**Global Standard START!, Issue 2**

S204: BRCGS Global Standard START! Issue 2 to BRCGS Global Standard Food Safety Issue 9 Transition Tool

Document Scope: This document provides a tool to help sites transition from BRCGS Global Standard START! (Issue 2) certification to BRCGS Global Standard Food Safety (Issue 9) certification. This tool can also be used by auditors for guidance.

Change log:

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| Version no. | Date | Description |
| 1 | 12/12/2024 | First version. |
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Version 1

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## 1 Introduction

Welcome to the BRCGS Global Standard START! to Food Safety Transition tool. Sites will find this useful when preparing to transition from START! to Food Safety. We have made this transition document for Intermediate level transitions.

It is essential to highlight that sites must ensure they comply with all requirements outlined in the Food Safety Standard to achieve certification. This tool is not a checklist. Where we refer to START! in this document we are referring to Global Standard START! (Issue 2). Where we refer to Food Safety – we are referring to BRCGS Global Standard Food Safety Standard (Issue 9).

This transition tool is the outcome of a gap analysis conducted between START! and Food Safety. The gap analysis was conducted to determine the differences between the two standards.

This document provides guidance for sites wishing to transition from START! to the full Food Safety Standard by helping them 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 between these two standards.

### 1.1 How to use the Transition Tool

This tool is designed to help assess a site’s operations against Food Safety requirements of the Standard when progressing from START! and to help prepare for a Food Safety certification audit.

While this tool will be useful in preparing for a Food Safety audit, 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 Food Safety certification.

Completing this transition tool may help sites identify any challenges which may affect their ability to progress from START! to Food Safety.

### 1.2 Further Information

If sites have any further questions about the START! to Food Safety Transition Tool or either of the Standards, please do not hesitate to contact the team.

Email – brcgs.enquiries@lgcgroup.com

## 2 Requirements

Where there are START! requirements equivalent to the Food Safety requirements, these are indicated by Level within the document as:

* Basic only
* Basic and Intermediate

and

* Intermediate only.

A site will have to achieve compliance to all requirements (as appropriate) as stated in the Global Food Safety Issue 9 Standard if transitioning from START! to Food Safety certification.

As an aid:

* Any differences between the requirements of the two Standards are highlighted in **bold** throughout the document.
* Where there is no equivalent requirements between the two Standards these are shaded in GREY.
* Where the requirement for BRCGS Food Safety issue 9 is the same as BRCGS START! issue 2 these requirements have not been included in this transition tool.

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| **1** | **Senior management commitment and continual improvement** |
| 1.1 | Senior management commitment and continual improvement |
|  **Fundamental SOI**The site’s senior management shall demonstrate that they are fully committed to the implementation of the requirements of the Global Standard Food Safety and to processes which facilitate continual improvement of food safety, quality management, and the site’s food safety and quality culture. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **1.1.2** |  | The site’s senior management shall define and maintain a clear plan for the development and continuing improvement of a food safety and quality culture. The plan shall include measures needed to achieve a positive culture change.**This shall include:**defined activities involving all sections of the site that have an impact on product safety. As a minimum, these activities shall be designed around:* **clear and open communication on product safety**
* **training**
* **feedback from employees**
* **the behaviours required to maintain and improve product safety processes**
* **performance measurement of activities related to the safety, authenticity, legality and quality of products**
* **an action plan indicating how the activities will be undertaken and measured, and the intended timescales**
* **a review of the effectiveness of completed activities.**

The plan shall be reviewed and updated at least annually, at a minimum. | Intermediate only | The site’s senior management shall define and maintain a clear plan for the development and continuing improvement of a food safety and quality culture. The plan shall include measures needed to achieve a positive culture change. |  |
| **1.1.3** | 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 this Standard. **These objectives shall be:*** documented and include targets or clear measures of success
* clearly communicated to all staff
* monitored and results reported at least quarterly to site senior management and all staff.
 | 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**. |  |
| **1.1.4** | Management review meetings attended by the site’s senior management shall be undertaken at appropriate planned intervals, annually at a minimum, to review the site performance against the Standard and objectives set in clause 1.1.3. **The review process shall include the evaluation of:*** previous management review action plans and timeframes
* the results of internal, second-party and/or third-party audits
* any objectives that have not been met, to understand the underlying reasons. This information shall be used when setting future objectives and to facilitate continual improvement
* any customer complaints and the results of any customer feedback
* any incidents (including both recalls and withdrawals), corrective actions, out-of-specification results and non-conforming materials
* the effectiveness of the systems for HACCP, food defence and authenticity, and the food safety and quality culture plan
* resource requirements.

**Records of the meeting shall be documented and used to revise the objectives, thereby encouraging continual improvement. The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff, and actions implemented within agreed timescales.** | Intermediate only | Management review meetings attended by the site’s senior management shall be undertaken at appropriate planned intervals, annually at a minimum, to review the site performance against the **START! programme** and objectives set in clause 1.1.3. |  |
| **1.1.5** | The site shall have a demonstrable meeting programme which enables food safety, authenticity, legality and quality issues to be brought to the attention of senior management. These meetings shall occur at least monthly. |  |  |  |
| **1.1.6** | The company shall have a confidential reporting system to enable staff to report concerns relating to product safety, authenticity, legality and quality.The mechanism (e.g. the relevant telephone number) for reporting concerns shall be clearly communicated to staff.The company’s senior management shall have a process for assessing any concerns raised. Records of the assessment and, where appropriate, actions taken, shall be documented. |  |  |  |
| **1.1.7** |  | The company’s senior management shall provide the human and financial resources required to produce safe, authentic, legal products to the specified quality and in compliance with the requirements of this Standard. | Basic and Intermediate | The company’s senior management shall provide the human and financial resources required to produce safe, authentic, legal products to the specified quality and in compliance with the requirements of **the START! Programme**. |  |
| **1.1.8** | The company’s senior management shall have a system in place to ensure that the site is kept informed of and reviews:* scientific and technical developments
* industry codes of practice
* new risks to authenticity of raw materials
* all relevant legislation in the country where the product will be sold (where known).
 | 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.** |  |
| **1.1.9** | The site shall have a genuine, original hard copy or electronic version of the current Standard available and be aware of any changes to the Standard or protocol that are published on the BRCGS website. |  |  |  |
| **1.1.10** | Where the site is certificated to the Standard, it shall ensure that announced or blended announced recertification audits occur on or before the audit due date indicated on the certificate. |  |  |  |
| **1.1.11** |  | The most senior production or operations manager on site shall participate in the opening and closing meetings of the audit for certification to the Standard.Relevant departmental managers or their deputies shall be available as required during the audit.**A member of the senior management team on site shall be available during the audit for a discussion on effective implementation of the food safety and quality culture plan.** | 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** | The site’s senior management shall ensure that the root causes of any non-conformities against the Standard identified at the previous audit have been effectively addressed to prevent recurrence. | 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. |  |
| **1.1.13** | The BRCGS logo and references to certification status shall be used only in accordance with the conditions of use detailed in the audit protocol section (Part III, section 6.7) of the Standard. |  |  |  |
| **1.2** | Organisational structure, responsibilities and management authority |
| **SOI**  | The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality and quality. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **1.2.2** | The site’s senior management shall ensure that all staff are aware of their responsibilities and demonstrate that work is carried out in accordance with documented site policies, procedures, work instructions and existing practices for activities undertaken. **All staff shall have access to relevant documentation** | Intermediate only | The site’s senior management shall ensure that all staff are aware of their responsibilities and work in accordance with site policies, procedures, work instructions and existing practices for activities undertaken. |  |
| **1.2.3** | Staff shall be aware of the need to report any risks or any evidence of unsafe or out-of-specification product, equipment, packaging or raw materials, to a designated manager to enable the resolution of issues requiring immediate action. |  |  |  |

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| **Comments** |  |

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| **2** | The food safety plan – HACCP |
| **Fundamental SOI** 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **2.1.2** | The scope of each HACCP or food safety plan, including the products and processes covered, shall be defined. |  |  |  |
| **2.2** | Prerequisite programmes |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **2.2.1** |  | The site shall establish and maintain environmental and operational programmes necessary to create an environment suitable to produce safe and legal food products (prerequisite programmes). As a guide these may include the following, although this is not an exhaustive list:* cleaning and disinfection (see section 4.11)
* pest management (see section 4.14)
* maintenance programmes for equipment and buildings (see sections 4.4 and 4.6)
* personal hygiene requirements (see section 7.2)
* staff training (see section 7.1)
* supplier approval and purchasing (see section 3.5.1)
* transportation arrangements (see section 4.16)
* processes to prevent cross-contamination (see sections 4.9 and 4.10)
* allergen management (see section 5.3).

The prerequisite programmes for the particular areas of the site shall take into account the production risk zoning **(see clause 4.3.1).**The control measures and monitoring procedures for the prerequisite programmes shall be clearly documented and shall be included within the development and reviews of the HACCP or food safety plan. | Basic and Intermediate | The site shall establish and maintain environmental and operational programmes necessary to create an environment suitable to produce safe and legal food products (prerequisite programmes). |  |
| Intermediate Only | As a guide these may include the following, although this is not an exhaustive list:• cleaning and disinfection • pest management• maintenance programmes for equipment and buildings • personal hygiene requirements• staff training• supplier approval and purchasing• transportation arrangements• processes to prevent cross-contamination• allergen management.The prerequisite programmes for the particular areas of the site shall take into account the production risk zoning. The control measures and monitoring procedures for the prerequisite programmes must be clearly documented and shall be included within the development and reviews of the HACCP or food safety plan. |
| **2.3** | Describe the product (equivalent to Codex Alimentarius Step 2) |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **2.3.2** | All relevant information needed to conduct the hazard analysis shall be collected, maintained, documented and updated. The company shall ensure that the HACCP or food safety plan is based on comprehensive information sources, which are referenced and available on request. As a guide, this may include the following, although this is not an exhaustive list:* the latest scientific literature
* historical and known hazards associated with specific food products
* relevant codes of practice
* recognised guidelines
* food safety legislation relevant for the production and sale of products
* customer requirements
* a copy of any existing site HACCP plans (e.g. for products already in production at the site)
* a map of the premises and equipment layout (see clause 4.3.2)
* a water distribution diagram for the site (see clause 4.5.2)

indication of any areas (zones) where high-risk, high-care or ambient high-care production facilities are required (see clause 4.3.1). |  |  |  |
| **2.7** | List all potential hazards associated with each process step, conduct a hazard analysis and consider any measures to control identified hazards (equivalent to Codex Alimentarius Step 6, Principle 1) |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **2.7.2** | The HACCP food safety team shall conduct a hazard analysis to identify the significant hazards (i.e. those hazards that are reasonably likely to occur at an unacceptable level), which need to be prevented, eliminated or reduced to acceptable levels. Consideration shall be given to the following:* likely occurrence of hazard
* severity of the effects on consumer safety
* vulnerability of those exposed
* survival and multiplication of micro-organisms of specific concern to the product
* presence or production of toxins, chemicals or foreign bodies
* contamination of raw materials, intermediate/semi-processed product, or finished product.

**Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented.** | Basic and Intermediate | A hazard analysis shall be conducted to identify significant hazards (i.e. those hazards that are reasonably likely to occur at an unacceptable level), which need to be prevented, eliminated or reduced to acceptable levels. Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined and documented. |  |
| Intermediate Only | Consideration shall be given to the following:• likely occurrence of hazard• severity of the effects on consumer safety• vulnerability of those exposed• survival and multiplication of micro-organisms of specific concern to the product• presence or production of toxins, chemicals or foreign bodies• contamination of raw materials, intermediate/semi-processed product, or finished product. |
| **2.7.4** |  | Where the control of a specific food safety hazard is achieved through prerequisite programmes (see section 2.2) or control measures other than critical control points (CCPs; see clause 2.8.1), this shall be stated and the adequacy of the programme to control the specific hazard validated. |  |  |  |

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| **Comments** |  |
| **3** | **Food safety and quality management system** |
| **3.4** | **Internal audits** |
| **Fundamental SOI**The company shall be able to demonstrate that it verifies the effective application of the food safety plan, and the implementation of the requirements of the Global Standard Food Safety and the site’s food safety and quality management system. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **3.4.1** | There shall be a scheduled programme of internal audits.At a minimum, the programme shall include at least four different audit dates spread throughout the year. The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All activities that form a part of the site’s food safety and quality systems, including those relevant to food safety, authenticity, legality and quality, shall be covered at least once each year.The scope of the internal audit programme shall include, although this is not an exhaustive list:* HACCP or food safety plan, including the activities to implement it (e.g. supplier approval, corrective actions and verification)
* prerequisite programmes (e.g. hygiene, pest management)
* food defence and food fraud prevention plans
* procedures implemented to achieve the Standard.

Each internal audit within the programme shall have a defined scope and consider a specific activity or a section of the HACCP or food safety plan. |  |  |  |
| **3.4.2** | Internal audits shall be carried out by appropriately trained, competent auditors. Auditors shall be independent (i.e. not audit their own work). |  |  |  |
| **3.4.3** | The internal audit programme shall be fully implemented. Internal audit reports shall identify conformity as well as non-conformity and include objective evidence of the findings.The results shall be reported to the personnel responsible for the activity audited.Corrective and preventive actions, and timescales for their implementation, shall be agreed and their completion verified. All non-conformities shall be handled as detailed in section 3.7. A summary of the results shall be reviewed in the management review meetings (see clause 1.1.4). |  |  |  |
| **3.4.4** | In addition to the internal audit programme, 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 and on any changes that may affect food safety, but shall be no less than once per month in open product areas.The results shall be reported to the personnel responsible for the activity or area audited.Corrective actions, and timescales for their implementation, shall be agreed and their completion verified.A summary of the results shall be reviewed in the management review meetings (see clause 1.1.4). | 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 |
| **Fundamental SOI** 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **3.5.1.1** | The company shall undertake a documented risk assessment of each raw material or group of raw materials, including primary packaging, to identify potential risks to product safety, authenticity, legality and quality. This shall take into account the potential for:* allergens (allergen content and potential contamination)
* foreign-body risks
* microbiological contamination
* chemical contamination
* variety or species cross-contamination
* substitution or fraud (see clause 5.4.2)
* any risks associated with raw materials which are subject to legislative control or customer requirements.

Consideration shall also be given to the significance of a raw material to the quality of the final product.The risk assessment shall form the basis for the raw material acceptance and testing procedure and for the processes adopted for supplier approval and monitoring.The risk assessment for a raw material shall be updated:* when there is a change in a raw material, the processing of a raw material, or the supplier of a raw material
* if a new risk emerges
* following a product recall or withdrawal, where a specific raw material has been implicated

at least every 3 years. |  |  |  |
| **3.5.1.2** | The company shall have a documented supplier approval procedure to ensure that all suppliers of raw materials, including primary packaging, effectively manage risks to raw material quality and safety and are operating effective traceability processes. The approval procedure shall be based on risk **and include either one or a combination of:*** a valid certification to the applicable BRCGS Standard or GFSI-benchmarked standard. The scope of the certification shall include the raw materials purchased

**or*** supplier audits, with a scope to include product safety, traceability, HACCP review, the product security and food defence plan, the product authenticity plan and good manufacturing practices. The audit shall ensure that these plans form part of the supplier’s product safety management system and that any resultant actions are implemented. The supplier audit shall be undertaken by an experienced and demonstrably competent product safety auditor. Where the supplier audit is completed by a second or third party, the company shall be able to:
* **demonstrate the competency of the auditor**
* **confirm that the scope of the audit includes product safety, product security and food defence plan, product authenticity, traceability, HACCP review and good manufacturing practices**
* **obtain and review a copy of the full audit report**

**or**where a valid risk-based justification is provided and the supplier is assessed as low risk only, a completed supplier questionnaire may be used for initial approval. At a minimum, the questionnaire shall have a scope that includes product safety, product security and food defence, product authenticity, traceability, HACCP review and good manufacturing practices. The questionnaire shall have been reviewed and verified by a demonstrably competent person. | Basic and Intermediate | 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** | There shall be a documented process for ongoing supplier performance review, based on risk and defined performance criteria. The process shall be fully implemented.Where approval is based on questionnaires, these shall be reissued at least every 3 years and suppliers shall be required to notify the site of any significant changes in the interim, including any change in certification status.Records of the review shall be kept. | 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. |  |
| **3.5.1.5** | Where raw materials (including primary packaging) are purchased from companies that are not the manufacturer, packer or consolidator (e.g. purchased from an agent, broker or wholesaler), the site shall know the identity of the last manufacturer or packer, or for bulk commodity products the consolidation place of the raw material.Information to enable the approval of the manufacturer, packer or consolidator, as in clauses 3.5.1.1 and 3.5.1.2, shall be obtained from the agent/broker or directly from the supplier, unless the agent/broker is themselves certificated to a BRCGS Standard (e.g. Global Standard Agents and Brokers) or a standard benchmarked by GFSI. |  |  |  |
| **3.5.1.6** | The company shall ensure that its suppliers of raw materials (including primary packaging) have an effective traceability system. Where a supplier has been approved based on a questionnaire instead of certification or audit, verification of the supplier’s traceability system shall be carried out on first approval and then at least every 3 years. This may be achieved by a traceability test.Where the supplier is not the manufacturer, packer or consolidator of the raw material (e.g. purchased from an agent, broker or wholesaler) and approval is based on a questionnaire instead of certification or audit, the verification of the traceability system shall be carried out on the last manufacturer, packer or consolidator of the raw material.Where a raw material is received directly from a farm or fish farm, further verification of the farm’s traceability system is not mandatory. |  |  |  |
| **3.5.1.7** | The procedures shall define the actions required in either of the following circumstances:* an exception to the supplier approval processes in clause 3.5.1.2 occurs (e.g. where raw material suppliers are prescribed by a customer)
* information for effective supplier approval is not available (e.g. bulk agricultural commodity products).

In both the above situations, product testing is used to verify product quality and safety.When a site produces customer-branded product, the customer shall be made aware of the relevant exceptions. |  |  |  |
| **3.5.2** | Raw material and packaging acceptance, monitoring and management procedures |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **3.5.2.1** |  | **The company shall have a procedure for the acceptance of raw materials and primary packaging on receipt based upon the risk assessment (clause 3.5.1.1). Acceptance of raw materials (including primary packaging) and their release for use shall be based on either one or a combination of:*** product sampling and testing
* visual inspection on receipt
* certificates of analysis (specific to the consignment)
* certificates of conformance.

**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.** | Basic and Intermediate | 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. |
| **3.5.2.2** |  | Procedures shall be in place to ensure that approved changes to raw materials (including primary packaging) are communicated to goods receipt personnel and that only the correct version of the raw material is accepted. For example, when labels or printed packaging have been amended, only the correct version should be accepted and released into production. |  |  |  |
| **3.5.3** | Management of suppliers of services |
| **SOI** | The company shall be able to demonstrate that where services are outsourced, the service is appropriate and any risks presented to food safety, authenticity, legality and quality have been evaluated to ensure effective controls are in place. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **3.5.3.1** | **There shall be a procedure for the approval and monitoring of suppliers of services.** Such services shall include, as appropriate:* 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.

**This approval and monitoring process shall be risk-based and take into consideration:*** risk to the safety and quality of products
* compliance with any specific legal requirements
* potential risks to the security of the product (i.e. risks identified in the vulnerability and food defence assessments).
 | 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.
 |  |
| **3.5.3.2** | Contracts or formal agreements shall exist with the suppliers of services that clearly define service expectations and ensure that the potential food safety risks associated with the service have been addressed. |  |  |  |
| **3.5.3.3** | There shall be a documented process for ongoing performance review of suppliers of services, based on risk and defined performance criteria. The process shall be fully implemented.Records of the review shall be kept. |  |  |  |
| **3.5.4** | Management of outsourced processing |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **3.5.4.2** | The company shall ensure that outsourced processors are approved and monitored, to ensure that they effectively manage risks to product safety and quality and are operating effective traceability processes.The approval and monitoring procedure shall be based on risk and include either one or a combination of:* a valid certification to the applicable BRCGS Standard or GFSI-benchmarked standard. The scope of the certification shall include the activities completed for the site

or* supplier audits, with a scope to include product safety, traceability, HACCP review, product security and food defence plan, product authenticity plan and good manufacturing practices. The audit shall ensure that these plans form part of the supplier’s product safety management system and that any resultant actions are implemented. The supplier audit shall be undertaken by an experienced and demonstrably competent product safety auditor. Where this supplier audit is completed by a second or third party, the company shall be able to:
* demonstrate the competency of the auditor
* confirm that the scope of the audit includes product safety, traceability, HACCP review, product security and food defence plan, product authenticity plan and good manufacturing practices
* obtain and review a copy of the full audit report.

There shall be a documented process for ongoing supplier performance review, based on risk and defined performance criteria. The process shall be fully implemented. Records of the review shall be kept. |  |  |  |
| **3.5.4.3** | Where any processes are outsourced, including production, manufacture, processing or storage, the risks to the product safety, authenticity and legality shall form part of the site’s food safety plan (HACCP plan). |  |  |  |
| **3.5.4.4** | Requirements for outsourced processing shall be agreed and documented in a service specification (similar to a finished product specification). This shall include any specific handling requirements for the products. |  |  |  |
| **3.5.4.6** | The company shall establish inspection and test procedures for products where part of the processing has been outsourced, including visual, chemical and/or microbiological testing.The frequency and methods of inspection or testing shall depend on risk assessment. |  |  |  |
| **3.6** | Specifications |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **3.6.2** | Accurate, up-to-date specifications shall be available for all finished products. **These may be in the form of a printed or electronic document, or part of an online specification system.****They** shall include key data to meet customer and legal requirements and assist the user in the safe usage of the product. | Basic and Intermediate | Accurate, up-to-date specifications shall be available for all finished products. These shall include key data to meet customer and legal requirements and assist the user in the safe usage of the product. |  |
| **3.6.4** | Specification review shall be sufficiently frequent to ensure that data is current or at a minimum every 3 years, taking into account product changes, suppliers, regulations and other risks.Reviews and changes shall be documented. |  |  |  |
| **3.7** | Corrective and preventive actions |
| **Fundamental SOI** The site shall be able to demonstrate that it uses the information from identified issues in the food safety and quality management system **(e.g. non-conforming products, internal audits, complaints, product recalls, product testing, second- and third-party audits and online reviews)** to complete necessary corrective actions and prevent recurrence. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **3.7.2** |  | Where a non-conformity places the safety, authenticity or legality of a product at risk, or where there is an adverse trend in quality, this shall be investigated and recorded including:* clear documentation of the non-conformity
* assessment of consequences by a suitably competent and authorised person
* the corrective action to address the immediate issue
* completion of root cause analysis to identify the fundamental cause (root cause) of the non-conformity
* appropriate timescales for corrective and preventive actions
* the person(s) responsible for corrective and preventive actions
* **verification that the corrective and preventive actions have been implemented and are effective.**

Root cause analysis shall also be used to prevent recurrence of non-conformities, and to implement ongoing improvements when analysis of non-conformities for trends shows there has been a significant increase in a type of non-conformity. | Intermediate only | Where a non-conformity places the safety, legality or quality of products at risk or where there is an adverse trend in quality, this shall be investigated and recorded including:* clear documentation of the non-conformity
* assessment of consequences by a suitably competent and authorised person
* the corrective action to address the immediate issue
* completion of root cause analysis to identify the fundamental cause (root cause) of the non- conformity.

Root cause analysis shall also be used to prevent recurrence of non-conformities, and to implement ongoing improvements when analysis of non- conformities for trends shows there has been a significant increase in a type of non-conformity. |  |
| **3.9** | Traceability |
| **Fundamental SOI**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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **3.9.3** | The site shall test the traceability system across the range of product groups to ensure traceability can be determined from the supplier of 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.**The traceability test shall include a summary of the documents that should be referenced during the test, and clearly show the links between them. The test shall occur at a predetermined frequency, at a minimum annually, and results shall be retained for inspection. Traceability should be achievable within 4 hours.** | 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. |  |

|  |  |
| --- | --- |
| **Comments** |  |
| **4** | **Site standards** |
| **4.2** | Food Defence |
| **SOI** | Systems shall protect products, premises and brands from malicious actions while under the control of the site. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.2.1** | Where personnel are engaged in threat assessments and food defence plans, the individual or team responsible shall understand potential food defence risks at the site. This shall include knowledge of both the site and the principles of food defence.Where there is a legal requirement for specific training, this shall be in place. |  |  |  |
| **4.2.2** | 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. **It shall be formally reviewed at least annually and whenever:*** a new risk emerges (e.g. a new threat is publicised or identified)
* an incident occurs where product security or food defence is implicated.

**Where applicable, the food defence plan shall meet the legal requirements in the country of sale or intended use.** | 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 threat assessment plan. This plan shall be kept under review to reflect changing circumstances and market intelligence.  |
| **4.2.3** | Where raw materials or products are identified as being at particular risk, the food defence plan shall include controls to mitigate these risks. Where prevention is not sufficient or possible, systems shall be in place to identify any tampering.These controls shall be monitored, the results documented, and the controls reviewed at least annually. |  |  |  |
| **4.3** | Layout, product flow and segregation |
| **Fundamental SOI**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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.3.1** | The site shall assess the production risk zones required for the products manufactured, processed or packed at the site, using the definitions in Appendix 2 of the Standard. |  |  |  |
| **4.3.3** | Contractors and visitors, including drivers, shall be made aware of the requirements of the areas they are visiting, with special reference to hazards and potential product contamination. |  |  |  |
| **4.3.6** |  | Temporary structures constructed during building work or refurbishment etc. shall be designed and located to avoid pest harbourage and ensure the safety and quality of products. |  |  |  |
| **4.4** | Building fabric, raw material handling, preparation, processing, packing and storage areas |
| **SOI** | The fabrication of the site, buildings and facilities shall be suitable for the intended purpose. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.4.5** | Where suspended ceilings or roof voids are present, adequate access to the void shall be provided to facilitate inspection for pest activity, unless the void is fully sealed. |  |  |  |
| **4.4.6** | Where elevated walkways, access steps or mezzanine floors are adjacent to or pass over production lines which have open products, they shall be:* designed to prevent contamination of products and production lines
* easy to clean
* correctly maintained.
 |  |  |  |
| **4.5** | Utilities – water, ice, air and other gases |
| **SOI** | Utilities used within the production and storage areas shall be monitored to effectively control the risk of product contamination. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.5.2** |  | An up-to-date schematic diagram shall be available of the water distribution system on site, including water source, holding tanks, water treatment and water recycling as appropriate. The diagram shall be used as a basis for water sampling and the management of water quality. |  |  |  |
| **4.6** | Equipment |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.6.1** | There shall be a documented purchase specification for any new equipment detailing the site requirements for the equipment. This may, for example, include:* any relevant legislation
* where applicable, requirements for food contact surfaces to meet legal requirements
* details of intended use of the equipment and the type of materials it will be handling.

Depending on its intended use, new equipment to site (including second-hand equipment) may require authorisation from a multi-disciplinary team.The supplier should provide evidence that equipment meets these site requirements prior to supply. |  |  |  |
| **4.6.2** | **The design and construction of equipment shall be based on risk, to prevent product contamination. For example, the use of the correct seals, impervious surfaces or smooth welds and joints, where they are exposed to product and could otherwise result in foreign-body, microbiological or allergen contamination of the product.**Equipment that is in direct contact with food shall be suitable for food contact and meet legal requirements where applicable. | Basic and Intermediate | Equipment that is in direct contact with food shall be suitable for food contact and meet legal requirements where applicable. |  |
| **4.6.3** |  | A documented, risk-based commissioning procedure shall be in place to ensure that food safety and integrity is maintained during the installation of new equipment to site.Installation work shall be followed by a documented hygiene clearance procedure.New equipment to site shall be inspected by an authorised member of staff before being accepted into operation.The commissioning procedure shall include the update of any other site procedures that are affected by the new equipment, for example, training, operating procedures, cleaning, environmental monitoring, maintenance schedules or internal audits.The design and placement of equipment shall ensure that it can be effectively cleaned and maintained. |  |  |  |
| **4.6.4** | A procedure shall be in place to manage the movement of static equipment in production areas, to ensure that food safety is managed and the integrity of the equipment is maintained. |  |  |  |
| **4.6.5** | **Equipment that is not used or is taken out of service shall be cleaned and stored in a manner that does not pose a risk to the product.****Equipment stored in internal production and storage areas shall be kept clean.**Food contact equipment that has been stored but is not in daily use shall be cleaned and, where necessary, disinfected prior to use. | 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. |  |
| **4.6.6** | Mobile equipment (e.g. forklift trucks, pallet trucks, scissor lifts and ladders) used in open product areas shall not pose a risk to the product.Where the use of mobile equipment in external areas cannot be avoided and poses a risk to the product, the equipment shall be cleaned and disinfected prior to entering production areas. |  |  |  |
| **4.6.7** | Battery-charging equipment shall not be stored in open product areas (unless the batteries are fully sealed and/or maintenance-free) or where there is a risk to products. |  |  |  |
| **4.7** | Maintenance |
| **SOI** | An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.7.1** | There shall be a planned preventive maintenance schedule or condition monitoring system which includes all plant, processing equipment **and mobile equipment.** The maintenance requirements shall be defined when commissioning new equipment **and reviewed after repairing existing equipment.** | 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. |  |
| **4.7.5** | Materials and parts used for equipment and plant maintenance shall be of an appropriate grade or quality.**Those materials (such as lubricating oil) that pose a risk by direct or indirect contact with raw materials (including primary packaging), intermediate products and finished products shall be food grade and of a known allergen status.** | Intermediate only | Materials and parts used for equipment and plant maintenance shall be of an appropriate grade or quality. |  |
| **4.7.6** | Engineering workshops shall be kept clean and tidy, and controls shall be in place to prevent transfer of engineering debris to production or storage areas. |  |  |  |
| **4.8** | Staff facilities |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.8.2** | Storage facilities of sufficient size to accommodate personal items shall be provided for all personnel who work in raw material-handling, preparation, processing, packing and storage areas. |  |  |  |
| **4.8.8** |  | Where catering facilities (including vending machines) are provided on the premises, they shall be suitably controlled to prevent contamination of products (e.g. as a source of food poisoning, the use of allergenic ingredients or introduction of new allergenic material to the site). |  |  |  |
| **4.9** | Chemical and physical product contamination control: raw material-handling, preparation, processing, packing and storage areas |
| **SOI** | Appropriate facilities and procedures shall be in place to control the risk of chemical or physical contamination of product. |  |
| **4.9.1** | Chemical control |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.9.1.2** | Where strongly scented or taint-forming materials have to be used, for instance for building work, procedures shall be in place to prevent the risk of taint contamination of products. |  |  |  |
| **4.9.2** | Metal control |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.9.2.1** | There shall be a documented policy for the controlled use and storage of sharp metal implements including knives, cutting blades on equipment, needles and wires. This shall include a record of inspection for damage and the investigation of any lost items. Snap-off blade knives shall not be used. |  |  |  |
| **4.9.3** | Glass, brittle plastic, ceramics and similar materials |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.9.3.2** | Procedures for handling glass and other brittle materials (other than product packaging) shall be in place where open products are handled or there is a risk of product contamination. These procedures shall include, at a minimum:* a list of items detailing location, number, type and condition
* recorded checks of the condition of items, carried out at a specified frequency that is based on the level of risk to the product
* details on cleaning or replacing items to minimise the potential for product contamination.
 |  |  |  |
| **4.9.4** | Products packed into glass or other brittle containers |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.9.4.1** | The storage of the containers shall be segregated from the storage of raw materials, product or other packaging. |  |  |  |
| **4.9.4.3** |  | Records shall be maintained of all container breakages on the line. Where no breakages have occurred during a production period, this shall also be recorded. This record shall be reviewed to identify trends and potential line or container improvements. |  |  |  |
| **4.9.6** | Other physical contaminants |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.9.6.1** |  | Procedures shall be in place to prevent physical contamination of raw materials by raw material packaging (e.g. during debagging and deboxing procedures to remove the packaging). |  |  |  |
| **4.9.6.2** |  | Portable handheld equipment, e.g. stationery items (pens, pencils etc.), mobile phones, tablets and similar portable items used in open product areas, shall be controlled by the site to minimise the risk of physical contamination. The site may consider, for example:* excluding non-approved items
* restricting the use to site-issued equipment
* ensuring stationery items such as pens are designed without small external parts and are detectable by foreign-body detection equipment, or are used in designated areas where contamination is prevented.
 |  |  |  |
| **4.10** | Foreign-body detection and removal equipment |
| **SOI** | The risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies |  |
| **4.10.3** | Metal detectors and X-ray equipment |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.10.3.1** | Metal detection equipment shall be in place unless risk assessment demonstrates that this does not improve food safety. Where metal detectors are not used, justification shall be documented. The absence of metal detection would only normally be based on the use of an alternative, more effective method of protection (e.g. use of X-ray, fine sieves or filtration of products). |  |  |  |
| **4.10.3.3** | The site shall establish and implement procedures for the operation and testing of the metal detection or X-ray equipment. This shall include, at a minimum:* responsibilities for the testing of equipment
* the operating effectiveness and sensitivity of the equipment and any variation to this for particular products
* the methods and frequency of checking the detector
* recording of the results of checks.
 |  |  |  |
| **4.10.3.4** | Metal detector testing procedures shall, at a minimum, include:* use of test pieces incorporating a sphere of metal of a known diameter selected on the basis of risk. The test pieces shall be marked with the size and type of test material contained
* tests carried out using separate test pieces containing ferrous metal, stainless steel and typically non-ferrous metal, unless the product is within a foil container where a ferrous-only test may be applicable
* a test to prove that both the detection and rejection mechanisms are working effectively under normal working conditions
* tests of the metal detector by passing successive test packs through the unit at typical line operating speed
* checks of failsafe systems fitted to the detection and rejection systems.

In addition, where metal detectors are incorporated on conveyors, the test piece shall be passed as close as possible to the least sensitive area of the metal detector (usually the centre of the metal detector aperture). Wherever possible, the test piece shall be inserted within a clearly identified sample pack of the food being produced at the time of the test.Where in-line metal detectors are used, the test piece shall be placed in the product flow wherever this is possible, and the correct timing of the rejection system to remove identified contamination shall be validated. Testing of in-line metal detectors shall be completed during both line start-up and at the end of the production period. |  |  |  |
| **4.10.3.5** | X-ray equipment testing procedures shall, at a minimum, include:* use of test pieces incorporating a sphere of suitable material (e.g. a typical contaminant) of a known diameter selected on the basis of risk. The test pieces shall be marked with the size and type of test material contained
* tests carried out using separate test pieces
* a test to prove that both the detection and rejection mechanisms are working effectively under normal working conditions
* tests of the X-ray equipment by passing successive test packs through the unit at typical line operating speed
* checks of failsafe systems fitted to the detection and rejection systems.

In addition, where X-ray equipment is incorporated on conveyors, the test piece shall be passed as close as possible to the least sensitive area of the X-ray equipment (e.g. this may be close to the X-ray source or close to the X-ray equipment). Wherever possible, the test piece shall be inserted into a clearly identified sample pack of the food being produced at the time of the test.Where in-line X-ray equipment is used, the test piece shall be placed in the product flow wherever this is possible, and the correct timing of the rejection system to remove identified contamination shall be validated. Testing of in-line equipment shall be completed both during line start-up and at the end of the production period. |  |  |  |
| **4.10.4** | Magnets |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.10.4.1** |  | The type, location and strength of magnets shall be fully documented.Procedures shall be in place for the inspection, cleaning, strength testing and integrity checks of magnets used for food safety purposes, including final product testing, e.g. to remove product contamination. Records of all checks shall be maintained. |  |  |  |
| **4.10.5** | Optical sorting equipment |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.10.5.1** | Optical sorting equipment used for final product testing shall be checked in accordance with the manufacturer’s instructions or recommendations. Checks shall be documented. |  |  |  |
| **4.10.6** | Container cleanliness – glass jars, cans and other rigid containers |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.10.6.2** | The effectiveness of the container-cleaning equipment shall be checked and recorded during each production. Where the system incorporates a rejection system for dirty or damaged containers, the check shall incorporate a test of both the detection and effective rejection of the test container. |  |  |  |
| **4.10.7** | Other foreign-body detection and removal equipment |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.11** | Housekeeping and hygiene |
| **Fundamental SOI**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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.11.3** | Limits of acceptable and unacceptable cleaning performance shall be defined for food contact surfaces and processing equipment. These limits shall be based on the potential hazards relevant to the product or processing area (e.g. microbiological, allergen, foreign-body or product-to-product contamination). Therefore, acceptable levels of cleaning may be defined by visual appearance, ATP bioluminescence techniques (see glossary), microbiological testing, allergen testing or chemical testing as appropriate.The site shall define the corrective action to be taken when monitored results are outside of the acceptable limits.Where cleaning procedures are part of a defined prerequisite plan to control the risk of a specific hazard, the cleaning and disinfection procedures and their frequency shall be validated and records maintained. This shall include the risk from cleaning chemical residues on food contact surfaces. |  |  |  |
| **4.11.5** |  | The cleanliness of equipment shall be checked before equipment is released back into production. The results of checks on cleaning, including visual, analytical and microbiological checks, shall be recorded and used to identify trends in cleaning performance and to instigate improvements where required. |  |  |  |
| **4.11.7** | Cleaning in place (CIP) |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.11.7.1** | All CIP equipment shall be designed and constructed to ensure effective operation. This shall include:* validation confirming the correct design and operation of the system
* an up-to-date schematic diagram of the layout of the CIP system
* where rinse solutions are recovered and re-used, an assessment of the risk of cross-contamination (e.g. due to the re-introduction of an allergen or the existence of different production risk zones within the site).

Alterations or additions to the CIP system shall be authorised by a suitably competent individual before changes are made. A record of changes shall be maintained.The system shall be revalidated at a frequency based on risk, and following any alteration or addition. |  |  |  |
| **4.11.7.2** | Limits of acceptable and unacceptable performance for key process parameters shall be defined to ensure the removal of target hazards (e.g. soil, allergens, micro-organisms, spores). At a minimum these parameters shall include:* times for each stage
* detergent concentrations
* flow rate and pressure
* temperatures.

These shall be validated and records of the validation maintained. |  |  |  |
| **4.11.7.3** | The CIP equipment shall be maintained by suitably trained staff to ensure effective cleaning is carried out. **This shall include:*** routine checking of detergent concentrations
* monitoring of recovered post-rinse solutions for build-up of carry-over from the detergent tanks
* cleaning and inspection of filters, where fitted, at a defined frequency
* storing flexible hoses (where used) hygienically when not in use, and inspecting them at a defined frequency to ensure that they are in good condition.
 | Intermediate only | The CIP equipment shall be maintained by suitably trained staff to ensure effective cleaning is carried out. |  |
| **4.11.7.4** | CIP facilities, where used, shall be monitored at a defined frequency based on risk. **This may include:*** monitoring of process parameters defined in clause 4.11.7.2
* ensuring correct connections, piping and settings are in place
* confirming the process is operating correctly (e.g. valves are opening/closing sequentially, spray balls are operating correctly)
* ensuring effective completion of the cleaning cycle
* monitoring for effective results, including draining where required.

**Procedures shall define the action to be taken if monitoring indicates that processing is outside the defined limits.** | Intermediate only | CIP facilities, where used, shall be monitored at a defined frequency based on risk. |  |
| **4.11.8** | Environmental monitoring |
| Section 4.11.8 not included in START! Standard, no requirements to compare. |
| **SOI** | Risk-based environmental monitoring programmes shall be in place for relevant pathogens or spoilage organisms. At a minimum, these shall include all production areas with open and/or ready-to-eat products. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.11.8.1** | The design of the environmental monitoring programme shall be based on risk, and at a minimum include:• sampling procedures• identification of sample locations• frequency of tests• target organism(s) (e.g. pathogens, spoilage organisms and/or indicator organisms)• test methods (e.g. settle plates, rapid testing and swabs)• recording and evaluation of results.The programme and its associated procedures shall be documented. |  |  |  |
| **4.11.8.2** | Appropriate control or action limits shall be defined for the environmental monitoring programme.The company shall document the corrective action to be taken when monitored results indicate a failure to meet a control limit, or when monitored results indicate an upward trend of positive results (i.e. a trend towards a control or action limit). |  |  |  |
| **4.11.8.3** | The company shall review the environmental monitoring programme at least annually and whenever there are:• changes in processing conditions, process flow or equipment which could impact the environmental monitoring programme• new developments in scientific information (e.g. new pathogens of concern)• failures of the programme to identify a significant issue (e.g. regulatory authority tests identifying positive results which the site programme did not)• product failures (products with positive tests)• consistently negative results (e.g. a site with a long history of negative results should review its programme to consider whether the correct parts of the factory are being tested, whether the testing is being conducted correctly, whether the tests are for the appropriate organisms, etc.) |  |  |  |
| **4.12** | Waste and waste disposal |
| **SOI** | Waste disposal shall be managed in accordance with legal requirements and to prevent accumulation, risk of contamination and the attraction of pests. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.12.3** | Waste removal from open product areas shall be managed to ensure that it does not compromise product safety. |  |  |  |
| **4.12.4** | If unsafe products or substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be a specialist in secure product or waste disposal and shall provide records which include the quantity of waste collected for destruction or disposal. |  |  |  |
| **4.13** | Management of surplus food and products for animal feed |
| Section 4.13 not included in START! Standard, no requirements to compare. |
| **SOI** | Effective processes shall be in place to ensure the safety and legality of by-products of the primary processing activity of the site. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.13.1** | Surplus customer-branded products shall be disposed of in accordance with customer-specific requirements. Customer brand names shall be removed from packed surplus products under the control of the factory before the product enters the supply chain, unless otherwise authorised by the customer. |  |  |  |
| **4.13.2** | Where customer-branded products which do not meet specifications are sold to staff or passed on to charities or other organisations, this shall be with the prior consent of the brand owner. Processes shall be in place to ensure that all products (own-branded and customerbranded) which are sold to staff or passed on to charities or other organisations are fit for consumption and meet legal requirements, and that their traceability is maintained. |  |  |  |
| **4.13.3** | By-products and downgraded/surplus products intended for animal feed shall be segregated from waste and protected from contamination during storage. Products for animal feed shall be managed in accordance with the relevant legislative requirements. |  |  |  |
| **4.14** | Pest management |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.14.2** | 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. **The risk assessment shall be reviewed whenever:*** there are changes to the building or production processes which could have an impact on the pest management programme
* there has been a significant pest issue.

Where the services of a pest management contractor are employed, the service scope shall be clearly defined and reflect the activities of the site.**Service provision, regardless of the source, shall meet with all applicable regulatory requirements.** | 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. |  |
| **4.14.7** | The site shall have adequate measures in place to prevent birds from entering buildings or roosting above loading or unloading areas. |  |  |  |
| **4.14.10** | An in-depth, documented pest management assessment shall be undertaken at a frequency based on risk, but at least annually, by a pest management expert to review the pest management measures in place. The assessment shall:* include an in-depth inspection of the site, equipment and facilities for pest activity
* review the existing pest management measures in place and make any recommendations for change.

The assessment shall be timed to allow access to equipment for inspection where a risk of stored product insect infestation exists. |  |  |  |
| **4.14.11** | Results of pest management inspections shall be assessed and analysed for trends on a regular basis. At a minimum, results of inspections shall be analysed:* annually or
* in the event of an infestation.

The analysis shall include results from trapping and monitoring devices to identify problem areas. The analysis shall be used as a basis for improving the pest management procedures. |  |  |  |
| **4.15** | Storage facilities |
| **SOI** | All facilities used for the storage of raw materials, packaging, in-process products and finished products shall be suitable for purpose. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.15.1** | Procedures to maintain product safety and quality during storage shall be developed on the basis of risk assessment, understood by relevant staff and implemented accordingly. These may include, as appropriate:* managing chilled and frozen product transfer between temperature-controlled areas
* segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergens) or taint uptake
* storing materials off the floor and away from walls
* specific handling or stacking requirements to prevent product damage.
 |  |  |  |
| **4.15.2** | Where appropriate, packaging shall be stored away from other raw materials and finished product. Any part-used packaging materials suitable for use shall be effectively protected from contamination and clearly identified to maintain traceability before being returned to an appropriate storage area. |  |  |  |
| **4.16** | Dispatch and transport |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **4.16.5** | The company shall have procedures for the transport of products, which shall include:* any restrictions on the use of mixed loads
* requirements for the security of products during transit, particularly when vehicles are parked and unattended
* clear instructions in the event of vehicle breakdown, accident or failure of refrigeration systems, which ensure that the safety of the products is assessed and records maintained.
 |  |  |  |
| **4.16.6** | Where the company uses contractors, it shall have a documented supplier approval procedure to ensure risks to food quality and safety are effectively managed during dispatch and transport operations. The approval procedure shall be based on risk and include either one or a combination of:* a valid certification to the applicable BRCGS Standard (e.g. Global Standard Storage and Distribution) or GFSI-benchmarked standard

or* a completed contract or terms and conditions. At a minimum, this shall include all the requirements of clauses 4.16.1 to 4.16.5. This shall have been reviewed and verified by a demonstrably competent person.
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| **5** | **Product control** |
| 5.1 | Product design/development |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **5.1.1** |  | The company shall have a procedure for new product development and changes to existing product, packaging and manufacturing processes.This procedure shall include any restrictions to the scope of new product development to control the introduction of hazards which would be unacceptable to the site or customers (e.g. the introduction of allergens, glass packaging, microbiological risks or the introduction of ingredients that may affect product claims). |  |  |  |
| **5.1.3** | Trials using production equipment shall be carried out where it is necessary to validate that product formulation and manufacturing processes are capable of producing a safe product of the required quality. |  |  |  |
| **5.1.4** | Initial shelf-life trials shall be undertaken using documented protocols that reflect conditions expected during manufacture, storage, transport/distribution, use and handling to determine product shelf life.Results shall be recorded and retained and shall confirm compliance with the relevant microbiological, chemical and organoleptic criteria or sensory analysis. Where shelf-life trials prior to production are impractical, for instance for some long-life products, a documented science-based justification for the assigned shelf life shall be produced. |  |  |  |
| **5.2** | Product labelling |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **5.2.2** | There shall be effective processes in place to ensure that labelling information is reviewed whenever changes occur to:* the product recipe
* raw materials
* the supplier of raw materials
* the country of origin of raw materials
* legislation.
 |  |  |  |
| **5.2.3** | Where the label information is the responsibility of a customer or a nominated second or third party, the company shall provide information:* to enable the label to be accurately created
* whenever a change occurs which may affect the label information.
 |  |  |  |
| **5.2.4** | Where cooking instructions are provided to ensure product safety, they shall be fully validated to ensure that, when the product is cooked according to the instructions, a safe, ready-to-eat product is consistently produced. |  |  |  |
| **5.3** | Management of allergens |
| **Fundamental SOI**The site shall have a system for the management of allergenic materials which minimises the risk of allergen contamination (cross-contact) of products and meets legal requirements for labelling in the country of sale. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **5.3.3** | A documented risk assessment shall be carried out to identify routes of contamination (cross-contact) and establish documented policies, and procedures for handling raw materials and intermediate and finished products, to ensure cross-contamination (cross-contact) is avoided. This assessment shall include:* consideration of the physical state of the allergenic material (e.g. powder, liquid, particulate)
* identification of potential points of cross-contamination (cross-contact) through the process flow
* assessment of the risk of allergen cross-contamination (cross-contact) at each process step
* identification of suitable controls to reduce or eliminate the risk of cross-contamination (cross-contact).
 |  |  |  |
| **5.3.7** | Where a claim is made regarding the suitability of a food for individuals with a food allergy or food sensitivity (sometimes referred to as a ‘food hyper-sensitivity’), the site shall ensure that the production process is fully validated to meet the stated claim and the effectiveness of the process is routinely verified. This shall be documented. |  |  |  |
| **5.4** | Product authenticity, claims and chain of custody |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **5.4.1** | Where personnel are engaged in vulnerability assessments, the individual or team responsible shall understand potential food fraud risks. This shall include knowledge of raw materials used by the site and the principles of vulnerability assessment. |  |  |  |
| **5.4.2** | The company shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of adulteration or substitution of raw materials (i.e. fraudulent raw materials). Such information may come from, for example:* trade associations
* government sources
* private resource centres
* activities completed for clause 1.1.8.
 |  |  |  |
| **5.4.3** | A documented vulnerability assessment shall be carried out on all food raw materials or groups of raw materials to assess the potential risk of adulteration or substitution. This shall take into account:* historical evidence of substitution or adulteration
* economic factors which may make adulteration or substitution more attractive
* ease of access to raw materials through the supply chain
* sophistication of routine testing to identify adulterants
* the nature of the raw material.

The output from this assessment shall be a documented vulnerability assessment plan.This plan shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risks. It shall be reviewed annually and whenever there is:* a change in raw materials or a supplier of raw materials
* emergence of a new risk (e.g. known adulteration of an ingredient or developments in scientific information associated with authenticity of the site’s products or raw materials, for example, information obtained as part of clause 1.1.8)
* following a significant product safety incident (e.g. a product recall) where the authenticity of the site’s products or raw materials is implicated.
 |  |  |  |
| **5.4.4** |  | Where raw materials are identified as being at particular risk of adulteration or substitution, the vulnerability assessment plan shall include appropriate assurance and/or testing processes to mitigate the identified risks. |  |  |  |
| **5.4.5** |  | 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. **These claims include:*** specific provenance or origin
* breed/varietal claims
* assured status (e.g. GLOBALG.A.P.)
* genetically modified organism (GMO) status
* identity preserved
* named specific trademarked ingredients.

**The facility shall maintain purchasing records, traceability of raw material usage and final product packing records to substantiate claims.** **The site shall undertake documented mass balance tests at a frequency to meet the particular requirements of any scheme it is certificated to, or in the absence of a scheme-specific requirement, at least one mass balance test every 6 months.** | 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. |  |
| **5.5** | Product Packaging |
| **SOI** | Product packaging and processes for the purchase of product packaging shall be appropriate for the intended use. Packaging shall be stored under conditions to prevent contamination and minimise deterioration. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **5.5.3** |  | The company shall have a procedure to manage obsolete packaging (including labels). This shall include:* mechanisms to prevent accidental use of obsolete packaging
* control and disposal of obsolete packaging
* appropriate procedures for the disposal of obsolete printed materials (e.g. rendering trademarked materials unusable).
 |  |  |  |
| **5.6** | Product inspection, on-site product testing and laboratory analysis |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **5.6.5** |  | Where testing laboratories are present on a manufacturing site, they shall be located, designed and operated to eliminate potential risks to product safety. **Controls shall be documented and implemented, and include consideration of:*** operating procedures to contain laboratory activities, including the design and operation of drainage and ventilation systems
* access and security of the facility
* movement of laboratory personnel
* hygiene and protective clothing arrangements
* movement of materials that may pose a risk to products, raw materials or the production area, into and out of the laboratory, including the disposal of laboratory waste
* the management and monitoring of laboratory equipment.

**Where testing activities are performed in production or storage areas (e.g. at the line tests or rapid tests), these shall be located, designed and operated to prevent product contamination.** | 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. |  |
| **5.6.7** | Procedures shall be in place to ensure reliability of laboratory results, other than those critical to safety and legality specified in clause 5.6.6. These shall include:* use of recognised test methods, where available
* documented testing procedures
* ensuring staff are suitably qualified and/or trained and competent to carry out the analysis required
* use of a system to verify the accuracy of test results (e.g. proficiency testing where applicable)
* use of appropriately calibrated and maintained equipment.
 |  |  |  |
| **5.8** | Pet food and animal feed |
| Section 5.8 not included in START! Standard, no requirements to compare. |
| Where a site produces pet food or animal feed, all the relevant requirements from sections 1–7 of the Standard must be fulfilled in addition to the requirements in this section. |
| SOI | The site shall ensure that pet food and animal feed products are safe and fit for intended use. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **5.8.1** | The site shall ensure that pet food and animal feed is formulated/designed for the intended use (e.g. where products are designed for complete diet or as a complementary product). |  |  |  |
| **5.8.2** |  | Where a site’s product range includes pet food or animal feed products for different animal species, the site shall have specific procedures for the management of any ingredients, raw materials, products or rework that could be harmful to unintended recipients. |  |  |  |
| **5.8.3** | Where the site manufactures, processes or packs pet food or animal feed products that contain medicinal substances, the site shall have specific procedures for the management of the medicated raw materials and finished products. At a minimum, these procedures shall include: • identification of medication-containing materials handled on site. These can be raw materials, processing aids, intermediate and finished products, rework or any new product or product development ingredients • supplier approval equivalent to section 3.5.1 for all medicated raw materials • specific staff training on the correct handling of medicated materials • mechanisms to ensure the correct concentrations of medicinal substances in finished products • procedures (e.g. cleaning procedures) to prevent contamination of non-medicated pet food or animal feed with materials containing medicinal substances • specific procedures to ensure the correct labelling of medicated pet food or animal feed • waste disposal mechanisms (see section 4.12) that include the safe and legal disposal of medicated raw materials and products |  |  |  |
| **5.8.4** | Site procedures shall be designed and implemented to meet the relevant pet food and animal feed product safety legislation (both in the country of production and in the country of sale). |  |  |  |
| **5.9** | Animal primary conversion |
| Section 5.9 not included in START! Standard, no requirements to compare. |
| Where a site completes animal primary conversion (e.g. for red meat, poultry or fish), the following requirements apply, in addition to those within the rest of the Standard. |
| SOI | For animal primary conversion, the site shall operate controlled processes that ensure products are safe and fit for intended use. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **5.9.1** | The company shall undertake a risk assessment for potential prohibited substances (i.e. those prohibited by legislation in the country of operation or intended country of sale). Example substances include pharmaceuticals, veterinary medicines (e.g. growth hormones), heavy metals and pesticides. The risk assessment may be completed as part of clause 3.5.1.1 or as a separate activity. The results of the risk assessment shall be included in raw material acceptance and testing procedures and in the processes adopted for supplier approval and monitoring (see clauses 3.5.1.2–3.5.2.2). |  |  |  |
| **5.9.2** |  | Where the site is in receipt of live animals, there shall be an inspection by a suitably competent individual at lairage and post-mortem to ensure that the animals are fit for human consumption. |  |  |  |
| **5.9.3** | The site shall operate procedures to ensure that the traceability of all edible parts of the carcass (i.e. all parts that are intended for the human food supply chain) is maintained. |  |  |  |
| **5.9.4** | The site shall establish defined time and temperature requirements for all post-slaughter processes (for example, post-slaughter cooling, processing, storage and distribution). These requirements shall be defined for all chilled or frozen, edible parts of the carcass. |  |  |  |

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| **6** | **Process control** |
| **6.1** | Control of operations |
| **Fundamental SOI** The site shall operate to process specifications and 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **6.1.2** | Where equipment settings are critical to the safety or legality of the product, changes to the equipment settings shall only be completed by trained and authorised staff. Where applicable, controls shall be password-protected or otherwise restricted. |  |  |  |
| **6.1.4** | In circumstances where process parameters or product quality are controlled by in-line monitoring devices, these shall be linked to a suitable failure alert system that is routinely tested. |  |  |  |
| **6.1.7** |  | Where a site handles products or materials (e.g. by-products from production processes) that are outside the scope of the audit, these shall be controlled to ensure that they do not create a product safety, authenticity or legality risk to products within the scope. |  |  |  |
| **6.2** | Labelling and pack control |
| **Fundamental SOI** The management controls of product labelling activities shall ensure that products will be correctly labelled and coded. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **6.2.1** | There shall be a formal process for the allocation of packaging materials to packing lines and control in the packing area which ensures that only the packaging for immediate use is available to the packing machines.Where offline coding or printing of packaging materials occurs:* setting and amendments to the printer parameters (e.g. the input of, or changes to, date codes) shall only be completed by an authorised member of staff
* controls shall be in place to ensure that only correctly printed material is available at the packing machines.

Processes shall be in place to check label use is reconciled with expected use and the cause of any inconsistencies investigated. |  |  |  |
| **6.2.2** |  | Documented checks of the production line shall be carried out before commencing production and following changes of product. These shall ensure that lines have been suitably cleared and are ready for production. Documented checks shall be carried out at product changes to ensure that all products and printed packaging and labels from the previous production have been removed from the line before changing to the next production. |  |  |  |
| **6.2.4** | Where online verification equipment (e.g. bar code scanners) is used to check product labels and printing, the site shall establish and implement procedures for the operation and testing of the equipment to ensure that the system is correctly set up and capable of alerting or rejecting product when packaging information is out of specification.At a minimum, testing of the equipment shall be completed at:* the start of the packing run
* the end of the packing run
* a frequency based on the site’s ability to identify, hold and prevent the release of any implicated materials should the equipment fail (e.g. during the packing run or when changing batches of packaging materials).

The site shall establish and implement procedures in the event of a failure in the online verification equipment (e.g. a documented and trained manual checking procedure). |  |  |  |
| **6.3** | Quantity – weight, volume and number control |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **6.3.2** | Where the quantity of the product is not governed by legislative requirements (e.g. bulk quantity), the product shall conform to customer requirements and records shall be maintained. |  |  |  |
| **6.3.3** | Where used, the site shall establish procedures for the operation and testing of online check weighers. At a minimum, this shall include:* consideration of any legal requirements
* responsibilities for testing the equipment
* operating effectiveness and any variations for particular products
* methods and frequency of testing the check weighers
* processes for handling rejected packs
* records of the test results.
 |  |  |  |
| **6.4** | Calibration and control of measuring and monitoring devices |
| **SOI** | The site shall be able to demonstrate that measuring equipment is sufficiently accurate and reliable to provide confidence in measurement results. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **6.4.1** | The site shall identify and control measuring equipment used to monitor critical control points and product safety, legality and quality. This shall include, at a minimum:* a documented list of equipment and its location
* an identification code and calibration due date
* prevention from adjustment by unauthorised staff
* protection from damage, deterioration or misuse.
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| **6.4.3** | Reference measuring equipment shall be calibrated and traceable to a recognised national or international standard and records maintained. The uncertainty of calibration shall be considered when equipment is used to assess critical limits. |  |  |  |

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| **7** | **Personnel** |
| **7.1** | Training: raw material handling, preparation, processing, packing and storage areas |
| **Fundamental SOI** 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **7.1.3** | The site shall put in place documented programmes covering the training needs of personnel. These shall include, at a minimum:* identifying the necessary competencies for specific roles
* providing training or other action to ensure staff have the necessary competencies
* reviewing the effectiveness of training
* delivery of training in the appropriate language of trainees.
 |  |  |  |
| **7.1.5** |  | All relevant personnel (including relevant agency-supplied staff, temporary staff and contractors) shall have received training on the site’s labelling and packing processes which are designed to ensure the correct labelling and packing of products. |  |  |  |
| **7.2** | Personal hygiene: raw material handling, preparation, processing, packing and storage areas |
| **SOI** | 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 | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **7.2.4** | Where metal detection equipment is used, a sample from each batch of plasters shall be successfully tested through the equipment and records shall be kept. |  |  |  |
| **7.2.5** | Processes and written instructions for staff shall be in place to control the use and storage of personal medicines, so as to minimise the risk of product contamination. |  |  |  |
| **7.4** | Protective clothing: staff or visitors to production areas |
| **SOI** | Suitable site-issued protective clothing shall be worn by staff, contractors or visitors working in or entering production areas. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **7.4.3** | Protective clothing shall be laundered by an approved contracted or in-house laundry using defined criteria to validate the effectiveness of the laundering process. The laundry must operate procedures which ensure:* adequate segregation between dirty and cleaned clothes
* effective cleaning of the protective clothing
* cleaned clothes are supplied protected from contamination until use (e.g. by the use of covers or bags).

Washing of protective clothing by the employee is exceptional but shall be acceptable where:* the protective clothing is not used for product safety purposes; for example, it is used to protect the employee from the products handled

and* the protective clothing is worn in enclosed product or low-risk areas only.
 |  |  |  |
| **7.4.5** | If gloves are used, they shall be replaced regularly. Where appropriate, gloves shall be suitable for food use, of a disposable type, of a distinctive colour (blue where possible) and intact, and shall not shed loose fibres. |  |  |  |
| **7.4.6** | Where items of protective clothing that are not suitable for laundering are provided (such as chain mail, gloves and aprons), these shall be cleaned and disinfected at a frequency based on risk. |  |  |  |

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| **8** | **Production risk zones – high risk, high care and ambient high care** |
| Section 8 only includes SOI in START! Standard, however no requirements to compare. |
| **SOI** | The site shall be able to demonstrate that production facilities and controls are suitable to prevent pathogen contamination of products. |  |
| **8.1** | **Layout, product flow and segregation in high-risk, high-care and ambient high-care zones** |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **8.1.1** |  | The map of the site (see clause 4.3.2) shall include the location of the pathogen control step(s). |  |  |  |
| **8.1.2** | Where high-risk areas are part of the manufacturing site, there shall be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, the nature of the materials (including packaging), the equipment, the personnel, the chemicals, the disposal of waste, the flow of air, the air quality and the provision of utilities (including drains). The location of transfer points shall not compromise the segregation between high-risk areas and other areas of the factory. Practices shall be in place to minimise the risk of product contamination (e.g. the disinfection of materials on entry). |  |  |  |
| **8.1.3** |  | Where high-care areas are part of the manufacturing site, there should be physical segregation between these areas and other parts of the site. Segregation shall take into account the flow of product, the nature of materials (including packaging), the equipment, the personnel, the chemicals, the disposal of waste, the flow of air, the air quality and the provision of utilities (including drains). Where physical barriers are not in place, the site shall have undertaken a documented risk assessment of the potential for cross-contamination, and effective, validated processes shall be in place to protect products from contamination, including the procedures for changeover from low-risk to high-care. |  |  |  |
| **8.1.4** |  | Where ambient high-care areas are required, a documented risk assessment shall be completed to determine the risk of cross-contamination with pathogens. The risk assessment shall take into account the potential sources of microbiological contamination and include: • the raw materials and products • the flow of raw materials, packaging, products, equipment, personnel and waste • air flow and quality • the provision and location of utilities (including drains). Effective processes shall be in place to protect the final product from microbiological contamination. These processes may include segregation, management of process flow or other controls. |  |  |  |
| **8.2** | **Building fabric in high-risk and high-care zones** |
| **8.2.1** | Where sites include high-risk or high-care facilities, there shall be a map of the drains for these areas which shows the direction of flow and the location of any equipment fitted to prevent the backup of waste water. The flow from drains shall not present a risk of contamination to the high-risk/care area. |  |  |  |
| **8.2.2** | High-risk areas shall be supplied with sufficient changes of filtered air. The filter specification used and frequency of air changes shall be documented, based on a risk assessment that takes into account the source of the air and the requirement to maintain a positive air pressure relative to the surrounding areas. |  |  |  |
| **8.2.3** |  | Where sites include removable walls as part of the design of the high-risk or high-care area (e.g. to allow occasional movement of large items or specialist maintenance equipment), procedures shall be in place to ensure: • removable walls are tight fitting • their use is managed • movement of the walls is authorised and is completed only by trained and authorised staff • cleaning and reconditioning procedures are in place and completed prior to production. |  |  |  |
| **8.3** | **Equipment and maintenance in high-risk and high-care zones** |
| **8.3.1** | Maintenance activities undertaken in high-risk and high-care areas shall respect the segregation requirements of the area. Wherever possible, tools and equipment shall be dedicated for use in that area and retained there. |  |  |  |
| **8.3.2** | Where equipment is removed from the high-risk or high-care area, the site shall have a procedure to ensure the cleanliness and removal of contamination hazards before the equipment is accepted back into the area. Records of acceptance back into the area shall be maintained |  |  |  |
| **8.3.3** | Where portable equipment (e.g. handheld devices) and battery-charging equipment is used in high-risk or high-care areas, these items shall either: • be visually distinctive and dedicated for use in that area, or • have specific procedures (e.g. a full clean) to ensure that their use does not result in contamination. |  |  |  |
| **8.4** | **Staff facilities for high-risk and high-care zones** |
| **8.4.1** | Where an operation includes a high-risk or high-care area, personnel shall enter via a specially designated changing facility at the entrance to the area. The changing facilities shall incorporate the following: • clear instructions for the order of changing into and out of dedicated protective clothes to prevent the contamination of clean clothing • protective clothing that is visually distinct from that worn in other areas and which shall not be worn outside the area • a hand-washing routine during the changing procedure to prevent contamination of the clean clothing (i.e. hand-washing after hair covering and footwear have been put on, but before handling clean protective clothing) • hand-washing and disinfection facilities that shall, as a minimum, be situated: • prior to entry for high-risk areas • on entry for high-care areas • dedicated site footwear that is provided by the site and which shall not be worn outside the factory • an effective control of footwear to prevent the introduction of pathogens into the area. Control may be by segregation and a controlled change of footwear before entering the area (such as a barrier or bench system), or by the use of controlled and managed boot-wash facilities where these demonstrably provide an effective control of footwear to prevent the introduction of pathogens into the area. A programme of environmental monitoring shall be used to assess the effectiveness of footwear controls. |  |  |  |
| **8.5** | **Housekeeping and hygiene in high-risk and high-care zones** |
| **8.5.1** |  | Environmental cleaning procedures in high-care/high-risk areas shall consider the different microbiological risks associated with each production risk zone. At a minimum, cleaning procedures in high-risk and high-care areas shall include all of the requirements in clause 4.11.2. The frequency and methods of cleaning shall be based on risk, and the procedures shall be implemented to ensure that appropriate standards of cleaning are achieved. |  |  |  |
| **8.5.2** | Microbiological limits for acceptable and unacceptable cleaning performance shall be defined for high-risk/high-care production risk zones. These limits shall be based on the potential hazards relevant to the product or processing area. Therefore, acceptable levels of cleaning shall be defined, for example, by visual appearance, ATP bioluminescence techniques (see glossary), microbiological testing or chemical testing as appropriate. The site shall define the corrective action to be taken when monitored results are outside of the acceptable limits. Where cleaning and disinfection procedures are part of a defined prerequisite plan to control the risk of a specific hazard, the procedures and frequencies shall be validated and records maintained. This shall include the risk from cleaning chemical residues on food contact surfaces. |  |  |  |
| **8.5.3** | Equipment used for cleaning in high-care and high-risk areas shall be: • visually distinctive and dedicated for use in that area • hygienically designed and fit for purpose • cleaned and stored in a hygienic manner to prevent contamination (for example, storing equipment in designated locations, off the floor, when not in use). |  |  |  |
| **8.5.4** | Where the site uses CIP equipment, either this shall be for a specific area only (i.e. separate equipment for high-risk, high-care and other production areas) or the CIP system shall be designed and controlled so that it does not present a risk of contamination to the high-risk/ high-care area (i.e. controlling direction of flow from high-risk/high-care to low-risk areas, preventing the recycling or re-use of rinse solutions from one area to another). |  |  |  |
| **8.6** | **Waste and waste disposal in high-risk, high-care zones** |
| **8.6.1** |  | Waste disposal systems shall ensure that the risk of contamination of products is minimised through the control of potential cross-contamination. Risk assessment shall consider the movement and flow of waste and waste containers. For example, waste bins should be dedicated to either high-risk or high-care areas and not be moved between different production risk zones. |  |  |  |
| **8.7** | **Protective clothing in high-risk and high-care zones** |
| **8.7.1** | Laundering of protective clothing for high-risk and high-care areas shall be done by an approved contracted or in-house laundry using defined criteria to validate the effectiveness of the laundering process. The laundry must operate procedures which ensure: • adequate segregation between dirty and cleaned clothes • adequate segregation between clothes for high-risk, high-care and low-risk areas etc. • effective cleaning of the protective clothing • commercial sterilisation of the protective clothing following the washing and drying process • protection of the cleaned clothes from contamination until use |  |  |  |
| **8.7.2** | Where protective clothing for high-care or high-risk areas is cleaned by a contracted or inhouse laundry, the laundry shall be audited either directly or by a third party. The frequency of these audits shall be based on risk. |  |  |  |
| **8.7.3** | Protective clothing for use in high-risk and high-care areas shall be changed at an appropriate frequency based on risk, and at a minimum daily. |  |  |  |

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| **Comments** |  |

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| **9** | **Requirements for traded products** |
| Section 9 not included in START! Standard, no requirements to compare. |
| **9.1** | **The food safety plan – HACCP** |
| **SOI** | The site shall operate a HACCP or food safety plan for the processes for which it is responsible. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **9.1.1** | The company shall either: • have a HACCP or food safety plan specifically for the traded products handled on site, or • incorporate the traded products into its existing HACCP or food safety plans (see section 2). The scope of traded products HACCP or food safety plan shall include the products and the processes for which the site is responsible. At a minimum, this shall include goods receipt, storage and dispatch. |  |  |  |
| **9.2** | **Approval and performance monitoring of manufacturers/packers of traded food products** |
| **SOI** | The company shall operate procedures for approval of the last manufacturer or packer of food products which are traded to ensure that traded food products are safe, legal and manufactured in accordance with any defined product specifications. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **9.2.1** | The company shall have a documented supplier approval procedure which identifies the process for initial and ongoing approval of suppliers and the manufacturer/processor of each product traded. The requirements shall be based on the results of a risk assessment which shall include consideration of: • the nature of the product and associated risks • customer-specific requirements • legislative requirements in the country of sale or importation of the product • source or country of origin • potential for adulteration or fraud • potential risks in the supply chain to the point of receipt of the goods by the company • the brand identity of products (i.e. customer own brand or branded product) |  |  |  |
| **9.2.2** | The company shall have a procedure for the initial and ongoing approval of manufacturers of products. This approval procedure shall be based on risk and include either one or a combination of: • a valid certification to the applicable BRCGS Standard or GFSI-benchmarked standard. The scope of the certification shall include the products purchased • supplier audits, with a scope to include product safety, traceability, HACCP review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor. Where this supplier audit is completed by a second or third party, the company shall be able to: • demonstrate the competency of the auditor • confirm that the scope of the audit includes product safety, traceability, HACCP review and good manufacturing practices • obtain and review a copy of the full audit report or • where a valid risk-based justification is provided and the supplier is assessed as low risk only, a completed supplier questionnaire may be used for initial approval. The questionnaire shall have a scope that includes product safety, traceability, HACCP review and good manufacturing practices, and it shall have been reviewed and verified by a demonstrably competent person. |  |  |  |
| **9.2.3** | Records shall be maintained of the manufacturer’s/packer’s approval process, including audit reports or verified certificates confirming the product safety status of the manufacturing/ packing sites supplying the products traded. There shall be a process of review and records of follow-up of any issues identified at the manufacturing/packing sites with the potential to affect food products traded by the company. |  |  |  |
| **9.2.4** | There shall be a process for the ongoing review of manufacturers/packers, based on risk and using defined performance criteria, which may include complaints, results of any product tests, regulatory warnings/alerts, customer rejections or feedback. The process shall be fully implemented. Where approval is based on questionnaires, these shall be reissued at least every 3 years and suppliers shall be required to notify the site of any significant changes in the interim, including any change in certification status. Records of the review shall be kept. |  |  |  |
| **9.3** | **Specifications** |
| **SOI** | Specifications or information to meet legal requirements and assist customers in the safe usage of the product shall be maintained and available to customers. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **9.3.1** | Specifications shall be available for all products. These shall either be in the agreed format as supplied by the customer or, where this is not specified, include key data to meet legal requirements and assist the customer in the safe usage of the product. Specifications may be in the form of a printed or electronic document, or part of an online specification system. |  |  |  |
| **9.3.2** | The company shall seek formal agreement of the specifications with relevant parties. 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. |  |  |  |
| **9.3.3** | Companies shall operate demonstrable processes to ensure that any customer-specified requirements are met. This may be by inclusion of customer requirements within buying specifications, or by undertaking further work on the purchased product to meet the customer’s specification (e.g. sorting or grading of product). |  |  |  |
| **9.3.4** | Specification review shall be sufficiently frequent to ensure that data is current or at a minimum every 3 years, taking into account product changes, suppliers, regulations and other risks. Reviews and changes shall be documented. |  |  |  |
| **9.4** | **Product inspection and laboratory testing** |
| **SOI** | The site shall operate processes to ensure that the products received comply with buying specifications and that the supplied product is in accordance with any customer specification. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **9.4.1** | The site shall have a product sampling or assurance programme to verify that the products are in accordance with buying specifications and meet legal and safety requirements. Where verification is based on sampling, the sample rate and assessment process shall be risk-based. Records of the results of assessments or analysis shall be maintained. |  |  |  |
| **9.4.2** | Where verification of conformity is provided by the supplier (e.g. certificates of conformity or analysis), the level of confidence in the information provided shall be supported by commissioning periodic independent product analysis. |  |  |  |
| **9.4.3** | Where claims are made about the products being handled, including the provenance, chain of custody and assured or ‘identity preserved’ status of a product or raw materials used, supporting information shall be available from the supplier or independently to verify the claim. |  |  |  |
| **9.4.4** | 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 non-accredited test methods are used**.** |  |  |  |
| **9.4.5** | Test and inspection results shall be retained and reviewed to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends. |  |  |  |
| **9.5** | **Product legality** |
| **SOI** | The company shall have processes in place to ensure that the food products traded comply with the legal requirements in the country of sale where known. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **9.5.1** | The company shall have documented processes to verify the legality of products which are traded. These processes shall include as appropriate: • labelling information • compliance with relevant legal compositional requirements • compliance with quantity or volume requirements. Where such responsibilities are undertaken by the customer, this shall be clearly stated in contracts. |  |  |  |
| **9.6** | **Traceability** |
| **SOI** | The company shall be able to trace all product lots back to the last manufacturer and forward to the customer of the company. |  |
| Clause | Food Safety Requirements | Level | START! Requirements | Conforms? |
| **9.6.1** |  | The site’s traceability procedure (see clause 3.9.1) shall include details of the system used for the traceability of traded products. The traceability system shall ensure that, for all batches of product, the site can identify the last manufacturer or, in the case of primary agricultural products, the packer or place of last significant change to the product. Records shall also be maintained to identify the recipient of each batch of product from the company. |  |  |  |
| **9.6.2** | The company shall test the traceability system at least annually to ensure that traceability can be determined back to the last manufacturer and forward to the recipient of the product from the company. This shall include identification of the movement of the product through the chain from the manufacturer to receipt by the company (e.g. each movement and intermediate place of storage). |  |  |  |
| **9.6.3** | The traceability test shall include the reconciliation of quantities of product received by the company for the chosen batch or product lot. Traceability should be achievable within 4 hours (1 day when information is required from external parties). |  |  |  |

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| **Comments** |  |

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