
* gives results you can trust
* offers the most rigorous schemes
* provides the best auditors

BRCGS was founded in 1996 by retailers who wanted to harmonise food safety standards across the supply chain. Today we are globally recognised across both food and non-food categories and operate third-party certification schemes across areas such as food, packaging materials and distribution. Our message is clear, we have the most rigorous schemes and the highest trained auditors giving you the best results possible.

The START! programme recognises and encourages the development of food safety systems in small sites where food safety management systems are immature. It has been developed in line with the full Global Standard [Food Safety](https://www.brcgs.com/our-standards/food-safety/).

BRCGS START! gives you a clear path towards improved food safety standards as you grow.

For further information about the BRCGS START! programme, please visit the website.

[BRCGS (brcgs.com/our-standards/start)](https://lgconline-my.sharepoint.com/personal/rhiannon_abdi-price_lgcgroup_com/Documents/_User%20Profile/Downloads/www.brcgs.com/our-standards/start)

If sites have any further questions about this transition tool or BRCGS Global Standard START!, please do not hesitate to contact the team.

Email – brcgs.enquiries@lgcgroup.com

## 2 Requirements

The clauses listed in this document are the START! Basic and Intermediate level requirements that are not included or are only partially included in a generic food safety management system. A site will have to achieve compliance to all these requirements if transitioning to START certification. Sites must therefore focus on these requirements to progress to become START! certificated.

As an aid, the START! clauses are identified as ‘Basic only’, ‘Basic and Intermediate’ or as ‘Intermediate only’. The difference between the levels is outlined below.

|  |  |
| --- | --- |
| **START! Level** | **Description** |
| **Basic only** | START! Basic level requirements only. |
| **Basic and intermediate** | START! Basic level and START! Intermediate level requirements. |
| **Intermediate only** | START! Intermediate level requirements only, these clauses are generally more challenging to evidence or comply with. |

**Key**

Where a BRCGS START! requirement is partially or not met, it is listed in this transition tool. All requirements which have been fully met via a typical food safety management system are not listed in this tool.

The key below highlights whether food safety management systems partially meet or does not meet the BRCGS START! requirements.

|  |  |
| --- | --- |
| **Colour**  | **Description** |
|  | Does not meet BRCGS START! requirements  |
|  | Partially meets BRCGS START! requirements |

|  |  |
| --- | --- |
| **1** | **Senior management commitment** |
| **1.1** | **Senior management commitment and continual improvement** |
| **Statement of intent**  | The site’s senior management shall demonstrate they are fully committed to the implementation of the requirements of the START! programme and to processes which facilitate continual improvement of food safety and quality management and the site’s food safety and quality culture. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **1.1.3****Basic and intermediate** | The site’s senior management shall ensure that clear objectives are defined to maintain and improve the safety, authenticity, legality and quality of products manufactured, in accordance with the food safety and quality policy and the START! programme. |  |  |
| **1.1.8****Intermediate only** | The company’s senior management shall have a system in place to ensure that the site is kept informed of and reviews relevant food safety legislation applicable to the production site and as applicable in the country where the product is intended for sale. |  |  |
| **1.1.11****Basic and intermediate** | The most senior production or operations manager on site shall participate in the opening and closing meetings of the audit for certification to the START! programme. Relevant departmental managers or their deputies shall be available as required during the audit. |  |  |
| **1.1.12****Basic and intermediate** | The site’s senior management shall ensure that the root causes of any non-conformities against the START! programme identified at the previous audit have been effectively addressed to prevent recurrence.  |  |  |
| **1.2** | **Organisational structure, responsibilities and management authority** |
| **Statement of intent** | The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality and quality. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **1.2.1****Basic and intermediate** | The company shall have an organisation chart demonstrating the management structure of the company. The responsibilities for the management of activities which ensure food safety, authenticity, legality and quality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person. |  |  |
| **1.2.2****Intermediate only** | The site’s senior management shall ensure that all employees are aware of their responsibilities and work in accordance with site policies, procedures, work instructions and existing practices for activities undertaken. |  |  |
| **2** | **The food safety plan – HACCP** |
| **Statement of intent** | The company shall have a fully implemented and effective food safety plan incorporating the Codex Alimentarius HACCP principles. |
| **2.1** | **The HACCP food safety team (equivalent to Codex Alimentarius Step 1)** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **2.1.1****Basic only** | The HACCP plan shall be undertaken by a HACCP team or individual with an in-depth knowledge of HACCP principles and able to demonstrate competence and experience. Where there is a legal requirement for specific training, this shall be in place. |  |  |
| **Intermediate only** | The HACCP or food safety plan shall be developed and managed by a multi-disciplinary food safety team that includes those responsible for quality assurance, technical management, production operations engineering and other relevant functions (e.g. engineering, hygiene). The team leader shall have an in-depth knowledge of Codex HACCP principles (or equivalent) and be able to demonstrate competence, experience and training. Where there is a legal requirement for specific training, this shall be in place. The team members shall have specific knowledge of HACCP and relevant knowledge of products, processes and associated hazards. |  |  |
| **2.5** | **Construct a process flow diagram (equivalent to Codex Alimentarius Step 4)** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **2.5.1****Basic and intermediate** | A flow diagram shall be prepared to cover each product, product category or process. This shall set out all aspects of the food process operation within the HACCP or food safety plan scope, from raw material receipt through to processing, storage and distribution. |  |  |
| **Intermediate only** | As a guide, this should include the following, although this is not an exhaustive list:• plan of premises and equipment layout• raw materials, including introduction of utilities and other contact materials (e.g. water, packaging)• sequence and interaction of all process steps• outsourced processes and subcontracted work• potential for process delay• rework and recycling• low-risk/high-risk/high-care area segregation• finished products, intermediate/semi-processed products, by-products and waste. |  |  |

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| **3** | **Food safety and quality management system** |
| **3.1** | **Food safety and quality manual** |
| **Statement of intent** | The company’s processes and procedures to meet the requirements of the START! programme shall be documented to allow consistent application, facilitate training, and support due diligence in the production of a safe product. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.1.2****Intermediate only** | The food safety and quality manual shall be fully implemented and the manual or relevant components shall be readily available to relevant staff. |  |  |
| **3.2** | **Document control** |
| **Statement of intent** |  |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.2.1****Basic and intermediate** | The company shall have a procedure to manage documents which form part of the food safety and quality system. Where documents are stored in electronic form these shall also be:• stored securely (e.g. with authorised access, control of amendments, or password protection)• backed up to prevent loss. |  |  |
| **Intermediate only** | The procedure to manage documents which form part of the food safety and quality system shall also include:• a list of all controlled documents indicating the latest version number• the method for the identification and authorisation of controlled documents• a record of the reason for any changes or amendments to documents• the system for the replacement of existing documents when these are updated. |  |  |
| **3.3** | **Record completion and maintenance** |
| **Statement of intent** | The site shall maintain genuine records to demonstrate the effective control of product safety, legality and quality. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.3.1****Basic and intermediate** | Records shall be legible, maintained in good condition and retrievable. Any alterations to records shall be authorised and justification for the alteration shall be recorded. Where records are in electronic form these shall also be:• stored securely (e.g. with authorised access, control of amendments, or password protection)• suitably backed up to prevent loss. |  |  |
| **3.3.2****Basic and intermediate** | Records shall be retained for a defined period with consideration given to:• any legal or customer requirements• the shelf life of the product.This shall take into account, where it is specified on the label, the possibility that shelf life may be extended by the consumer (e.g. by freezing).At a minimum, records shall be retained for the shelf life of the product plus 12 months. |  |  |
| **3.4** | **Internal audits** |
| **Statement of intent** | The company shall be able to demonstrate it verifies the effective application of the food safety plan, and the implementation of the requirements of the START! programme and the site’s food safety and quality management system. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.4.4****Intermediate only** | There shall be a separate programme of documented inspections to ensure that the factory environment and processing equipment are maintained in a suitable condition for food production. At a minimum, these inspections shall include: • hygiene inspections to assess cleaning and housekeeping performance • fabrication inspections (e.g. doors, walls, facilities and equipment) to identify risks to the product from the building or equipment. The frequency of these inspections shall be based on risk but will be no less than once per month in open product areas |  |  |
| **3.5** | **Supplier and raw material approval and performance monitoring** |
| **3.5.1** | **Management of suppliers of raw materials and packaging** |
| **Statement of intent** | The company shall have an effective supplier approval and monitoring system to ensure that any potential risks from raw materials (including primary packaging) to the safety, authenticity, legality and quality of the final product are understood and managed. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.5.1.2****Basic only** | 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. |  |  |
| **Intermediate only** | The approval procedure shall be based on risk. |  |  |
| **3.5.1.3****Intermediate only** | There shall be a documented process for ongoing supplier performance review, based on risk and defined performance criteria. The process shall be fully implemented. |  |  |
| **3.5.1.4****Basic and intermediate** | The site shall have an up-to-date list or database of approved suppliers. This may be on paper (hard copy) or it may be controlled on an electronic system. The list or relevant components of the database shall be readily available to the relevant staff (e.g. at goods receipt). |  |  |
| **3.5.2** | **Raw material and packaging acceptance, monitoring and management procedures** |
| **Statement of intent** | Controls on the acceptance of raw materials (including primary packaging) shall ensure that these do not compromise the safety, legality or quality of products and where appropriate any claims of authenticity. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **2.5.2.1****Basic only** | The company shall have a procedure for the acceptance of raw materials and primary packaging on receipt. A list of raw materials (including primary packaging) and the requirements to be met for acceptance shall be available. |  |  |
| **Intermediate only** | The company shall have a procedure for the acceptance of raw materials and primary packaging on receipt based upon the risk assessment. A list of raw materials (including primary packaging) and the requirements to be met for acceptance shall be available. The parameters for acceptance and frequency of testing shall be clearly defined, implemented and reviewed. |  |  |
| **3.5.3** | **Management of suppliers of services** |
| **Statement of intent** | The company shall be able to demonstrate that where services are outsourced the service is appropriate and any risks presented to food safety, legality and quality have been evaluated to ensure effective controls are in place. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.5.3.1****Basic and Intermediate** | Examples of services to consider:* pest control
* laundry services
* contracted cleaning
* contracted servicing and maintenance of equipment
* transport and distribution
* off-site storage of ingredients or packaging (other than at the supplier’s facilities) prior to delivery to the site
* off-site packing of products
* laboratory testing
* catering services
* waste management
* providers of product safety training
* product safety consultants
 |  |  |
| **3.5.4** | **Management of outsourced processing** |
| **Statement of intent** | Where any intermediate process step (including production, processing or storage) in the manufacture of a product is outsourced to a third party or undertaken at another site, and subsequently returned to the site, this shall be managed to ensure it does not compromise the product safety, authenticity, legality or quality. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.5.4.1****Intermediate only** | The company shall be able to demonstrate that, where part of the production process (i.e. any intermediate process step) is outsourced or undertaken off-site, and subsequently returned to the site, this has been declared to the customer and, where required, approval granted. |  |  |
| **3.5.4.5****Basic and Intermediate** | Any outsourced processing operations shall:* be undertaken in accordance with established contracts which clearly define any processing requirements
* maintain product traceability.
 |  |  |
| **3.6** | **Specifications** |
| **Statement of intent** | Specifications shall exist for raw materials (including primary packaging), finished products and any product or service which could affect the integrity of the finished product. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.6.3****Intermediate only** | Where the company is manufacturing customer-branded products, it shall seek formal agreement of the finished product specifications. Where specifications are not formally agreed, the company shall be able to demonstrate that it has taken steps to ensure formal agreement is in place. |  |  |
| **3.7** | **Corrective and preventive actions** |
| **Statement of intent** | The site shall be able to demonstrate that it uses the information from identified failures in the food safety and quality management system to make necessary corrections and prevent recurrence. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.7.1****Intermediate only** | The site shall have a procedure for handling and correcting issues identified in the food safety and quality management system. The site procedures shall include the completion of root cause analysis and implementation of preventive action. |  |  |
| **3.8** | **Control of non-conforming product** |
| **Statement of intent** | The site shall ensure that any out-of-specification product is effectively managed to prevent unauthorised release. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.8.1****Basic only** | There shall be procedures for managing non-conforming products. These procedures shall include:• the requirement for staff to identify and report a potentially non-conforming product• clear identification of a non-conforming product (e.g. direct labelling or the use of IT systems)• records of the decision on the use or disposal of the product. |  |  |
| **Intermediate only** | There shall be procedures for managing non-conforming products. These procedures shall include:• the requirement for staff to identify and report a potentially non-conforming product• clear identification of a non-conforming product (e.g. direct labelling or the use of IT systems)• secure storage to prevent accidental release (e.g. physical or computer-based isolation)• management of any product returned to the site• referral to the brand owner where required• defined responsibilities for decision-making on the use or disposal of productsappropriate to the issue (e.g. destruction, reworking, downgrading to an alternative label or acceptance by concession)• records of the decision on the use or disposal of the product• records of destruction where a product is destroyed for food safety reasons. |  |  |
| **3.9** | **Traceability** |
| **Statement of intent** | The site shall be able to trace all raw material product lots (including primary packaging) from its suppliers through all stages of processing and dispatch to its customers and vice versa. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.9.1****Basic and Intermediate** | The site shall have a documented traceability procedure designed to maintain traceability throughout the site’s processes. At a minimum this shall include:• how the traceability system works• the labelling and records required.Where applicable, the traceability system shall meet the legal requirements in the country of sale or intended use |  |  |
| **3.9.3****Intermediate only** | The site shall test the traceability system across the range of product groups to ensure traceability can be determined from the raw material (including primary packaging) to the finished product and vice versa. For food raw materials and finished products (i.e. including printed packaging and labels with food safety and legal information), the test of the traceability system shall include a quantity check/mass balance. |  |  |
| **3.10** | **Complaint-handling** |
| **Statement of intent** | Customer complaints shall be handled effectively and information used to reduce recurring complaint levels. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.10.1****Basic and Intermediate** | All complaints shall be recorded, investigated and the results of the investigation of the issue recorded where sufficient information is provided. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff. |  |  |
| **3.10.2****Intermediate only** | Complaint data shall be analysed for significant trends. Where there has been a significant increase in a complaint or a serious complaint, root cause analysis shall be used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff. |  |  |
| **3.11** |  |
| **Statement of intent** | The company shall have a plan and system in place to manage incidents effectively and enable the withdrawal and recall of products should this be required. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **3.11.2****Basic and Intermediate** | The company shall have a documented product withdrawal and recall procedure. This shall include, at a minimum: • identification of key personnel constituting the recall management team, with clearly identified responsibilities • guidelines for deciding whether a product needs to be recalled or withdrawn and the records to be maintained • an up-to-date list of key contacts (including out-of-hours contact details) or reference to the location of such a list (e.g. recall management team, emergency services, suppliers, customers, certification body, regulatory authority) • a communication plan including the provision of information to customers, consumers and regulatory authorities in a timely manner • details of external agencies providing advice and support as necessary (e.g. specialist laboratories, regulatory authority and legal expertise) • a plan to handle the logistics of product traceability, recovery or disposal of affected product, and stock reconciliation. • a plan to record timings of key activities • a plan to conduct root cause analysis and to implement ongoing improvements, to avoid recurrence. The procedure shall be capable of being operated at any time. |  |  |
| **3.11.3****Intermediate only** | 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. |  |  |
| **3.11.4****Basic and Intermediate** | In the event of a product recall, regulatory food safety non-conformity (e.g. a regulatory enforcement notice) the certification body issuing the current certificate for the site against the START! programme shall be notified within 3 working days. The company shall then provide sufficient information to enable the certification body to assess any effects of the incident on the ongoing validity of the current certificate within 21 calendar days. As a minimum, this shall include corrective action, root cause analysis and a preventive action plan. |  |  |
| **4** | **Site standards** |
| **4.1** | **External standards and site security** |
| **Statement of intent** | The production site shall be of suitable size, location and construction, and be maintained to reduce the risk of contamination and facilitate the production of safe and legal finished products. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.1.1****Basic and Intermediate** | Consideration shall be given to local activities and the site environment, which may have an adverse impact on finished product integrity, and measures shall be taken to prevent contamination. Where measures have been put into place to protect the site (from potential contaminants, flooding etc.), they shall be reviewed in response to any changes. |  |  |
| **4.1.2****Intermediate only** | The external areas shall be maintained in good order. Where grassed or planted areas are located near buildings, they shall be regularly tended and well maintained. External traffic routes under site control shall be suitably surfaced and maintained in good repair to mitigate the risk of contamination of the product. |  |  |
| **4.1.3****Basic and Intermediate** | The building fabric shall be maintained to minimise potential for product contamination (e.g. elimination of bird-roosting sites, sealing gaps around pipes to prevent pest entry, ingress of water and other contaminants). |  |  |
| **4.1.4****Basic and Intermediate** | Policies and systems shall be in place to ensure that access to the site by staff, contractors and visitors is controlled. |  |  |
| **Intermediate only** | A visitor recording system shall be in place.Contractors and visitors, including drivers, shall be made aware of the procedures for access to the site.Only authorised personnel shall have access to production and storage areas. Contractors working in product processing or storage areas shall be the responsibility of a nominated person.Staff shall be trained in site security procedures. |  |  |
| **4.2** | **Food defence** |
| **Statement of intent** | Systems shall protect products, premises and brands from malicious actions while under the control of the site. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.2.2****Basic and Intermediate** | Where applicable, the food defence plan shall meet the legal requirements in the country of sale or intended use. |  |  |
| **Intermediate only** | 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 food defence plan. This plan shall be kept under review to reflect changing circumstances and market intelligence. |  |  |
| **4.2.4****Intermediate only** | Areas where a significant risk is identified shall be defined in the food defence plan, monitored and controlled. These shall include external storage and intake points for products and raw materials (including packaging).Staff shall be trained in food defence procedures. |  |  |
| **4.3** | **Layout, product flow and segregation** |
| **Statement of intent** | The factory layout, flow of processes and movement of personnel shall be sufficient to prevent the risk of product contamination and to comply with relevant legislation. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.3.2****Basic and Intermediate** | There shall be a map of the site. At a minimum, this map shall define:• production risk zones, where product is at different levels of risk from pathogen contamination – for example, high-risk, high-care, ambient high-care, low-risk and enclosed product areas (see clause 4.3.1 and Appendix 2)• access points for personnel• access points for raw materials (including packaging), semi-finished products and open products• routes of movement for personnel• routes of movement for raw materials (including packaging)• routes for the removal of waste• routes for the movement of rework• location of any staff facilities, including changing rooms, toilets, canteens and smoking areas• production process flows• any areas where time segregation is used to complete different activities (for example, time segregation for high-care areas). |  |  |
| **4.3.4****Intermediate only** | The movement of personnel, raw materials, packaging, rework and/or waste shall not compromise the safety of products. The process flow, together with the use of demonstrably effective procedures, shall be in place to minimise the risk of the contamination of raw materials, intermediate/semi-processed products, packaging and finished products. |  |  |
| **4.3.5****Intermediate only** | Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly under safe hygienic conditions. |  |  |
| **4.4** | **Building fabric, raw material handling, preparation, processing, packing and storage areas** |
| **Statement of intent** | The fabrication of the site, buildings and facilities shall be suitable for the intended purpose. |
| **Clause/Level** | Requirements | **Conforms** | **Comments** |
| **4.4.1****Basic and Intermediate** | Walls shall be finished and maintained to prevent the accumulation of dirt, minimise condensation and mould growth, and facilitate cleaning. |  |  |
| **4.4.2****Basic and Intermediate** | Floors shall be suitably hard-wearing to meet the demands of the process, and withstand cleaning materials and methods. They shall be impervious, be maintained in good repair and facilitate cleaning. |  |  |
| **4.4.3****Basic and Intermediate** | Drainage, where provided, shall be sited, designed and maintained to minimise risk of product contamination and not compromise product safety.  |  |  |
| **Intermediate only** | Machinery and piping shall be arranged so that, wherever feasible, process waste water goes directly to drain. Where significant amounts of water are used, or direct piping to drain is not feasible, floors shall have adequate falls to cope with the flow of any water or effluent towards suitable drainage. |  |  |
| **4.4.4****Basic and Intermediate** | Ceilings and overheads shall be constructed, finished and maintained to prevent the risk of product contamination. |  |  |
| **4.4.7****Basic and Intermediate** | Where there is a risk to product, windows and roof glazing which are designed to be opened for ventilation purposes shall be adequately screened to prevent the ingress of pests. |  |  |
| **4.4.8** **Basic and** **Intermediate**  | Doors (both internal and external) shall bemaintained in good condition.  |  |  |
| **Intermediate only** | At a minimum:• external doors and dock levellers shall be close fitting or adequately proofed• external doors to open product areas shall not be opened during production periods except in emergencies• where external doors to enclosed product areas are opened, suitable precautions shall be taken to prevent pest ingress. |  |  |
| **4.4.9****Basic and Intermediate** | Suitable and sufficient lighting shall be provided for correct operation of processes, inspection of product and effective cleaning. |  |  |
| **4.4.10****Basic and Intermediate** | Adequate ventilation and extraction shall be provided in product storage and processing environments to prevent condensation or excessive dust. |  |  |
| **4.4.11****Basic and Intermediate** | Where plastic strip curtains are present, these shall be maintained in good condition, clean, fitted correctly (e.g. to prevent pest ingress or for temperature control), and shall not pose a food safety risk. |  |  |
| **4.5** | **Utilities – water, ice, air and other gases** |
| **Statement of intent** | Utilities used within the production and storage areas shall be monitored to effectively control the risk of product contamination. |
| Clause/Level | **Requirements** | **Conforms** | **Comments** |
| 4.5.1Basic and Intermediate | All water (including ice and steam) used as a raw material in the manufacture of processed food, the preparation of product, hand-washing or equipment or plant cleaning shall be supplied in sufficient quantity, be potable at point of use, be fit for purpose and pose no risk of contamination according to applicable legislation. Where water is stored and handled on site (e.g. in storage or holding tanks), these shall be managed to minimise food safety risks. |  |  |
| Intermediate only | The microbiological and chemical quality of water shall be analysed as required by legislation or at least annually. The sampling points, scope of the test and frequency of analysis shall be based on risk, taking into account the source of the water, on-site storage and distribution facilities, previous sample history and usage. |  |  |
| **4.5.3****Intermediate only** | Air and other gases used as an ingredient or that are in direct contact with products shall be monitored to ensure this does not represent a contamination risk. Compressed air that is in direct contact with the product shall be filtered at point of use. |  |  |
| **4.6** | **Equipment** |
| **Statement of intent** | All production and product-handling equipment shall be suitable for the intended purpose and shall be used to minimise the risk of contamination of product. |
| Clause/Level | **Requirements** | **Conforms** | **Comments** |
| 4.6.2Basic and Intermediate | Equipment that is in direct contact with food shall be suitable for food contact and meet legal requirements where applicable |  |  |
| **4.6.5****Intermediate only** | Food contact equipment that has been stored but is not in daily use shall be cleaned and, where necessary, disinfected prior to use. |  |  |
| **4.7** | **Maintenance** |
| **Statement of intent** | An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.7.1****Basic and Intermediate** | There shall be a documented planned maintenance schedule or condition monitoring system which includes all plant and processing equipment. The maintenance requirements shall be defined when commissioning new equipment. |  |  |
| **4.7.2****Intermediate only** | In addition to any planned maintenance programme, where there is a risk of product contamination by foreign bodies arising from equipment damage, the equipment shall be inspected at predetermined intervals, the inspection results documented and appropriate action taken. |  |  |
| **4.7.3****Basic and Intermediate** | Where temporary repairs are made, these shall be documented and controlled to ensure that the safety or legality of products is not jeopardised.  |  |  |
| **Intermediate only** | These temporary measures shall be permanently repaired as soon as practicable and within a defined timescale. |  |  |
| **4.7.4****Basic and Intermediate** | The site shall ensure that the safety or legality of products is not jeopardised during maintenance and subsequent cleaning operations. Maintenance work shall be followed by a documented hygiene clearance procedure.Equipment and machinery shall be inspected by an authorised member of staff to confirm the removal of contamination hazards, before being accepted back into operation. |  |  |
| **4.7.5****Intermediate only** | Materials and parts used for equipment and plant maintenance shall be of an appropriate grade or quality. |  |  |
| **4.8** | **Staff facilities** |
| **Statement of intent** | Staff facilities shall be sufficient to accommodate the required number of personnel, and shall be designed and operated to minimise the risk of product contamination. The facilities shall be maintained in good and clean condition. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.8.1****Basic and Intermediate** | Designated changing facilities shall be provided for all personnel, whether staff, visitor or contractor. These shall be sited to allow direct access to the production, packing or storage areas without recourse to any external area. Where this is not possible, a risk assessment shall be carried out and procedures implemented accordingly (e.g. the provision of cleaning facilities for footwear). |  |  |
| **4.8.3****Basic and Intermediate** | Outdoor clothing and other personal items shall be stored separately from production clothing within the changing facilities. Facilities shall be available to separate clean and dirty production clothing. |  |  |
| **4.8.4****Basic and Intermediate** | Suitable and sufficient hand-washing facilities shall be provided at access to, and at other appropriate points within, production areas. Such hand-washing facilities shall provide, at a minimum:• advisory signs to prompt hand-washing• a sufficient quantity of water at a suitable temperature• water taps with hands-free operation• liquid/foam soap• single-use towels or suitably designed and located air driers. |  |  |
| **4.8.5****Basic and Intermediate** | Toilets shall be adequately segregated and shall not open directly into production or packing areas. Toilets shall be provided with hand-washing facilities comprising:• basins with soap and water at a suitable temperature• adequate hand-drying facilities• advisory signs to prompt hand-washing.Where hand-washing facilities within toilets are the only hand-washing facilities provided before re-entering production, the requirements of clause 4.8.4 shall apply and signs shall be in place to direct people to hand-washing facilities before entering production. |  |  |
| **4.8.6****Basic and Intermediate** | Where smoking is allowed under national law, designated controlled smoking areas shall be provided which are both isolated from production areas to an extent that ensures smoke cannot reach the product and fitted with sufficient extraction to the exterior of the building. Adequate arrangements for dealing with smokers’ waste shall be provided at smoking facilities, both inside and at exterior locations. Electronic cigarettes shall not be permitted to be used or brought into production or storage areas. |  |  |
| **4.8.7****Basic and Intermediate** | All food brought into manufacturing premises by staff shall be appropriately stored in a clean and hygienic state. No food shall be taken into storage, processing or production areas. Where eating of food is allowed outside during breaks, this shall be in suitable designated areas with appropriate control of waste. |  |  |
| **4.9** | **Chemical and physical product contamination control: raw material handling, preparation, processing, packing and storage areas** |
| **Statement of intent** | Appropriate facilities and procedures shall be in place to control the risk of chemical or physical contamination of product. |
| **4.9.1** |  |
| **Clause/Level** |  **Requirements** | **Conforms** | **Comments** |
| **4.9.1.1****Intermediate only** | Processes shall be in place to manage the use, storage and handling of non-food chemicals to prevent chemical contamination. These shall include, at a minimum:• an approved list of chemicals for purchase• availability of material safety data sheets and specifications• confirmation of suitability for use in a food-processing environment• avoidance of strongly scented products• the labelling and/or identification of containers of chemicals at all times• a designated storage area (separate from chemicals used as raw materials in products) with access restricted to authorised personnel• use by trained personnel only• procedures to manage any spills• procedures for the safe, legal disposal or return of obsolete or out-of-date chemicals and empty chemical containers. |  |  |
| **4.9.2** | **Metal control** |
| **Clause/Level** |  **Requirements** | **Conforms** | **Comments** |
| **4.9.2.2****Basic and Intermediate** | The purchase of ingredients and packaging which use staples or other foreign-body hazards as part of the packaging materials shall be avoided.Staples, paper clips and drawing pins shall not be used in open product areas.Where staples or other items are present as packaging materials or closures, appropriate precautions shall be taken to minimise the risk of product contamination. |  |  |
| **4.9.3** | **Glass, brittle plastic, ceramics and similar materials** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.9.3.1****Basic and Intermediate** | Glass or other brittle materials shall be excluded or protected against breakage in areas where open products are handled or there is a risk of product contamination. |  |  |
| **4.9.3.3****Intermediate only** | Procedures detailing the action to be taken in the event of breakage of glass or other brittle items shall be implemented and include the following:• training of staff in the correct procedure• quarantining the products and production area that were potentially affected• cleaning the production area• inspecting the production area and authorising production to continue• changing of workwear and inspection of footwear• specifying those staff authorised to carry out the above points• recording the breakage incident• safely disposing of contaminated product. |  |  |
| **4.9.3.4****Basic and Intermediate** | Where they pose a risk to product, glass windows shall be protected against breakage. |  |  |
| **4.9.3.5****Intermediate only** | Where they pose a risk to product, bulbs and strip lights (including those on electric flykiller devices) shall be adequately protected. Where full protection cannot be provided, alternative management such as wire-mesh screens or monitoring procedures shall be in place. |  |  |
| **4.9.4** | **Products packed into glass or other brittle containers** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.9.4.2****Basic and Intermediate** | Systems shall be in place to manage container breakages between the container-cleaning/ inspection point and container closure. This shall include, as a minimum, documented instructions which ensure:• the removal and disposal of at-risk products in the vicinity of the breakage; this may be specific for different equipment or areas of the production line• the effective cleaning of the line or equipment which may be contaminated by fragments of the container; cleaning shall not result in the further dispersal of fragments, for instance by the use of high-pressure water or air• the use of dedicated, clearly identifiable cleaning equipment (e.g. colour-coded) for removal of container breakages; such equipment shall be stored separately from other cleaning equipment• the use of dedicated, accessible, lidded waste containers for the collection of damaged containers and fragments• a documented inspection of production equipment is undertaken following the cleaning of a breakage, to ensure cleaning has effectively removed any risk of further contamination• authorisation given for production to restart following cleaning• the area around the line being kept clear of broken glass. |  |  |
| **4.9.5** | **Wood** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.9.5.1****Basic and Intermediate** | Wood used for food contact purposes shall be fit for purpose (e.g. free from damage or splinters, free from taint; and wood treatments, where used, are used only in accordance with legislation and approved for food use). |  |  |
| **Intermediate only** | Wood should not be used in open product areas except where this is a process requirement (e.g. maturation of products in wood). Where the use of wood cannot be avoided, its condition shall be monitored on a risk-based frequency to ensure it is in good condition and free from damage or splinters which could contaminate products. |  |  |
| **4.9.6** | **Other physical contaminants** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.9.6.3****Basic and Intermediate** | Procedures shall be implemented to minimise other types of foreign-body that are reasonably expected to occur at a site but are not specifically covered in section 4.9. |  |  |
| **4.10** | **Foreign-body detection and removal equipment** |
| **Statement of intent** | The risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies. |
| **4.10.1** | **Selection and operation of foreign-body detection and removal equipment** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.10.1.1****Basic and Intermediate** | A documented assessment in association with the food safety plan (see section 2) shall be carried out on each production process to identify the potential use of equipment to detect or remove foreign-body contamination.  |  |  |
| **Intermediate only** | A documented assessment in association with the food safety plan (see section 2) shall be carried out on each production process to identify the potential use of equipment to detect or remove foreign-body contamination. Typical equipment to be considered may include: • filters and sieves • metal detection and x-ray detection equipment • magnets • optical sorting equipment • other physical separation equipment |  |  |
| **4.10.1.2****Intermediate only** | The type, location and sensitivity of the detection and/or removal method shall be specified as part of the site’s documented system. Industry best practice shall be applied with regard to the nature of the ingredient, material, product and/or the packed product. The location of the equipment or any other factors influencing the sensitivity of the equipment shall be validated and justified. |  |  |
| **4.10.1.3****Intermediate only** | The site shall ensure that the frequency of the testing of the foreign-body detection and/ or removal equipment is defined and takes into consideration: • specific customer requirements • the site’s ability to identify, hold and prevent the release of any affected materials, should the equipment fail. The site shall establish and implement corrective action and reporting procedures in the event of a failure of the foreign-body detector and/or removal equipment. Action shall include a combination of isolation, quarantining and re-inspection of all products produced since the last successful test or inspection |  |  |
| **4.10.1.4****Basic and Intermediate** | Where foreign material is detected or removed by the equipment, the source of any unexpected material shall be investigated. Information on rejected materials shall be used to identify trends and, where possible, instigate preventive action to reduce the occurrence of contamination by the foreign material. |  |  |
| **4.10.2** | **Filters and sieves** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.10.2.1****Basic and Intermediate** | Filters and sieves used for foreign-body control shall be of a specified mesh size or gauge and designed to provide the maximum practical protection for the product. |  |  |
| **4.10.2.2****Basic and Intermediate** | Filters and sieves shall be regularly inspected or tested for damage at a documented frequency based on risk. Records shall be maintained of the checks. Where defective filters or sieves are identified, this shall be recorded and the potential for contamination of products investigated, and appropriate action taken. |  |  |
| **4.10.3** | **Metal detectors and X-ray equipment** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.10.3.2****Basic and Intermediate** | The metal detector or X-ray equipment shall incorporate one of the following:* an automatic rejection device, for continuous in-line systems, which shall divert contaminated product either out of the product flow or to a secure unit accessible only to authorised personnel
* a belt stop system with an alarm where the product cannot be automatically rejected (e.g. for very large packs)
* in-line detectors which identify the location of the contaminant to allow effective segregation of the affected product.
 |  |  |
| **4.10.6** | **Container cleanliness – glass jars, cans and other rigid containers** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.10.6.1****Basic and Intermediate** | Based on risk assessment, procedures shall be implemented to minimise foreign-body contamination originating from the packaging container (e.g. jars, cans and other pre-formed rigid containers). This may include the use of covered conveyors, container inversion and foreign-body removal through rinsing with water or air jets. |  |  |
| **4.10.7** | **Other foreign-body detection and removal equipment** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.10.7.1****Basic and Intermediate** | Other foreign-body detection and removal equipment, such as gravity separation, fluid bed technology or aspirators, shall be checked in accordance with the manufacturer’s instructions or recommendations.Checks shall be documented. |  |  |
| **4.11** | **Housekeeping and hygiene** |
| **Statement of intent** | Housekeeping and cleaning systems shall be in place which ensure appropriate standards of hygiene are maintained at all times and the risk of product contamination is minimised. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.11.1****Basic and Intermediate** | The premises and equipment shall be maintained in a clean and hygienic condition. |  |  |
| **4.11.2****Basic and Intermediate** | Documented cleaning and disinfection procedures shall be in place and maintained for the building, plant and all equipment. The procedures shall be implemented to ensure appropriate standards of cleaning are achieved. |  |  |
| **Intermediate only** | Cleaning procedures for the processing equipment and food contact surfaces shall, at a minimum, include:• responsibility for cleaning• item/area to be cleaned• frequency of cleaning• method of cleaning, including dismantling equipment for cleaning purposes where required• cleaning chemicals and concentrations• cleaning materials to be used• cleaning records (including records for completion and sign-off) and responsibility for verification.The frequency and methods of cleaning shall be based on risk. |  |  |
| **4.11.4****Basic and Intermediate** | The resources for undertaking cleaning shall be available. Where it is necessary to dismantle equipment for cleaning purposes or to enter large equipment for cleaning, this shall be appropriately scheduled and, where necessary, planned for non-production periods. Cleaning staff shall be adequately trained or engineering support provided where access within equipment is required for cleaning. |  |  |
| **4.11.6****Basic and Intermediate** | Cleaning equipment shall be:• hygienically designed and fit for purpose• suitably identified for intended use (e.g. colour-coded or labelled)• cleaned and stored in a hygienic manner to prevent contamination. |  |  |
| **4.11.7** | **Cleaning in place (CIP)** |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.11.7.3****Intermediate only** | The CIP equipment shall be maintained by suitably trained staff to ensure effective cleaning is carried out. |  |  |
| **4.11.7.4****Intermediate only** | CIP facilities, where used, shall be monitored at a defined frequency based on risk. |  |  |
| **4.12** |  |
| **Statement of intent** |  |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.12.1****Basic and Intermediate** | Where licensing is required by law for the removal of waste, it shall be removed by licensed contractors.  |  |  |
| **Intermediate only** | Records of removal shall be maintained and available for audit. |  |  |
| **4.12.2****Basic and Intermediate** | Internal and external waste collection containers and rooms housing waste facilities shall be managed to minimise risk. These shall be:• clearly identified• designed for ease of use and effective cleaning• well maintained to allow cleaning and, where required, disinfection• emptied at appropriate frequencies.External waste containers shall be covered or doors kept closed as appropriate |  |  |
| **4.14** | **Pest management** |
| **Statement of intent** | The whole site shall have an effective preventive pest management programme in place to minimise the risk of pest presence and resources shall be available to respond rapidly to any issues which occur to prevent risk to products.Pest management programmes shall comply with all applicable legislation. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.14.1****Basic and Intermediate** | If pest activity is identified, it shall not present a risk of contamination to products, raw materials or packaging.The presence of any infestation on site shall be documented in pest management records and be part of an effective pest management programme to eliminate or manage the infestation so that it does not present a risk to products, raw materials or packaging. |  |  |
| **4.14.2****Basic and Intermediate** | The site shall either contract the services of a competent pest management organisation or have appropriately trained staff for the regular inspection and treatment of the site to deter and eradicate infestation. The frequency of inspections shall be determined by risk assessment and shall be documented. Where the services of a pest management contractor are employed, the service scope shall be clearly defined and reflect the activities of the site |  |  |
| **4.14.3****Basic and Intermediate** | Where a site undertakes its own pest management, it shall be able to effectively demonstrate that:* pest management operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the biology of the pests associated with the site
* staff undertaking pest management activities meet any legal requirements for training or registration
* sufficient resources are available to respond to any infestation issues
* there is ready access to specialist technical knowledge when required
* legislation governing the use of pest control products is understood and complied with
* dedicated locked facilities are used for the storage of pesticides.
 |  |  |
| **4.14.4****Basic and Intermediate** | Pest management documentation and records shall be maintained. At a minimum, this shall include:• an up-to-date plan of the full site, identifying pest control devices and their locations• identification of the baits and/or monitoring devices on site• clearly defined responsibilities for the site management and the contractor• details of pest control products used, including instructions for their effective use and action to be taken in the event of an emergency• any observed pest activity• details of pest control treatments undertaken.Records may be on paper (hard copy) or controlled on an electronic system (e.g. an online reporting system). |  |  |
| **4.14.5****Basic and Intermediate** | Bait stations or other rodent monitoring or control devices shall be appropriately located and maintained to prevent contamination risk to product. Toxic rodent baits shall not be used within production or storage areas where open product is present except when treating an active infestation. Where toxic baits are used, these shall be secured. Any missing bait stations shall be recorded, reviewed and investigated. |  |  |
| **4.14.6****Basic and Intermediate** | Insect-killing devices, pheromone traps and/or other insect monitoring devices shall be appropriately sited and operational. If there is a danger of insects being expelled from a fly-killing extermination device and contaminating the product, alternative systems and equipment shall be used. |  |  |
| **4.14.8****Basic and Intermediate** | In the event of infestation, or evidence of pest activity, immediate action shall be taken to identify at-risk products and to minimise the risk of product contamination. Any potentially affected products should be subject to the non-conforming product procedure. |  |  |
| **4.14.9****Basic and Intermediate** | Records of pest management inspections, pest proofing and hygiene recommendations and actions taken shall be maintained. It shall be the responsibility of the site to ensure that all of the relevant recommendations made by its contractor or in-house expert are carried out in a timely manner. |  |  |
| **4.14.12****Basic and Intermediate** | Staff shall understand the signs of pest activity and be aware of the need to report any evidence of pest activity to a designated manager. |  |  |
| **4.15** | **Storage facilities** |
| **Statement of intent** | All facilities used for the storage of raw materials, packaging, in-process products and finished products shall be suitable for purpose. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.15.3****Basic and Intermediate** | Where temperature control is required (e.g. for raw materials, semi-finished materials or final products), the storage area shall be capable of maintaining product temperature within specification and operated to ensure specified temperatures are maintained. Temperature recording equipment with suitable temperature alarms shall be fitted to all storage facilities or there shall be a system of recorded manual temperature checks, typically on at least a 4-hourly basis or at a frequency which allows for intervention before product temperatures exceed defined limits for the safety, legality or quality of products. |  |  |
| **4.15.4****Basic and Intermediate** | Where controlled atmosphere storage is required, the storage conditions shall be specified and effectively controlled. Records shall be maintained of the storage conditions. |  |  |
| **4.15.5****Basic and Intermediate** | Where storage outside is necessary, items shall be protected from contamination and deterioration. Items shall be checked for suitability before being brought into the factory. |  |  |
| **4.15.6****Basic and Intermediate** | The site shall facilitate correct stock rotation of raw materials, intermediate products and finished products in storage and ensure that materials are used in the correct order in relation to their manufacturing date and within the prescribed shelf life. |  |  |
| **4.16** | **Dispatch and transport** |
| **Statement of intent** | Procedures shall be in place to ensure that the management of dispatch and of the vehicles and containers used for transporting products from the site do not present a risk to the safety, security or quality of the products. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **4.16.1****Basic and Intermediate** | Procedures to maintain product safety and quality during loading and transportation shall be developed and implemented. These may include, as appropriate:• controlling temperature of loading dock areas and vehicles• the use of covered bays for vehicle loading or unloading• securing loads on pallets to prevent movement during transit• inspection of loads prior to dispatch. |  |  |
| **4.16.2****Basic and Intermediate** | All vehicles or containers used for the transport of raw materials and the dispatch ofproducts shall be fit for purpose. This shall ensure that they are:• in a clean condition• free from strong odours which may cause taint to products• in a suitable condition to prevent damage to products during transit• equipped to ensure any temperature requirements can be maintained throughouttransportation.Records of inspections shall be maintained. |  |  |
| **4.16.3****Basic and Intermediate** | Where temperature control is required, the transport shall be capable of maintainingproduct temperature within specification, under minimum and maximum load. |  |  |
| **Intermediate only** | Temperature data-logging devices which can be interrogated to confirm time/temperature conditions or a system to monitor and record at predetermined frequencies the correct operation of refrigeration equipment shall be used and records maintained. |  |  |
| **4.16.4****Basic and Intermediate** | Maintenance systems and documented cleaning procedures shall be available for all vehicles and equipment used for loading/unloading. There shall be records of the measures taken. |  |  |

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| **5** | **Product control** |
| **5.1** | **Product design/development** |
| **Statement of intent** | Product design and development procedures shall be in place for new products or processes and any changes to product, packaging or manufacturing processes to ensure that safe and legal products are produced. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **5.1.2****Intermediate only** | All new products and changes to product formulation, packaging or methods of processing shall be formally approved by the person responsible for HACCP or, where a team is used, by an authorised HACCP committee member. This shall ensure that hazards have been assessed and suitable controls, identified through the HACCP system, are implemented. This approval shall be granted before products are introduced into the factory environment. |  |  |
| **5.2** | **Product labelling** |
| **Statement of intent** | Product labelling shall comply with the appropriate legal requirements and contain information to enable the safe handling, display, storage and preparation of the product within the food supply chain or by the customer. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **5.2.1****Basic and Intermediate** | All products shall be labelled to meet legal requirements for the designated country of use.  |  |  |
| **Intermediate only** | All products shall include information to allow the safe handling, display, storage, preparation and use of the product within the food supply chain or by the customer.There shall be a process to verify that ingredient and allergen labelling is correct based on the product recipe and ingredient specifications.The company shall have a procedure for artwork approval and sign-off. |  |  |
| **5.3** | **Management of allergens** |
| **Statement of intent** | The site shall have a system for the management of allergenic materials which minimises the risk of allergen contamination of products and meets legal requirements for labelling in the country of sale. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **5.3.1****Basic and Intermediate** | The site shall carry out an assessment of raw materials to establish the presence and likelihood of contamination (cross-contact) by allergens. This shall include a review of the raw material specifications and, where required, the acquisition of additional information from suppliers (e.g. through questionnaires to understand the allergen profile of the raw material, its ingredients and the factory in which it is produced). |  |  |
| **5.3.2****Basic and Intermediate** | The company shall identify and list allergen-containing materials handled on site. This shall include raw materials, processing aids, intermediate and finished products, and any new product development ingredients or products. |  |  |
| **5.3.4****Basic and Intermediate** | Procedures shall be established to ensure the effective management of allergenic materials to prevent cross-contamination (cross-contact) of products not containing the allergen. |  |  |
| **Intermediate only** | These shall include, as appropriate:• physical or time segregation while allergen-containing materials are being stored,processed or packed• the use of separate or additional protective overclothing when handling allergenic materials• use of identified, dedicated equipment and utensils for processing• scheduling of production to reduce changes between products containing an allergen and products not containing the allergen• systems to restrict the movement of airborne dust containing allergenic material• waste handling and spillage controls• restrictions on food brought onto site by staff, visitors and contractors and for catering purposes. |  |  |
| **5.3.5****Basic and Intermediate** | Where rework is used, or reworking operations are carried out, procedures shall be implemented to ensure rework containing allergens is not used in products that do not already contain the allergen. |  |  |
| **5.3.6****Basic and Intermediate** | Where the nature of the production process is such that cross-contamination (crosscontact) from an allergen cannot be prevented, a warning should be included on the label. Legislation, national guidelines or codes of practice shall be used when making such a warning statement. |  |  |
| **5.3.8****Basic and Intermediate** | Equipment or area-cleaning procedures shall be designed to remove or reduce to acceptable levels any potential cross-contamination (cross-contact) by allergens.  |  |  |
| **Intermediate only** | The cleaning methods shall be validated to ensure that they are effective and the effectiveness of the procedure routinely verified. Cleaning equipment used to clean allergenic materials shall either be identifiable and specific for allergen use, single use, or effectively cleaned after use. |  |  |
| **5.4** | **Product authenticity, claims and chain of custody** |
| **Statement of intent** | Systems shall be in place to minimise the risk of purchasing fraudulent or adulterated food raw materials and to ensure that all product descriptions and claims are legal, accurate and verified. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **5.4.5****Intermediate only** | Where products are labelled or claims are made on finished packs which are dependent on the status of a raw material, the status of each batch of the raw material shall be verified.The facility shall maintain purchasing records, traceability of raw material usage and final product packing records to substantiate claims. |  |  |
| **5.4.6****Intermediate only** | Where claims are made about the methods of production (e.g. organic, halal, kosher), the site shall maintain the necessary certification status in order to make such a claim. |  |  |
| **5.4.7****Basic and Intermediate** | Where a product is designed to enable a claim to be made, the company shall ensure that all claims are substantiated, and product formulation and the production process are fully validated to meet the stated claim and any legal requirements (in the country of intended sale) relating to the claim. The process flow for the production of products where claims are made shall be documented and potential areas for contamination or loss of identity identified. Appropriate controls shall be established to ensure the integrity of the product claims |  |  |
| **5.5** | **Product packaging** |
| **Statement of intent** | Product packaging shall be appropriate for the intended use and shall be stored under conditions to prevent contamination and minimise deterioration. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **5.5.1****Basic and Intermediate** | Evidence shall be available for primary packaging to confirm it complies with applicable food safety legislation and is suitable for its intended use. |  |  |
| **5.5.2****Basic and Intermediate** | Product liners and bags purchased by the company for use in direct contact with ingredients, or work in process, shall be appropriately coloured (e.g. contrasting colour to the product) and resistant to tearing to prevent accidental contamination. |  |  |
| **5.6** | **Product inspection, on-site product testing and laboratory testing** |
| **Statement of intent** | The company shall undertake or subcontract inspection and analyses which are critical to confirm product safety, authenticity, legality, and quality, using appropriate procedures, facilities and standards. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **5.6.1****Basic and Intermediate** | There shall be a scheduled programme of product testing which may include microbiological, chemical, physical and organoleptic testing according to risk. The methods, processes for obtaining product samples (including, where appropriate, their delivery to a laboratory) frequency and specified limits shall be documented. |  |  |
| **5.6.2****Intermediate only** | Test and inspection results shall be recorded and reviewed regularly to identify trends.The significance of on-site and 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 taken promptly to address any exceedance of these limits.Where applicable, the measurement uncertainty associated with laboratory test results shall be considered. |  |  |
| **5.6.3****Basic and Intermediate** | The site shall ensure that a system of validation and ongoing verification of the shelf life is in place. This shall be based on risk and shall include sensory analysis and, as applicable, microbiological testing and relevant chemical factors such as pH and aw. Records and results from shelf-life tests shall verify the shelf-life period indicated on the product. |  |  |
| **5.6.4****Intermediate only** | Pathogen testing (including pathogens tested as part of the site’s environmental monitoring programme) shall be subcontracted to an external laboratory or, where conducted internally, the laboratory facility shall be fully segregated from the production and storage areas and have operating procedures to prevent any risk of contamination of products or production areas. |  |  |
| **5.6.5****Basic and Intermediate** | Where testing laboratories are present on a manufacturing site, they shall be located, designed and operated to eliminate potential risks to product safety. |  |  |
| **5.6.6****Basic and Intermediate** | Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO/ IEC 17025. Documented justification shall be available where accredited methods are not undertaken. |  |  |
| **5.7** | **Product release** |
| **Statement of intent** | The site shall ensure that finished product is not released unless all agreed procedures have been followed. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **5.7.1****Basic and Intermediate** | Where products require positive release, procedures shall be in place to ensure that release does not occur until all release criteria have been completed and the release has been authorised. |  |  |
| **6** | **Process control** |
| **6.1** | **Control of operations** |
| **Statement of intent** | The site shall operate to process specifications and/or work instructions/procedures that ensure the production of consistently safe and legal product with the desired quality characteristics, in full compliance with the HACCP or food safety plan. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **6.1.1****Basic and Intermediate** | Documented process specifications and work instructions/procedures shall be available for the key processes in the production of products to ensure product safety, legality and quality. The process specifications and work instructions/procedures (as appropriate) shall include:• recipes – including identification of any allergens• mixing instructions, speed, time• equipment process settings• cooking times and temperatures• cooling times and temperatures• labelling instructions• coding and shelf-life marking• storage conditions (e.g. storage temperatures)• any additional critical control points identified in the HACCP or food safety plan.Process specifications shall be in accordance with the agreed finished product specification.The site shall review the process specifications and work instructions/procedures prior to any changes which may affect food safety, legality and quality. |  |  |
| **6.1.3****Intermediate only** | Process monitoring, such as of temperature, time, pressure and chemical properties, shall be implemented, adequately controlled and recorded to ensure that product is produced within the required process specification. |  |  |
| **6.1.5****Basic and Intermediate** | Where variation in processing conditions may occur within equipment critical to the safety or quality of products, the processing characteristics shall be validated and verified at a frequency based on risk and performance of equipment (e.g. heat distribution in retorts, ovens and processing vessels; temperature distribution in freezers and cold stores). |  |  |
| **6.1.6****Basic and Intermediate** | In the case of equipment failure or deviation of the process from specification, procedures shall be in place to establish the safety status and quality of the product to determine the action to be taken. |  |  |
| **6.2** | **Labelling and pack control** |
| **Statement of intent** | The management controls of product labelling activities shall ensure that products will be correctly labelled and coded. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **6.2.3** **Basic and Intermediate**  | Procedures shall be in place to ensure that all products are packed into the correctpackaging and correctly labelled.  |  |  |
| **Intermediate only** | Procedures shall include checks:• at the start of packing• during the packing run (e.g. at predefined intervals and when printed packaging or labels are brought to the line during the production run)• when changing batches of packaging materials at the end of each production run.The checks shall also include verification of any printing carried out at the packing stage including, as appropriate:• date coding• batch coding• quantity indication• pricing information• bar coding• country of origin• allergen information. |  |  |
| **6.3** | **Quantity – weight, volume and number control** |
| **Statement of intent** | The site shall operate a quantity control system which conforms to legal requirements in the country where the product is sold and any additional industry sector codes or specified customer requirements. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **6.3.1****Intermediate only** | The frequency and methodology of quantity checking shall meet the requirements of the appropriate legislation governing quantity verification, and records of checks shall be retained. |  |  |
| **6.4** | **Calibration and control of measuring and monitoring devices** |
| **Statement of intent** | The site shall be able to demonstrate that measuring equipment is sufficiently accurate and reliable to provide confidence in measurement results. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **6.4.2****Basic and Intermediate** | All identified measuring devices, including new equipment, shall be checked and, where necessary, adjusted:• at a predetermined frequency, based on risk assessment• to a defined method traceable to a recognised national or international standard where possible.Results shall be documented. Equipment shall be readable and be of a suitable accuracy for the measurements it is required to perform. |  |  |
| **6.4.4****Basic and Intermediate** | Procedures shall be in place to record actions to be taken when the prescribed measuring devices are found not to be operating within specified limits. Where the safety or legality of products is based on equipment found to be inaccurate, action shall be taken to ensure at-risk product is not offered for sale. |  |  |
| **7** | **Personnel** |
| **7.1** | **Training: raw material handling, preparation, processing, packing and storage areas** |
| **Statement of intent** | The company shall ensure that all personnel performing work that affects product safety, legality and quality are demonstrably competent to carry out their activity, through training, work experience or qualification. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **7.1.4****Basic and Intermediate** | All relevant personnel, including engineers, agency-supplied staff, temporary staff and contractors, shall have received general allergen awareness training and be trained in the site’s allergen-handling procedures. |  |  |
| **7.1.6****Basic and Intermediate** | Records of all training shall be available. These shall include, at a minimum: • the name of the trainee and confirmation of attendance • the date and duration of the training • the title or course contents, as appropriate • the training provider. Where training is undertaken by agencies on behalf of the company, records of the training shall be available |  |  |
| **7.2** | **Personal hygiene: raw material handling, preparation, processing, packing and storage areas** |
| **Statement of intent** | The site’s personal hygiene standards shall be developed to minimise the risk of product contamination from personnel, be appropriate to the products produced and be adopted by all personnel, including agency-supplied staff, contractors and visitors to the production facility. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **7.2.1****Basic and Intermediate** | The requirements for personal hygiene shall be documented and communicated to all personnel. These shall include, at a minimum, the following: • watches and similar wearable devices shall not be worn • jewellery shall not be worn, with the exception of a plain wedding ring, wedding wristband or medical alert jewellery • rings and studs in exposed parts of the body, such as ears, noses and eyebrows, shall not be worn • fingernails shall be kept short, clean and unvarnished • false fingernails and nail art shall not be permitted • excessive perfume or aftershave shall not be worn. Compliance with the requirements shall be checked routinely |  |  |
| **7.2.2****Basic and Intermediate** | Hand-washing shall be performed on entry to the production areas and at a frequency that is appropriate to minimise the risk of product contamination. |  |  |
| **7.2.3****Basic and Intermediate** | All cuts and grazes on exposed skin shall be covered by an appropriately coloured plaster that is different from the product colour (preferably blue). These shall be site-issued and monitored. Where appropriate, in addition to the plaster, a glove shall be worn. |  |  |
| **7.3** | **Medical screening** |
| **Statement of intent** | The company shall have procedures in place to ensure that staff, agency staff, contractors or visitors are not a source of transmission of infectious diseases (including food-borne diseases) or conditions to products. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **7.3.1****Basic and Intermediate** | The site shall make employees aware of the symptoms of infection, disease or condition which would prevent a person working with open food. The site shall have a procedure which enables notification by staff, including temporary employees, contractors and visitors to site, of any relevant symptoms, infection, disease or condition with which they may have been in contact or be suffering from. |  |  |
| **7.3.2****Intermediate only** | Where there may be a risk to product safety, visitors and contractors shall be made aware of the types of symptoms, infection, disease or condition which would prevent a person visiting areas with open food. Where permitted by law, visitors shall be required to complete a health questionnaire or otherwise confirm that they are not suffering from any symptoms which may put product safety at risk, prior to entering the raw material, preparation, processing, packing and storage areas. |  |  |
| **7.3.3****Intermediate only** | There shall be procedures for employees, contractors and visitors relating to action to be taken where they may be suffering from or have been in contact with an infectious disease. Expert medical advice shall be sought where required. |  |  |
| **7.4** | **Protective clothing: staff or visitors to production areas** |
| **Statement of intent** | Suitable site-issued protective clothing shall be worn by employees, contractors or visitors working in or entering production areas. |
| **Clause/Level** | **Requirements** | **Conforms** | **Comments** |
| **7.4.1****Basic and Intermediate** | The company shall document and communicate to all employees (including agency and temporary personnel), contractors or visitors the rules regarding the wearing of protective clothing in specified work areas (e.g. production areas, storage areas etc.). This shall also include policies relating to the wearing of protective clothing away from the production environment (e.g. removal before entering toilets, and use of canteen and smoking areas). |  |  |
| **7.4.2****Basic and Intermediate** | Protective clothing shall be available that:• is provided in sufficient numbers for each employee• is of suitable design to prevent contamination of the product (at a minimum containing no external pockets above the waist or sewn-on buttons)• fully contains all scalp hair to prevent product contamination• includes snoods for beards and moustaches, where required, to prevent productcontamination. |  |  |
| **7.4.4****Basic and Intermediate** | Protective clothing shall be changed at an appropriate frequency, based on risk. |  |  |
| **8** | **High-risk, high-care and ambient high-care** |
| **Statement of intent** | The site shall be able to demonstrate that production facilities and controls are suitable to prevent pathogen contamination of products. |

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