

Information and Certification Requirements

BRCGS



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Revision History

Rev No	Revision Date	Page No	Sec. No	Brief Description of Change
1				Old NCSI Recognition Booklet
2	November 2013			Transfer of NCSI procedure to BSI Procedure
3	September 2014			Changes are highlighted in yellow
4	August 2017			Addition of BRC Agents and Brokers and BRC Packaging Amended Gap to Pre-Assessment audit
5	October 2018			Updated contact details Addition of recall notification
6	June 2020	Various	Various	BRC change to BRCGS Update to Obligations & Complaints Revised Complaints and Appeals Update to Certification Requirements Update to nonconformities
7	February 2024	Various	Various	GFCP change to Gluten Free GFSI version updated to 202
8	November 2024	Full re-structure of the document		

1 Scope

This information requirements document sets out terms which satisfy the related Accreditation and Scheme requirements and forms part of the Service Agreement between client and BSI as indicated in the SRF (Service Request Form) which is completed by your organization when applying for the BRCGS Scheme Certification.

The requirements included in this document does not cover all Scheme rules and therefore the complete Scheme requirements shall be found in the related BRCGS Scheme documents and followed at all times.

For more information about the Scheme please visit the BRCGS Scheme Owner website available here.

2 General Scheme description

The Global Standards for Food Safety, Packaging Materials, Storage and Distribution, Agents and Brokers, Gluten Free and Plant-Based sets out the requirements to support clients, provide assurance to customers that their products are safe, legal and of high quality.

2.1 Related normative requirements

- Global Standard Agents & Brokers 3
- Global Standard Food Safety 9
- Global Standard Gluten-Free 4
- Global Standard Packaging Materials 6
- Global Standard Plant-Based 1
- Global Standard START! 2
- Global Standard Storage & Distribution 4
- Scheme additional document as appropriated for the scope of certification;
- ISO 17065:2012
- IAF Mandatory Documents as applicable and appropriated in accordance with Scheme Rules.
- BSI accreditation scope
- BSI Assurance UK Limited holds a valid global ISO/IEC 17065-1:2012 accreditation. The accreditation body is ANAB and the Scheme Owner is the BRCGS

3 BSI accreditation scope

BSI Assurance UK Limited holds a valid global ISO/IEC 17065-1:2012 accreditation. The accreditation body is ANAB and the Scheme Owner is the BRCGS.

BSI Group is accredited and licensed to offer the BRCGS scopes that can be verified here.

In addition to the accredited BRCGS scope, BSI also offers the following programs unaccredited:

- **BRCGS Gluten Free**
- **BRCGS Plant-based**
- **BRCGS START!**
- **BRCGS Additional modules**

4 BSI scope coverage

BSI scope coverage is as follows:

Global Standards	Accredited	Licensed
Global Standard Food Safety	X	X
Global Standard Packaging Materials	X	X
Global Standard Storage & Distribution	Χ	X
Global Standard Agents & Brokers	Χ	X
Global Standard Gluten-Free	X	X
Global Standard Plant-Based		X
Global Standard START!		X
Additional Modules	Accredited	Licensed
Module 10 – Plastic Pellet Loss Prevention		X
Module 11 – TMS GQS (HAVI)		X
Module 11 – Meat Supply Chain Assurance		X
Module 13 – Meeting FSMA Requirements (Food)		X
Module 06 – Meeting FSMA Requirements (Agents & Brokers)		X
Module 10 – Wholesale Module		X
Module 11 – Cross-Docking		X
Module 12 - E-commerce		X
Module 13 -19 – Contracted Services		X
Additional Requirements	Accredited	Licensed
Additional Costco Requirements		X
AOECS – Remarks for use of the Crossed Grain Trademark		Х

4.1 Global Standard Food Safety

The Standard is applicable to clients who manufacture, processing and packing of processed foods, raw materials or ingredients for use by food service companies, catering companies and/or food manufacturers, primary products such as fruit and vegetables, pet foods for domestic animals and animal feed products from animal primary conversion. Certification applies to products that have been manufactured or prepared at the site where the audit has taken place and includes storage facilities that are under the direct control of the production site management.

4.2 Global Standard Packaging Materials

The Standard is applicable to clients who manufacture of packaging materials that are used in the production of, and filling operations for, food, hygiene-sensitive consumer products (including cosmetics), raw materials, and other consumer products. The requirements are also intended to apply to:

- a. prior operations (e.g. production of packaging materials for conversion or printing),
- operations that are supplying packaging material from stock where additional product processing or repacking occurs,
- c. the manufacture and supply of other materials that are unconverted or semi-converted and used or incorporated (e.g. coatings and adhesives).

4.3 Global Standard Storage& Distribution

The Standard is applicable to clients who provide storage and are in the distribution chain from primary production to retail, subject to the restrictions on the scope of applicable products. For example, this could include distribution from farm to processor, primary processor to manufacturer, manufacturer to off site warehousing, warehousing to retail depots, retail depots to store and store to final consumer (internet shopping).

4.4 Global Standard Agents & Brokers

The standard is applicable to companies in the food, packaging, and consumer products supply chain that buy, sell, or facilitate the trade of products and, may provide additional services such as the purchase, importation or distribution of the products, but do not manufacture or process those products.

4.5 Global Standard Plant-Based

The BRCGS Plant-Based Global Standard applies only to the control of animal inputs in plant-based products, in the manufacture, processing and packaging of the following:

- Processed foods, both own brand and customer branded.
- Ingredients for use by food service companies, catering companies, and food manufacturers
- Pet foods (GFSI benchmarked schemes only)
- Natural health products

Those sites that are not certified in a Global Food Safety Initiative (GFSI) benchmarked scheme must be certified in the BRCGS START! program (intermediate level) or an equivalent global markets program offered by a GFSI benchmarked standard owner. Certification to a GFSI benchmarked scheme or BRCGS START! program may be concurrent with certification to the Plant-Based Global Standard.

4.6 Global Standard Gluten-Free

The Standard is applicable to clients who manufacture, process and pack processed foods (own and customer-branded), ingredients (for use by food service, catering, manufacturing companies), pet foods, cosmetics, natural health products.

The GFCP Global Standard applies to control of gluten in the manufacture, processing, and packing of gluten-free products. It includes processed foods, both own brand and customer branded; ingredients or use by food service companies, catering companies and food manufacturers; pet foods; cosmetics; natural health products and drugs.

The Standard cannot apply to activities relating to wholesale, importation, distribution or storage of food products that are outside the direct control of the company.

4.7 Global Standard START!

Program sets out requirements for the manufacture of processed foods and the preparation of primary products supplies as retailer-branded products, branded food products and food or ingredients for use by food service/catering companies and food manufacturers. It does not apply to food products that do not undergo any process at the audited site or to activities relating to wholesale, importation, distributions or storage outside the direct control of the company.

There are two levels of requirement being:

- Basic: The requirements at the basic level of START! is intended as a minimum to assist sites and their customers to comply with legislative requirements for food safety.
- Intermediate: The requirements at the intermediate level are more detailed, building upon legal compliance, an expansion of the HACCP process and the development of a documented quality management system.

5 Application process

BSI will require completion of an official application form, signed by an authorized representative of the applicant site. It is the responsibility of the applicant site to ensure that adequate and accurate information is shared with BSI about the details of the applicant site.

6 Certification agreement

BSI will have a legally enforceable agreement with your organization for the provision of the BRCGS certification activities in accordance with the relevant requirements.

7 Audit planning

Your site is required to make all necessary arrangements to allow the certification activities to take place in accordance with the Scheme requirements.

7.1 Pre-questionnaire – annual completion

The BSI Pre-Audit Questionnaire needs to be completed for initial clients and confirmed/updated by existing clients annually before each audit takes place. The form should be sent to the local BSI contact at least 15 days prior to the audit date.

8 Certification cycle

The certification cycle starts with the initial certification audit date. Audit frequency is based on grade awarded in each audit. Refer to Appendix in each appropriate standard.

9 Certification and audit process

The BRCGS standards describe how the audit processes operate and explain the rules around the audit and certification to the Standard. This is an essential element of the Standard and should be read and fully understood.

9.1 Initial and continuing certification activity

The objective of the initial certification audit is to confirm:

- That the application and scope of audit is correctly established
- The adoption of the principles and requirements of the BRCGS Global Standard, Senior Management Commitment, a HACCP based system and hazard analysis and establishment of appropriate plans and controls.
- A documented and effective quality and food safety management system is in accordance with the BRCGS Global Standard.
- The effective control of environment standards, products, processes and personnel

This is the first BRCGS audit at a specific site address or audit carried out at a site where the previous certificate has lapsed for more than 24 months.

Continuing certification activity is based on the grade awarded in each audit. Refer to the Appendix for the appropriated standard.

The audit due date shall be calculated from the date of the first day of the initial audit (irrespective of transfer sites / standalone audits / blended audits and whether further site visits were made to verify corrective actions arising from the initial audit) and not from the certificate issue date.

The audit window is stated in each certificate. The audit shall be scheduled within the audit window. The last day of the audit cannot be after the due date.

In some circumstances it is possible to undertake the audit earlier than the due date; for example, to reset the audit dates to allow combined audits with another scheme, or to include a product that is produced during a different season. Where an audit date is brought forward, the following rules shall apply:

- The audit report will detail the reasons why an audit has been brought forward.
- The next audit due date will be 'reset' to the 12 months (or 6 months, depending on grade) from this 'new' audit date.

The certificate (should it be issued) shall have an expiry date of 12 months (or 6 months, depending on grade) plus 42 calendar days from the new audit date.

It is the responsibility of the site to ensure that the audit is undertaken within the audit window. There will be some circumstances where the certificate cannot be renewed on the 6 month or 12 month basis due to the inability of BSI to conduct an audit. These justifiable circumstances, which would not result in the assigning of a major non-conformity, are applicable if/when the site is:

- situated in a specific country or an area within a specific country where there is government advice not to visit and there is no suitable local auditor
- within a statutory exclusion zone that could compromise food safety or animal welfare
- in an area that has suffered a natural or unnatural disaster, rendering the site unable to produce or the auditor unable to visit
- affected by conditions that do not allow access to the site or restrict travel (e.g., heavy snow)
- producing seasonal products where production is delayed by a late start to the season (e.g., due to weather or product availability).

Moving the audit date to a more 'acceptable' later date for reasons of combining audits, lack of personnel or undertaking building work are not acceptable reasons for missing the due date. It is not a justifiable reason to delay audits where sites are not in full production; however, audits must be undertaken while products are being manufactured

9.2 Unannounced program

9.2.1 Announced audit protocol (with 01 unannounced every 3 years)

BSI is responsible for managing the audit process and ensuring that within the 3-year period, all certificated sites receive at least one unannounced audit.

Frequency: Subsequent audits of certificated sites shall be carried out either 6 or 12 months after the previous audit due date, depending on the number and type of non-conformities identified at that audit.

The audit must take place during normal site operation unless other arrangements have been agreed with the site. Important to consider the back out dates.

Note about unannounced: BSI shall notify the site of the year when the unannounced audit will take place, without communicating the actual date of the unannounced audit. This discussion shall occur within 3 months of the previous audit to ensure that the site is aware of the year in which the unannounced audit will take place. The site shall not be notified of the proposed audit date in advance.

9.2.2 Full Unannounced Audit Protocol

All audits (every year) are unannounced in this protocol. The site shall not be notified of the proposed audit date in advance.

The site can choose whether to:

- remain within the unannounced programmes (fully on site)
- revert to the announced audit programme (fully on site or blended).

If the site wishes to remain in an unannounced programme, the next audit will be unannounced. The audit may occur at any stage within the last 4 months of the audit cycle, including the 28 calendar days before the audit due date.

Note - The whole audit window must be used to determine the date (unannounced audits should not be scheduled on the same date for each consecutive year.)

If the site wishes to withdraw from an unannounced audit programme, the next audit will be scheduled to occur within the 28 calendar days up to and including the anniversary of the last audit date; this ensures that the maximum time between audits is not more than a year.

Where the site received a grade of C+ or D+ at the last audit and wishes to withdraw from an unannounced audit programme, the next audit due date will be 6 months after the last audit date, and the audit will occur within the 28 calendar days prior to this date. This applies to a previous certificate that has lapsed for more than 24 months.

10 Non-conformance management

The process for 'closing out' non-conformities depend upon the level of non-conformity and the number of nonconformities identified.

Critical: Where there is a critical failure to comply with a food safety or legal issue. Due to the nature and number of non-conformities, it is unlikely that these non-conformities can be addressed, and fully effective improvements implemented and established, within a 28-calendar-day period, although there may be some exceptions. Therefore, the re-audit shall not take place any earlier than 28 calendar days from the audit date.

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

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

The NCs raised during the audit are documented in the BRCGS NC summary sheet. The NC summary sheet shall be shared with the client at the closing meeting and be signed by both client and auditor.

Following identification of any non-conformities during the audit, the site shall undertake corrective action to remedy the immediate issue, analyse the underlying cause of the non-conformity (root cause), and develop a preventive action plan to address the root cause and prevent recurrence.

The process for 'closing out' non-conformities depends upon the level of non-conformity and the number of nonconformities identified. Nonconformities from the previous certification audit

shall also be checked during the next site audit to verify effective close-out. For each non-conformity at the last audit, the auditor will therefore expect to see the following:

- Corrective actions: The site is required to implement corrective actions and report them to BSI within 28 calendar days of the audit. The auditor shall therefore expect to see the corrective actions from the previous audit in operation (e.g. that the updated procedure submitted to the certification body as evidence of corrective action following the last audit is in use).
- Root cause analysis: After being completed by the site following the last audit, the root cause analysis will have been submitted to BSI, and full details should be available if the auditor requires them.
- **Preventive action:** At the time of the previous certification decision, the site will have submitted a preventive action plan to the certification body but might not have completed the actual preventive action. The auditor will therefore expect to see evidence that the site has been effective in preventing recurrence of the non-conformity.

Where the corrective action or preventive action has been ineffective, a non-conformity shall be raised against the clause indicated below for each Global Standard:

- Global Standard Food Safety: Clause 1.1.12
- Global Standard Packaging Materials: Clause 1.1.9
- Global Standard Storage & Distribution: Clause 1.1.11
- Global Standard Agents & Brokers: Clause 1.1.12

11 Audit reporting requirements

BRCGS has established the audit report template that shall be used for all Global Standards.

Following each audit, a full written report (in English) shall be prepared by the auditor. The audit report shall provide the company and customers or prospective customers with a profile of the company and an accurate summary of the performance of the site against the requirements of the Standard.

The audit report must assist the reader to be informed of the food safety controls in place and improvements since the last audit, 'best practice' systems, procedures, equipment or fabrication in place and non-conformities, the corrective action taken and plans to correct the root cause (preventive actions).

The report shall accurately reflect the findings of the auditor during the audit. Reports shall be prepared and issued so that the certification decision is confirmed within 42 calendar days of the completion of the full audit. Subsequently, the audit report shall be uploaded to and be available from the within 49 days of the BRCGS Directory final day of the audit.

12 Certification decision

BSI is responsible for, and retain authority for, its decisions relating to certification, including the granting, refusing, maintaining of certification, expanding or reducing the scope of certification, renewing, suspending or restoring following suspension, or withdrawing of certification.

13 Certificate and audit report ownership

A (certified) organization is the owner of an audit report (regarding the decision about who the report may be shared with), whilst BSI is responsible for the report data and therefore holds the ownership of the audit report content.

Audit reports shall remain the property of the company commissioning the audit and shall not be released, whole or in part, to a third party unless the company has given prior consent or the release is otherwise required by law.

The owner of the audit report may allocate access to the audit report to customers or other parties in the **BRCGS** Directory.

A (certified) organization is the certificate holder, not the owner. BSI is the data owner of the certificate data.

14 Auditing and certification status information

BSI may have to share the information of your organization relating to the certification and auditing process with the Scheme Owner, the related Accreditation Body, the IAF, GFSI and/or governmental authorities when required. BSI and the Scheme Owner will share the information regarding your certification status with external parties through the related platforms/ database.

15 Other persons attending the audit

It is a condition of undertaking an audit that the auditor may be accompanied by other personnel for training, assessment or calibration purposes. This activity may include:

- training of new auditors by BSI;
- witness audits by Accreditation Bodies, Scheme Owner and/or BSI;
- use of technical expert and/or translator and/or observers.

By accepting the BSI contract your organization agrees to cooperate with such process.

16 Scheme Owner platform/ database management

The Scheme Owner maintains a register of certified sites and its status of certification. This register is publicly available on the Scheme Owner website. The audit documents required by the Scheme Owner will be uploaded to their platform following the Scheme requirements timelines.

17 Scheme Owner audits and communication

The Scheme Owner reserves the right to conduct its own audit or visit to a site once certified in response to complaints and/or as part of the routine Scheme Owner compliance activity to ensure the integrity of the Scheme. Such visits may be announced or unannounced. The certification status may be affected in the event that access to any parts of the site or process or requests is unreasonably refused.

The Scheme Owner may contact the site directly in relation to its certification status or for feedback on BSI performance or investigation into reported issues.

18 Communication obligations

Your organization has the obligation to communicate with BSI within 3 working days the following:

- any significant changes that affect the compliance with the Scheme requirements and obtain advice of BSI in cases where there is doubt over the significance of a change;
- Serious events that impact the certified system, legality and/or the integrity of the certification, including situations that pose a threat to food safety or certification integrity as a result of Force majeure, natural or man-made disasters (e.g., war, strike, terrorism, crime, flood, earthquake, malicious computer hacking, etc.). BSI shall be contacted within 03 working days through critical.food@bsigroup.com.
- Changes to organization name, contact address and site details;
- Changes to organization (e.g., legal, commercial, organizational status or ownership) and management (e.g., key managerial, decisionmaking, or technical staff);
- Major changes to the certified system, scope of operations and product categories covered by the certified scope (e.g. new products, new processing lines, etc.);
- Any other change that renders the information on the certificate inaccurate.
- Any claim or threatened claim against BSI, any member or auditor has performed or is in the course of performing an Audit.
- of any breach of the BRCGS Framework Agreement.
- a certificate of a Supplier is withdrawn, suspended or revoked through BRCGS Directory.
- Serious situations where the integrity of the certification is at risk and/or where the Scheme Owner and/or BSI can be brought into disrepute. These include, but are not limited to:
 - notice and actions imposed by regulatory authorities as a result of a food safety issue(s), where additional monitoring or forced shutdown of production is required;
 - · legal proceedings, prosecutions, malpractice, and negligence; and
 - fraudulent activities and corruption.

- food safety events/product safety incidents (e.g., recalls, withdrawals, calamities, food safety outbreaks etc.).
- In case your organization is affected by a product safety incident, BSI shall be notified within 3 working days through food.recall@ bsigroup.com from the date of the incident. The information related to the product incident will be evaluated and BSI will decide the course of action regarding action needed as well as the status of the certification.

Related definition as follows:

- Product safety incident: Food safety, authenticity or legality incidents, including product recalls, regulatory notice, food safety-related withdrawals or any other incidents affecting the safety of product.
- **Product Recall:** The removal by a supplier of product from the supply chain that has been deemed to be unsafe and has been sold to the end consumer or is with retailers or caterers and is available for sale (Ref: GFSI Benchmarking Requirements _ Version 2020.1).
- Regulatory notice: Any notice (related to the scope of the certification), filing or other documentation required to be submitted to an Applicable Authority with respect to any Regulatory Clearance.
- Product Withdrawal: The removal of product by a supplier from the supply chain that has been deemed to be unsafe, which has not been placed on the market for purchase by the end consumer (Ref: GFSI Benchmarking Requirements _Version 2020.1)
- Notifiable product safety incidents: Any product safety incidents related to a product which is within the scope of the site's certification that shall be communicated to BSI and/or Scheme Owner as described in the following section. It includes cases where the product has already been consumed and therefore the client cannot recall/ withdraw the product.

19 Complaints and appeals

Please refer to BSI website for information related to complaints and appeals, including timeline and communication channel: Complaints and appeals.

20 BSI Impartiality

Impartiality is the governing principle of how BSI provides its services. Impartiality means acting fairly and equitably in its dealings with people and in all business operations. It means decisions are made free from any engagements of influences which could affect the objectivity of decision making.

Find detailed information here.

21 Misleading statement

Your organization is not permitted to use its certification in a manner that could bring BSI or scheme owner into disrepute. This includes making misleading or unauthorized statements.

22 BSI Mark of Trust and **Accreditation Mark rules**

The guideline related to access the marks and the related rules is available here.

23 Scheme Owner Logo rules

Companies that achieve certification and have no exclusions from their scope are qualified to use the BRCGS food logo. (This rule does not apply to the Gluten-Free / Plant-Based/ Storage & Distribution standards)

The logo can be used on site stationery and other marketing materials but shall not be used in promoting products purchased for resale by a site (traded products).

Information and conditions relating to the use of the BRCGS logo is available here.

The BRCGS logo is not a product certification mark and neither it nor any reference certification may be used on products or product packaging. It may not be used by companies that do not include all products that are manufactured, processed, packed or labelled on site within the audit scope.

Any certificated site found to be misusing the logo will be subject to the BRCGS complaints and referral process and may risk suspension or removal of its certification. If a site is no longer certificated because of certificate expiry, withdrawal or suspension, it shall no longer use the logo or certificate claiming certification.

24 Scheme transition information

If a client is transitioning their GFSI certification to BRCGS, then the BRCGS audit must be considered as an initial certification and planned as per the requirements established in this manual in previous sections and the unannounced audit completed for the other GFSI Scheme may be considered.

Contact us bsigroup.com



