BRC GLOBAL STANDARDS

GLOBAL STANDARD

STORAGE AND DISTRIBUTION

ISSUE 3

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ISSUE 3

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HOW THIS PUBLICATION IS ORGANISED

The Global Standard for Storage and Distribution sets out requirements that a site should adhere to in order to be able to consistently store and distribute products to maintain their safety, quality and legality and meet customers' requirements.

It consists of the following parts:

PART I
INTRODUCTION

Provides a background to the Standard and an overview of the scheme. It also defines the scope and the types of products and operations which may be certificated against the Standard.

PART II
REQUIREMENTS

Details the requirements of the Standard with which a company and site must comply in order to gain certification.

PART III
AUDIT PROTOCOL

Provides information on the certification and auditing process, including how to select a certification body, the post-audit requirements, and a description of the BRC Global Standards Directory.

PART IV
MANAGEMENT AND GOVERNANCE

Describes the management and governance systems in place for the Standard and certification body requirements.

APPENDICES

Appendices 1–6 provide additional useful information including details of other BRC Global Standards, competency requirements for auditors, a certificate template, a list of products included within the scope of the Standard, a glossary of terms, and a list of acknowledgements.

PART I
INTRODUCTION

PART I
INTRODUCTION

Welcome to Issue 3 of the Global Standard for Storage and Distribution (henceforward referred to as the Standard).

In 2006 the BRC introduced the Global Standard for Storage and Distribution to complement the suite of Global Standards covering the production of food, packaging and consumer products. This Standard allows the chain of product certification to be completed, from primary processor to manufacturer, and from manufacturer to retailer (or food service company in the case of food).

Issue 3 of this Standard has been developed by a multi-stakeholder group including retailers, food service companies, industry trade associations, independent experts and certification bodies, and builds upon the experience from the previous issue.

In revising the Standard we have attempted to develop the current requirements of the Standard to ensure that they are robust enough to meet the current industry needs. Where applicable, requirements have been aligned with those that feature in the other Global Standards published by the BRC to ensure consistency and confidence throughout the entire supply chain.

This Standard is designed to reflect best practice and facilitate a process of continuous improvement through well-designed risk-based product safety management systems. The objective is to ensure that the quality and safety of products are maintained during their storage and distribution and where subject to other activities such as contracted services, and that customer confidence is upheld through audit and certification.

In many countries the storage and distribution of products, in particular food products, is controlled through legislation. This Standard is based on best practice and is not intended to replace the requirement of any legislation that requires a higher standard for a specific industry sector. In countries where the principles of due diligence apply, certification to the Standard may provide part of a due diligence defence.

Certification to this Standard should give customers confidence in the site; however, the decision to use a particular supplier rests with the individual customer.

WHAT'S NEW FOR ISSUE 3?

The development of Issue 3 followed a wide consultation to understand stakeholders' requirements. A review of emerging issues was also carried out in the logistics industry and the industries it serves. The information has been developed and reviewed by a working group composed of stakeholders representing different sectors of the logistics industry, retailers, brand owners, certification bodies and independent technical experts.

The focus of attention for this issue has been on:

- continuing to ensure consistency of the audit process
- greater consistency with the requirements of the other BRC Global Standards
- vehicle and load security
- more robust requirements for own-label wholesalers to reduce their exposure to fraud
- increased supplier approval requirements
- areas that have traditionally resulted in recalls and withdrawals (e.g. label and packing management).

GRADING SYSTEM

In previous issues of the Standard there was a simple pass/fail criterion as a way of encouraging companies to enter the programme. However, now that the programme is more mature, it is appropriate to introduce a grading system to help companies

demonstrate continual improvement. The grading system is consistent with those found in the Food Safety and Packaging Standards; full details of the system can be found in Part III.

UNANNOUNCED AUDIT PROGRAMME

The number of unannounced audits among specifiers of food manufacturers has increased, and this has been seen to provide a greater confidence in the implementation of a food safety culture. To echo this in the supply chain, the optional unannounced audit programme has been introduced into this Standard. The two options for unannounced audits consist of the choice of either a full unannounced audit or a two-part audit where one element is done unannounced. The unannounced programmes remain voluntary, but they provide added confidence in certification to customers and create marketing benefits where sites achieve the top BRC grade of AA+.

PRINCIPLES OF THE STANDARD

A business must have a full understanding of the products handled, stored and distributed and have systems in place to identify and control hazards significant to the safety, quality and legality of the products. The requirements of the Standard in Part II are divided into eight sections with sections 1 to 3 setting out the key principles of the Standard, and the later sections focusing on the more specific requirements of particular aspects of the operation.

SENIOR MANAGEMENT COMMITMENT

Within storage and distribution businesses, the safety, legality and quality of the products handled must be seen as a cross-functional responsibility, including the activities of many departments using different skills and expertise within the organisation. Effective adoption of the principles of this Standard extends beyond the responsibility of a single individual and must be wholly supported by the full management team.

The starting point for effective implementation of the Standard is the commitment of senior management to the development of an all-encompassing policy to guide the activities which collectively assure that products are stored and distributed in a way that maintains their quality, safety and legality.

A RISK-BASED SYSTEM

The Standard requires an evaluation of the risks to the products during their handling, storage and distribution. The hazard and risk analysis process defined in the Standard should enable potential risks to be identified and controlled either through existing programmes such as pest control (prerequisite programmes) or by the introduction of specific controls. An effective hazard and risk analysis provides the basis for the management system.

QUALITY MANAGEMENT SYSTEM AND SUITABLE OPERATING CONDITIONS

The Standard requires the development of a documented quality management system which will provide the structure to enable the management policies and results of the risk assessment to be implemented consistently, and audited and reviewed to encourage continual improvement.

BENEFITS OF USING THE STANDARD

Adoption, use and certification to the Standard provide a number of benefits in terms of the operation of the business, customers and marketing. These benefits include:

- The Standard is internationally recognised, providing a report and certification that can be accepted by customers in place of their own audits – reducing time and cost.
- The comprehensive scope of the Standard, covering areas of quality, hygiene and product safety, provides a benchmark for best practice in the storage and distribution industries.
- When effectively adopted, the Standard can reduce damage, waste and therefore costs to the business.
- The accredited audit provides greater credibility and recognition when certification is achieved.
- Certificated sites may appear on the BRC public directory allowing recognition of their achievements and the use of a logo for marketing purposes.
- The Standard addresses part of the 'due diligence' requirements of both the certificated company and the customers using its service.
- Ongoing surveillance and follow-up corrective actions after an audit help to ensure that a self-improving quality, hygiene and product safety system is established.

THE CERTIFICATION PROCESS

When a site believes that it meets the requirements specified in the Standard, it may choose to be audited and, if successful, become a 'certificated site'.

The audits and certificates are site-specific, so companies with a number of sites would need separate certification for each site. The Standard is a process and product certification programme in which businesses are certificated upon completion of a satisfactory audit by an auditor employed by an independent third party – the certification body.

In order for a business to receive a valid certificate on completion of a satisfactory audit, the organisation must select a certification body approved by the BRC. The BRC lays down detailed requirements that a certification body must satisfy in order to gain approval as well as specific requirements for auditors with regard to auditing expertise and product sector knowledge.

More information about the certification process and certification bodies is given in Parts III and IV. A list of certification bodies approved by the BRC is available on the BRC Global Standards Directory website: www.brcdirectory.com

THE SCOPE OF THE STANDARD

The Standard has been developed to cover all activities which may affect the safety, quality and legality of the products stored and distributed, and of additional contracted services provided by storage and distribution companies. This Standard does not cover other important requirements applicable to the operation of a storage or distribution business – for example, health and safety, environmental concerns or ethical issues.

SCOPE OF APPLICABLE COMPANY OPERATIONS

The Standard applies to companies providing storage and distribution of products. Where a company also provides one of the specified contracted services at a storage or distribution site this may be included within the audit and certification process. Where a company operates a wholesale business and has storage and distribution facilities under its direct control, the wholesale module may be applied in conjunction with the audit and certification of the storage/distribution operation. Certification to the wholesale and contracted services modules is voluntary but neither module may be certificated alone.

The Standard may be applied both where the company has legal title to the products and where legal title is held by a third party.

The storage and distribution operations to which the Standard may be applied can be at any point in the distribution chain from primary production to retail, subject to the restrictions on the scope of products handled.

The distribution of products may be by road, rail, air freight or ship. It is envisaged, however, that transport other than by road will usually involve the transportation of sealed (and, where necessary, environmentally controlled) containers. The management of the distribution of the containers would be specified in contracts between the owner of the container and shipper. The shipper in such cases would not be included within the scope of this Standard.

The Standard covers distribution at any point in the distribution network for 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
- store to final consumer (internet shopping).

N.B. Courier and postal distribution services are not included within the scope of this Standard.

It is common for companies involved in both storage and distribution to employ some subcontracted hauliers to supplement their own fleet at periods of peak demand. The purpose of the Standard is to provide a certification scheme that ensures the quality and safety of products during their storage and transportation. To be eligible for the scheme, the company must be able to demonstrate that they directly manage and thereby control those aspects of the Standard which are being assessed. The following situations will be acceptable for certification.

Storage
Where the storage facilities are leased or subcontracted from a third party and all of the following apply:

- the labour and quality systems are directly managed by the certificated company
- the company is able to control the condition of the buildings (e.g. ensure upkeep of the fabric)
- the company is able to control building services to ensure that they remain within the requirements of the Standard (e.g. provision of pest control).

Distribution
Eligibility to the scheme is permitted where:

- the vehicles used are leased by the company and the servicing and repairs are under the management control of the company
- the distribution vehicles and labour are provided by a third party under contract but the company can demonstrate that the management of the vehicles and labour is under its direct control. Note that this differs from a subcontracting arrangement where a third party provides the service under contract (e.g. vehicles and labour), but the direct management of the service is controlled by the subcontractor.

Where the eligibility of a company is unclear because of unusual circumstances, this should be checked with the BRC Global Standards team before progressing to audit.

Transport
Certification audits which include distribution within the scope would be expected to include all the applicable distribution requirements listed in the Standard. It is accepted, however, that for some distribution contracts the loading and unloading of vehicles are outside the control of the distribution company. In such circumstances, certificates may be issued with the limited scope wording 'Transport only'.

Exclusions from scope
The Standard is not applicable to:

- storage facilities under the direct control of a production site's management (such facilities may be included within the applicable manufacturing standards – e.g. the Global Standards for Food Safety, Packaging or Consumer Products)
- operations where any form of process is undertaken on open food products (such facilities shall be audited to the Global Standard for Food Safety)
- operations where consumer product items that are not in themselves packaged for consumer sale are assembled to produce the final consumer product (such facilities shall be audited using the Global Standard for Consumer Products).

SCOPE OF APPLICABLE PRODUCTS

The Standard is designed primarily for the storage and distribution of packaged products which are by their nature largely protected from physical contamination. The scope of products covered by this Standard is as follows.

Food
Food products include:

- packaged food products
- bulk storage and transportation (by road only) of food products and ingredients (e.g. flour, oils, sugar syrups, wine)
- loose food products that are limited to:
  - open boxes and trays of fruit and vegetables
  - trays of raw fish/crustaceans/other sea food
  - carcasses of meat.

In all such cases the product shall be received into storage and released into distribution without any further preparation, sorting or processing. Where such additional operations do take place the facility shall be certificated using the BRC Global Standard for Food Safety.

A permitted exception to this rule is where the main activity of the site is storage/distribution and this includes a small amount of order picking from trays of fruit and vegetables to smaller quantities to fulfil customer orders (e.g. for food service customers).

Exclusions
Exclusions from the food products include:

- live animals (except crustaceans prepared for placing on the market for human consumption)
- pre-farm-gate loose bulk agricultural products
- unprocessed bulk agricultural products.

Packaging materials
These include pre-packed and bulk packaging materials for later conversion for food and non-food use.

Where any conversion or other operations which change the nature of the incoming packaging materials are undertaken, the facility shall be audited against the BRC Global Standard for Packaging and Packaging Materials.

Consumer products
These include products covered by the scope of the EU General Product Safety Directive 2001/95 to be sold by retail or similar products supplied to the food service industry.

The Standard applies only to packaged products. 'Packaged' in the context of consumer products is intended to include packaged individual items, bound or shrink-wrapped palletised materials, and items packed in bulk bags as used, for instance, for building materials.

Exclusions
Exclusions from consumer products include:

- fuels sold in bulk or refillable containers
- motor vehicles.

EFFECTIVE DATE OF ISSUE 3

As with all revisions of the Global Standards, there must be recognition that a transition period is in place between publication and full implementation. This allows time for the retraining of all auditors and allows manufacturers to prepare for the new issue of the Standard. Therefore, certification against Issue 3 will commence from 1 February 2017. All certificates issued against audits carried out prior to 1 February 2017 will be against Issue 2 and be valid for the period specified on the certificate.

ACKNOWLEDGEMENTS: A 'THANK YOU' FROM THE BRC

The BRC wishes to acknowledge all those experts who have contributed to the preparation of the Global Standard for Storage and Distribution Issue 3 or provided invaluable feedback through the consultation process. All those who participated in the working groups are listed in Appendix 6.

PART II
REQUIREMENTS

HOW THE REQUIREMENTS ARE SET OUT

EXCLUSION OF REQUIREMENTS

1 SENIOR MANAGEMENT COMMITMENT

2 HAZARD AND RISK ANALYSIS

3 QUALITY MANAGEMENT SYSTEM

PART II
REQUIREMENTS

HOW THE REQUIREMENTS ARE SET OUT

In Part II, each clause of the Standard begins with a statement of intent with which all sites must comply in order to gain certification.

Below this statement of intent the requirements are set out in a tabular format, which specify the criteria against which the audit will be carried out.

The requirements in sections 1–8 shall be applied to **all** operations. Where companies undertake wholesaling or contracted services, the requirements for these activities (sections 9–17) shall be included in addition to the requirements outlined in sections 1–8.

EXCLUSION OF REQUIREMENTS

NON-APPLICABLE CLAUSES

The majority of the requirements of the Standard will apply to both storage and distribution operations and all requirements of the Standard shall be reviewed for applicability, even where the company operates only storage or only distribution.

Distribution companies should be aware that some 'storage' requirements become applicable wherever a distributor temporarily removes product from one vehicle and transfers it to another (e.g. during trans-shipment or consolidation of loads).

Wherever a storage facility subcontracts the distribution of the products, the contract and checks of vehicles may include some or all of the vehicle-specific requirements.

There are, however, some clauses which apply specifically to distribution operations and some which are specific to storage facilities that are not applicable to the site being audited. Where both storage and distribution are not included within the scope of the site's activities, these specific requirements may be excluded and will be marked as not applicable (N/A) in the final audit report. The auditor will assess and decide on the applicability of any clauses which the site believes are not applicable.

It is anticipated that most clauses will be applicable to all operations; however, some clauses may not be applicable, and these are signified by the following codes:

X	not applicable to the products handled (e.g. clauses concerning temperature controls)
XS	not applicable to companies operating only storage
XD	not applicable to companies operating only distribution
XR	not applicable on the basis of risk.

RISK-BASED EXCLUSIONS

The requirements have been written to reflect requirements of the highest product risk categories (e.g. chilled foods) and some may not be appropriate when lower-risk non-food items are stored or distributed. On the basis of risk, some requirements may be excluded; however, in each case a documented risk assessment must be provided for the auditor to evaluate.

The final audit report will include comments on any clauses deemed not applicable or excluded on the basis of risk.

1 SENIOR MANAGEMENT COMMITMENT

1.1 SENIOR MANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT

The company's senior management shall demonstrate that they are fully committed to the implementation of the requirements of the Global Standard for Storage and Distribution. This shall include provision of adequate resources, effective communication, systems of review and actions taken to identify and effect opportunities for improvement.

CLAUSE	REQUIREMENTS
1.1.1	The company's senior management shall develop and document a quality policy statement which states the company's intentions for the safe and legal storage and/or distribution of products and its responsibility to its customers. This statement shall be: • authorised • reviewed • signed and dated by an appropriate senior manager • communicated throughout the company.
1.1.2	The company's senior management shall provide the human and financial resources required to implement the requirements of this Standard and effect improvements identified through management review processes.
1.1.3	The company's senior management shall ensure that objectives are established for the storage and/or distribution of products to maintain product safety, quality and legality in accordance with the quality policy and this Standard. The objectives shall be documented, measurable, monitored, reviewed and clearly communicated to each operating location.
1.1.4	Management review meetings attended by the company's or site's senior management shall be carried out at least annually to ensure that the stated objectives are being met and are appropriate. Management review shall cover all relevant locations, be documented and include an evaluation of: • previous management review minutes, corrective action plans and timeframes • results of internal, customer and independent external audits, customer performance indicators, complaints and feedback • incidents, product rejections/returns, wastage and resultant corrective and preventive action plans • feedback from reviews of the hazard and risk analysis system • resource requirements.
1.1.5	The management review meeting decisions and actions agreed shall be effectively communicated to appropriate staff and the actions implemented within the agreed timescales. Records should be updated to show when actions have been completed.
1.1.6	There shall be clear communication and reporting channels to senior management for staff responsible for monitoring compliance with the Standard. This shall include suggestions for improvement.
1.1.7	The company shall have a current, original hard copy or electronic version of the Standard available and be aware of any changes to the Standard or protocol that are published on the BRC Global Standards website.
1.1.8	The most senior operations manager on site shall attend the opening and closing meetings of the audit for the Global Standard for Storage and Distribution. Where central management systems are operated for multi-site operations, a manager with responsibility for the management system shall be available during audits of hub and satellite operations.
1.1.9 X	Where required by legislation, the company and operating locations shall be registered with (or approved by) the appropriate authority, and evidence of this shall be available.
1.1.10	Where the site is certificated to the Standard, it shall ensure that announced recertification audits occur on or before the audit due date indicated on the certificate.
1.1.11	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.

1.2 ORGANISATIONAL STRUCTURE, RESPONSIBILITY AND MANAGEMENT AUTHORITY

The company shall have an organisational structure that clearly ensures the definition and documentation of the job functions, responsibilities and reporting relationships of staff whose activities affect product safety, legality and quality.

CLAUSE	REQUIREMENTS
1.2.1	The company shall have an up-to-date organisational chart demonstrating the management structure of the company. This shall, where appropriate, include the responsibilities for any associated hub or satellite depots and any responsibilities carried out by a head office.
1.2.2	The senior management of the company shall ensure that all employees are aware of their responsibilities and that mechanisms are in place to monitor the effectiveness of their operation.
1.2.3	The senior management of the company shall ensure that levels of responsibility and accountability are clearly defined for key staff involved with product safety, legality and quality systems. To this end, job descriptions shall be available. There shall be appropriate documented arrangements in place to cover for the absence of key staff.
1.2.4	The senior management of the company shall have a system in place to ensure that it is kept informed of all relevant legislation, product safety issues, scientific and technical developments, and industry codes of practice. There shall be a system in place to ensure that relevant information is passed to the management at other locations, where appropriate.

2 HAZARD AND RISK ANALYSIS

The site's product safety plan shall be based on the principles of hazard and risk analysis, which shall be documented, systematic, comprehensive, fully implemented and maintained. In the food industry these principles are commonly known as HACCP (hazard analysis and critical control points).

CLAUSE	REQUIREMENTS
2.1	Prior to the company conducting a hazard analysis, the company shall ensure prerequisites are in place. Product safety prerequisites or handling requirements shall include, but not be limited to: • condition and maintenance of buildings, equipment and transport vehicles as appropriate • documented practices for the safe handling, storage and transport of products • procedures for handling damages, waste product and returns • pest control procedures • sanitation procedures (cleaning and disinfection) • maintenance of the cold chain (not applicable to ambient stable products) • personal hygiene (limited applicability to pre-packed food products or consumer products) • training.
2.2	The hazard and risk analysis shall be carried out by a multi-disciplinary team including operators and managers who are experienced in the particular activities undertaken by the site. The team members shall have knowledge of the hazard and risk analysis principles.
2.3	The person responsible for leading the hazard analysis shall be able to demonstrate competence in the understanding of HACCP principles and their application. In the event of the company not having appropriate in-house knowledge, external expertise may be sought but the day-to-day management of the system shall remain the responsibility of the company.
2.4 X	Where the hazard and risk analysis study has been undertaken centrally, it shall be possible to demonstrate that the study has been verified to meet the specific activities of the local operation to which the study applies.
2.5	The hazard analysis, and resulting procedures, shall have senior management commitment, and shall be implemented through the site's documented management systems.
2.6	The company shall define the scope of the hazard and risk analysis in terms of the products and processes that are covered. This shall include: • a description of the types of products stored or distributed and any particular specified storage or handling conditions; for example, temperature control, fragility, maximum stacking height, propensity to water damage, conditions of light • the product flow from receipt, storage and dispatch transport to the recipient of the product. This shall include any cross-docking or intermediate storage steps which may be used in the distribution and any back-haul or returns activities.
2.7	The company shall identify and record all potential hazards associated with each step of the product flow as identified in clause 2.6. The company shall include consideration of the following types of hazard: • microbiological growth resulting from temperature abuse of products that require temperature control • physical contamination (e.g. glass contamination from broken lights, wood splinters from pallets, dust, splashing during transfer, pests) • chemical contamination (e.g. product tainting, spillage, cleaning chemicals) • physical damage (e.g. breakage, puncturing of packaging, water damage) • allergenic materials (e.g. cross-contamination of loose product or outer packaging by allergenic products).

CLAUSE	REQUIREMENTS
2.8	The company shall complete a documented analysis of the potential hazards in order to identify which need to be controlled. The following should be considered: • the likely occurrence of the hazard, as established by previous company/industry experience • the severity of the hazard (e.g. injurious to health, potential to cause food-poisoning, rejection or a product recall) • existing prerequisite programmes that effectively prevent or reduce the hazard to acceptable limits.
2.9	For each hazard which requires control, control points shall be reviewed to identify those that are critical. This requires a logical approach and may be facilitated by the use of a decision tree. Critical control points are defined as those control points which are critical to prevent, eliminate or reduce a significant hazard to acceptable limits.
2.10	**Control by prerequisites and documentation** Where the control of hazards is by means of prerequisite programmes, these shall be fully implemented and be demonstrably effective in controlling or reducing the hazard.
2.11 X	**Critical control points** If there are critical control points (CCPs) that are identified where product safety and legality requires control measures to be in place, e.g. storage temperature, then for each CCP it is necessary to: • establish critical limits • establish a system to monitor control of the CCPs • establish the corrective action to be taken when monitoring indicates that a particular CCP is not under control • establish procedures of validation and verification to confirm that the system is working effectively, including auditing of the system • establish documentation concerning all procedures and records appropriate to these principles and their application.
2.12	The hazard and risk analysis shall be reviewed whenever new product types that have different characteristics from the products included within the original study are stored or transported, or where new operations/process steps are introduced.
2.13	The hazard and risk analysis and prerequisite programmes shall also be formally reviewed at least annually and this review documented.

3 QUALITY MANAGEMENT SYSTEM

3.1 GENERAL DOCUMENTATION REQUIREMENTS

3.1.1 QUALITY SYSTEMS

The company shall document procedures to demonstrate compliance with the Standard and shall ensure that all documents necessary to demonstrate the effective operation and control of the processes underpinning this compliance are in place.

3.1.2 DOCUMENTATION CONTROL

The company's senior management shall ensure that all documents, records and data critical to the management of product safety, legality and quality are in place and effectively controlled.

CLAUSE	REQUIREMENTS
3.1.2.1	All documents in use shall be authorised and be the correct version.
3.1.2.2	Documents shall be clearly legible, unambiguous, in appropriate languages and sufficiently detailed to enable their correct application by appropriate personnel. They shall be readily accessible to relevant staff at all times.
3.1.2.3	There shall be a record of the reason for any changes or amendments to documents critical to product safety, legality or quality systems and procedures.
3.1.2.4	Changes to documents shall be effectively notified to document users. A procedure shall be in place to ensure obsolete documentation is rescinded and, if appropriate, replaced with a revised version.

3.1.3 RECORD COMPLETION AND MAINTENANCE

The company shall maintain records to demonstrate the effective control of product safety, legality and quality.

CLAUSE	REQUIREMENTS
3.1.3.1	The records shall be legible and genuine, and retained in good condition for an appropriate defined time period. The record retention time period should reflect product shelf life and any specific customer or legal requirements, but shall never be less than 1 year.
3.1.3.2	The company shall operate procedures for the collation, maintenance, storage and retrieval of all relevant records. Where records are in electronic form, these shall be suitably backed up to prevent loss.

3.2 INTERNAL AUDIT

The company shall audit those systems and procedures that are critical to product safety, legality and quality to ensure they are appropriate and complied with.

CLAUSE	REQUIREMENTS
3.2.1	The audits shall be scheduled, and their scope and frequency shall be established in relation to the risks associated with the activity. The audits shall cover all of the locations included within the scope.
3.2.2	Internal audits shall be carried out by appropriately trained, competent auditors, who shall not audit their own work or where they have direct influence on the operation within the department or section being audited.
3.2.3	Records of internal audits shall be maintained to ensure that conformity as well as non-conformity can be clearly identified and verified.
3.2.4	Results of the internal audit and positive and negative comments shall be brought to the attention of the personnel responsible for the activity audited. Corrective actions and timescales for their implementation shall be agreed.

3.3 CORRECTIVE AND PREVENTIVE ACTION

The company's senior management shall ensure that procedures exist to record, investigate, analyse and correct the cause of failure to meet standards, specifications and procedures which are critical to product safety, legality and quality.

CLAUSE	REQUIREMENTS
3.3.1	An appropriate staff member shall be identified and allocated the responsibility and accountability for each corrective action. This shall be documented.
3.3.2	The company shall ensure that effective actions are taken to correct each non-conformity and shall monitor and record their completion within an appropriate timescale.
3.3.3	Where a non-conformity places the safety, legality or quality of products at risk, this shall be investigated and recorded including: • clear documentation of the non-conformity • assessment of the consequences by a suitably competent and authorised person • the action to be taken to address the immediate issue • an appropriate timescale for correction • the person responsible for correction • verification that the correction has been implemented and is effective • identification of the root cause of the non-conformity and implementation of any necessary actions to prevent recurrence.

3.4 CUSTOMER CONTRACTUAL ARRANGEMENTS

The company's senior management shall ensure that processes are in place to determine their customers' needs and expectations, clearly define their requirements and ensure that these requirements are fulfilled.

CLAUSE	REQUIREMENTS
3.4.1	Customer requirements for the storage and/or distribution of their product shall have been agreed with the customer and documented prior to fulfilment. This shall include any specific handling requirements for the products, e.g. temperature, humidity, light conditions, stack height or compatibility requirements. This may be in the form of a company-issued service specification where no customer-issued specification exists.
3.4.2	The company shall have the ability to meet defined customer requirements without compromising product quality, safety and legality.
3.4.3	Where specified by the customer a review of customer needs and requirements shall be undertaken. Any changes to existing agreements or contracts shall be agreed, documented and communicated to appropriate personnel.
3.4.4	There shall be key performance indicators established relating to customer requirements, performance shall be measured and results communicated to relevant staff.

3.5 PURCHASING

The company shall control all its purchasing processes that are critical to product safety, legality and quality to ensure that services procured conform to defined requirements.

3.5.1 SUPPLIER APPROVAL AND PERFORMANCE MONITORING OF SERVICE PROVIDERS AND EQUIPMENT SUPPLIERS

CLAUSE	REQUIREMENTS
3.5.1.1	There shall be a documented procedure for the approval and monitoring of suppliers of services and equipment. Such services, as appropriate, shall include (but not be limited to): • pest control • laundry services • contracted cleaning (both storage and vehicles) • contracted servicing and maintenance of equipment • equipment providers (e.g. of racking, pallets).
3.5.1.2	Specifications or contracts shall exist between the company and the supplier to define the service provided.
3.5.1.3	The performance of the supplier shall be monitored and action taken where services fail to meet requirements.

3.5.2 MANAGEMENT OF SUBCONTRACTORS

Where activities covered by the scope of this Standard are subcontracted to a third party, e.g. distribution, the subcontractor shall be required to work in accordance with the relevant requirements of this Standard and relevant legislation.

CLAUSE	REQUIREMENTS
3.5.2.1 X	A contract or written agreement shall exist with all subcontractors, which shall, on the basis of risk and any specified customer contracts, define requirements for the safe handling, storage and transport of products, e.g. temperature, special handling requirements, segregation of incompatible products, vehicle type.
3.5.2.2 X	There shall be a documented process for the review and acceptance of a subcontractor who could potentially impact product safety quality and legality. This process shall include a review of the subcontractor's ability to meet the specified requirements for the safe storage or distribution of products. This may include certification against the Standard.
3.5.2.3 X	There shall be a documented review of the performance of all subcontractors and necessary follow-up action to ensure the safety of products where performance is not to specification.
3.5.2.4 X	A register of suitable approved subcontractors shall be maintained, which shall include subcontractors required irregularly, e.g. to meet peak seasonal demand, breakdown cover.

3.6 TRACEABILITY

The site shall have a system of traceability with the ability to trace products through receipt, storage, dispatch and, where applicable, distribution, and vice versa.

CLAUSE	REQUIREMENTS
3.6.1	The site shall have adequate procedures to ensure products and/or pallets are labelled and/or coded to allow product identification and traceability at all times.
3.6.2	Inventory records for vehicles shall enable products to be tracked from loading to delivery and include tracking the movement of trailers/vehicles.
3.6.3	Procedures shall ensure traceability of damaged packs and of products returned to stock or disposal.

CLAUSE	REQUIREMENTS
3.6.4	The system shall be tested at least annually to ensure that traceability can be determined, including consignor details, through the warehouse/store and/or distribution to the final consignee. Full traceability should be achievable in 4 hours.

3.7 MANAGEMENT OF PRODUCT WITHDRAWAL AND PRODUCT RECALL

The company shall have effective documented procedures to facilitate product withdrawals and product recalls.

CLAUSE	REQUIREMENTS
3.7.1	The company shall ensure that systems are in place to formally notify the owner/manufacturer of products where evidence of a product quality or safety issue becomes apparent during the storage or distribution of their product. Documented evidence of the formal notification must be retained.
3.7.2	The procedures relating to product withdrawal and product recall shall be appropriate, formalised and capable of being operated at any time, and will take into account stock requisition, logistics, recovery, storage and disposal (see Requirements, section 3.9 Control of non-conforming product, damages and returns). The procedures shall be regularly reviewed and, if necessary, revised to ensure that they are current.
3.7.3	The product recall and withdrawal procedures shall be tested at least annually to ensure their effective operation. All records supporting the recall data and results of the test shall be retained.

3.8 INCIDENT MANAGEMENT AND BUSINESS CONTINUITY

The company shall have procedures in place to identify and effectively manage incidents including contingency planning to enable business continuity in the case of major incidents which may affect the operation.

CLAUSE	REQUIREMENTS
3.8.1	The company shall provide written guidance to relevant staff regarding the type of event that would constitute an 'incident', and a documented incident-reporting procedure shall be in place.
3.8.2	Procedures shall exist to ensure that product put at risk by an incident is held pending further investigation.
3.8.3	The owner of the product shall be informed where an incident occurs that may put the safety or quality of their product at risk.
3.8.4	The company shall develop contingency planning for business continuity in the event of major incidents such as: • disruption to key services – e.g. water, energy, staff availability • events such as flood, fire and natural disaster • malicious contamination or sabotage.
3.8.5	The procedures shall include as a minimum: • identification of key staff constituting the incident management team and their responsibilities • an up-to-date list of key contacts (including out-of-hours contact details) or reference to the location of such a list (e.g. deputies, emergency services, suppliers, customers, certification body, regulatory authority) • alternative arrangements to fulfil customer expectations • a communication plan, including the provision of information in a timely manner to customers, consumers and, where appropriate, regulatory authorities.

3.9 CONTROL OF NON-CONFORMING PRODUCT, DAMAGES AND RETURNS

The site shall have documented procedures to ensure all non-conforming product is clearly identifiable, effectively quarantined to prevent release and issues investigated.

CLAUSE	REQUIREMENTS
3.9.1	Where products are held pending further investigation, this shall be carried out in such a way as to minimise any further deterioration of these products or contamination of other products.
3.9.2	All non-conforming products shall be handled or disposed of according to the nature of the problem and/or the specific requirements of the owner.
3.9.3	Corrective actions shall be implemented where appropriate to prevent recurrence of non-conformance, and adequate documentation kept of the action taken.
3.9.4	The site shall have a defined policy for customer returns and rejections.
3.9.5 X	Where returns are accepted, procedures shall define, on the basis of risk, the disposition of returned stock – i.e. disposal, return to good stock or collection by the product owner. Records shall be retained.

3.10 COMPLAINTS HANDLING

The company shall have a system for the management of complaints and complaint investigation regarding products and/or services provided.

CLAUSE	REQUIREMENTS
3.10.1	Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively, and records shall be retained.
3.10.2	Complaint data shall, where appropriate, be used to instigate ongoing improvements in order to prevent recurrence.
3.10.3	A system shall be in place to notify the product manufacturer/supplier or owner of complaints about their products where the cause of the complaint does not relate to the activities of the site.

4 SITE AND BUILDING STANDARDS

4.1 LOCATION, PERIMETER AND GROUNDS

The site shall be located and maintained so as to provide protection and prevent hazard to products. Safety, legality and quality of products shall not be compromised.

CLAUSE	REQUIREMENTS
4.1.1 XR	Consideration shall be given to local activities and environment, which may have a potentially adverse impact, and measures shall be taken to prevent product contamination. Where measures have been put into place to protect the site from any potential contaminants, these shall be regularly reviewed to ensure they continue to be effective.
4.1.2	All grounds within the site shall be finished and maintained to an appropriate standard.
4.1.3	A clean and unobstructed area shall be in place along external walls of buildings used for the storage of products.
4.1.4	Sites shall be adequately drained. Where natural drainage is inadequate, additional drainage shall be installed.
4.1.5 X	External storage shall be minimised where undertaken, and items shall be protected from contamination and deterioration.

4.2 SITE SECURITY

The site security shall ensure product safety and integrity.

CLAUSE	REQUIREMENTS
4.2.1	A documented risk assessment shall be undertaken to identify potential risks to the security of product held on the premises in storage or on vehicles, and appropriate controls implemented to reduce the risk. The risk assessment should be reviewed at an appropriate frequency or, as a minimum, annually.
4.2.2 XD	Access to the site by employees, contractors and visitors shall be controlled and a visitor reporting system shall be in place.
4.2.3	The company shall have documented site security procedures. Staff shall be trained in the site security procedures and encouraged to question or report unidentified or unknown visitors.

4.3 LAYOUT, PRODUCT FLOW AND SEGREGATION – PRODUCT INTAKE, HANDLING, STORAGE AND DISPATCH AREAS

The design and layout of the premises shall provide a working environment that prevents the risk of product damage and facilitates product safety, legality and quality.

CLAUSE	REQUIREMENTS
4.3.1 XD	Premises shall allow sufficient working space to enable all operations to be carried out properly under safe hygienic conditions and prevent the risk of product damage.
4.3.2	Adequate segregated storage facilities shall be available to enable incompatible products to be effectively segregated, where required, to minimise the risk of taint or cross-contamination.
4.3.3 XD	The positioning of machinery, equipment, site facilities and services, where provided, shall not jeopardise the integrity of the product, and shall prevent product contamination and damage.
4.3.4 XD	Suitable and sufficient extraction methods shall be provided in areas where fumes may build up (e.g. battery-charging areas). These areas shall also be segregated from product storage areas.
4.3.5	Appropriate storage facilities shall be provided for the control and storage of cleaning and maintenance chemicals, and sited so they shall not compromise the safety, legality and quality of the product.

CLAUSE	REQUIREMENTS
4.3.6 X	Cleaning facilities, e.g. for tray-washing, shall, where appropriate, be adequately segregated from product handling and storage.
4.3.7	Where products are susceptible to weather damage, vehicles shall be loaded and unloaded in covered bays so as to protect the product, or other effective measures shall be put in place.

4.4 FABRICATION – PRODUCT INTAKE, HANDLING, STORAGE AND DISPATCH AREAS

Construction and maintenance of product handling and storage facilities shall be commensurate with the activities being undertaken by the site and shall not have a detrimental effect on product.

CLAUSE	REQUIREMENTS
4.4.1 XD	Walls, floors, ceilings and pipe work shall be maintained in good condition and shall be capable of being kept clean.
4.4.2 XD	Floors shall be designed to meet the demands of the operation and, where appropriate, withstand cleaning materials and methods. They shall be impervious and maintained in good repair.
4.4.3 XD	Where there is a need for drainage, it shall be designed and maintained to minimise risk of product damage or contamination and not compromise product safety, quality and legality.
4.4.4 XD	All water supplies used for cleaning, or in connection with any operation in the storage of products, shall be potable, either being drawn from mains supply or suitably treated according to its source.
4.4.5 XD	Building voids shall be accessible for inspection and, where appropriate, cleaning.
4.4.6 X	Adequate lighting shall be provided for all work areas. Suitable and sufficient lighting shall be provided so as to permit effective inspection of product and effective cleaning.
4.4.7 XD	All bulbs and strip lights that are vulnerable to breakage, including those on electric fly killer units, shall be protected by shatterproof plastic diffusers, sleeve covers or a shatterproof protective coating. Where full protection cannot be provided, the glass-management system shall take this into account.
4.4.8 XD	Where there is a risk of contamination from glass from window breakage, glass windows shall be protected against breakage or the product shall be adequately protected.
4.4.9 XD	Buildings shall be suitably proofed against the entry of all pests. This shall include as appropriate: • the screening of windows that are designed to be open for ventilation • the provision of external doors that are close-fitting or adequately proofed • where external doors to storage areas are kept open, the adoption of suitable precautions to prevent pest ingress • the fitting of screens and traps to drains to prevent pest entry • the protection of canopies from bird roosting and nesting.
4.4.10 XD	The condition of the building fabric shall be monitored through documented audits. Repairs and improvements identified shall be scheduled.

4.5 STAFF FACILITIES

Staff facilities shall be sufficient to accommodate the required number of personnel, designed and operated to minimise the risk of product contamination. Such facilities shall be maintained in good and clean condition and meet any applicable legal requirements.

CLAUSE	REQUIREMENTS
4.5.1	Where open food is stored, toilets shall not open directly into storage areas. All toilets shall be provided with hand-washing facilities comprising: • basins with soap and water at a suitable temperature • adequate hand-drying facilities • hand-wash signs.
4.5.2	Suitable and sufficient hand-cleaning facilities shall be provided and easily accessible to staff and, where applicable, vehicle drivers. Such hand-wash facilities may be located within toilet areas.
4.5.3 X	Where protective clothing is required, designated changing facilities shall be provided for all personnel, whether staff, visitors or contractors, with direct access to handling and storage areas.
4.5.4 XD	Facilities shall be provided for the safe storage of personal items so that such items are not taken into storage areas.
4.5.5 X	The position of catering facilities, where provided, shall not jeopardise the safety, legality and quality of the product.

5 VEHICLE OPERATING STANDARDS

5.1 VEHICLE STANDARDS

All vehicles used for the transportation of product shall be suitable for the purpose, maintained in good repair and in hygienic condition.

CLAUSE	REQUIREMENTS
5.1.1 XS	The load-carrying area shall be free from loose items, damaged panels or projections which could present a risk of damage to products.
5.1.2 XS	The load-carrying area shall be maintained in a suitable condition to prevent the ingress of rain or dampness during transport where the product is vulnerable to weather damage.
5.1.3 XS	The load-carrying area shall be maintained in a condition which facilitates ease of cleaning.
5.1.4 XS	The load-carrying area shall be inspected prior to loading to ensure it is fit for purpose. This shall ensure that it is (as a minimum): • in a clean condition • free from strong odours which may cause taint to products • free from excess humidity which may cause growth of moulds. Records of inspections shall be retained.
5.1.5 XS	Load supports, lashing points, load lock strips and fastenings shall be maintained in good condition and adequate in number to allow loads to be stabilised effectively during transport. Fastenings for curtain-sided vehicles shall be in good condition and secure.
5.1.6 XS	Rear door shutters and tail lifts where fitted shall be in good working order.
5.1.7 X	Where vehicles are equipped with transfer hoses and pumps for the loading or unloading of tankers, these shall be in good condition, hoses capped and securely contained during transport. Any associated product filters shall be maintained in good condition.
5.1.8 X	Where bulk tankers are used for transporting food or other vulnerable products, records of the vehicle load history and cleaning interventions shall be maintained and available to customers as required.

5.2 VEHICLE AND LOAD SECURITY

Procedures shall be in place to ensure product/load is held under secure conditions during transport and, where appropriate, during loading and unloading to prevent theft or malicious contamination.

CLAUSE	REQUIREMENTS
5.2.1 XS	A documented risk assessment shall be undertaken to identify potential risks to the security of the load during transportation, at cross-docking and when using drop-offs. Appropriate controls shall be implemented to reduce the risks. The risk assessment should be reviewed at an appropriate frequency or, as a minimum, annually.
5.2.2 XS	Access to all vehicles shall be restricted to authorised personnel.
5.2.3 XS	Procedures for maintaining the security of the vehicle shall be documented and shall be understood by drivers and delivery staff.
5.2.4 XS	Where vehicle load areas are fully enclosed, doors shall be locked when vehicles have been loaded. Where seals are used, these shall be checked for integrity before unloading.
5.2.5 XS	Where locks or seals are not fitted to vehicles, alternative security arrangements shall be employed, in accordance with risk, together with inspection procedures. The system shall be sufficient to ensure that if access to the load-carrying area of the vehicle has occurred, this would be evident and action taken to ensure the safety of the products.

5.3 VEHICLE MANAGEMENT

The management of vehicles shall be organised to ensure that legal requirements are met and there is minimal risk of disruption to the service provided.

CLAUSE	REQUIREMENTS
5.3.1 XS	Procedures shall be in place to ensure that road vehicles are maintained in a roadworthy condition to reduce the risk of vehicle breakdown and consequent failure to meet customer requirements.
5.3.2 X	Where legally required, vehicle operators shall be registered with the appropriate authority.
5.3.3 XS	Procedures shall be in place in case of vehicle breakdown, accident or incident. The procedures shall ensure that product quality, safety and legality are maintained and should include: • clear instructions and emergency contact numbers for the drivers • instructions on how to preserve any specific temperature or other environmental controls appropriate to the load • checks required to be made on the load before continuing the journey.

5.4 VEHICLE TEMPERATURE CONTROLS

Where environment control of product (e.g. temperature or controlled atmosphere) is critical to product safety, legality and quality, the operating limits shall be clearly specified, adequately controlled, monitored and recorded.

CLAUSE	REQUIREMENTS
5.4.1 X	The company shall operate procedures to verify that the vehicle and equipment employed are capable of consistently maintaining specified product temperature requirements at maximum and minimum loads.
5.4.2 X	Automatic temperature and time-recording equipment shall be used to monitor and record the temperature of the load-carrying area to ensure that the product temperature remains within specification. In the absence of such equipment, manual checks shall be carried out and recorded at an appropriate frequency.
5.4.3 X	Where settings can be adjusted, measures shall be in place to verify temperature settings of vehicles prior to dispatch. Vehicles transporting chilled and frozen products shall be chilled before loading or the required air temperature achieved within a defined time of loading commensurate with maintaining the specified product temperature.
5.4.4 X	Loading and unloading operations shall be undertaken in such a way as to maintain product temperature within the specified limits.
5.4.5 X	A system shall be in place to enable the driver to be made aware if the temperature of the load-holding area varies from the specified limits.
5.4.6 X	In the case of equipment failure, procedures shall be in place to establish the safety and quality status of the product, prior to release to the customer.

6 FACILITY MANAGEMENT

6.1 EQUIPMENT

Equipment shall be suitably designed for the intended purpose and shall be used so as to minimise the risk of damage to, or contamination of, product.

CLAUSE	REQUIREMENTS
6.1.1 XD	Roll cages, pallet lifts and forklift trucks shall be maintained in a good working condition to prevent damage to product.
6.1.2 XD	If racking is present, it shall be adequately maintained, constructed and periodically inspected for damage.
6.1.3 XD	All diesel-powered handling equipment, where used, shall incorporate an appropriate exhaust filter system for the removal of particulates that can pose a contamination risk to product.
6.1.4 XD	Where appropriate, procedures shall be in place to monitor the condition of wooden pallets and plastic trays to prevent the risk of contamination or damage to products.
6.1.5	Knives or other tools provided shall be used in such a way as to prevent damage to products. Snap-off blade knives shall not be used.

6.2 MAINTENANCE

A system of planned maintenance shall be in place covering all items of equipment which are critical to product safety, legality and quality.

CLAUSE	REQUIREMENTS
6.2.1 X	Planned maintenance systems shall be in place for plant and equipment that generates and maintains temperature-controlled areas.
6.2.2	The site shall ensure that the safety, legality or quality of product is not jeopardised during maintenance operations.
6.2.3 X	All third-party contractors and engineers shall be aware of and shall adhere to the site's operating standards. Where appropriate, this shall include the site's hygiene standards and contamination control policies.
6.2.4	Cleaning or replacing light fittings and glass shall be done in a manner such as to minimise the potential for product contamination.
6.2.5	Records shall be kept of vehicle and equipment maintenance.
6.2.6 X	Where open food products are stored, handled or transported, food grade lubricants shall be used.

6.3 CALIBRATION AND CONTROL OF MEASURING AND MONITORING DEVICES

Measuring equipment used to monitor critical control points and product safety and legality shall be identified. The identified measuring equipment shall be calibrated and adjusted or its accuracy verified.

CLAUSE	REQUIREMENTS
6.3.1 X	The company shall calibrate and where necessary adjust the identified measuring and monitoring devices to ensure accuracy within agreed parameters at a predetermined frequency. Where adjustment is not possible, inaccurate equipment shall be replaced.
6.3.2 X	Equipment specified to measure critical control points and legality shall be traceable to a recognised national standard.

CLAUSE	REQUIREMENTS
6.3.3 X	Records of the results of calibration and verification shall be maintained.
6.3.4 X	The measuring and monitoring devices shall be identified and marked in accordance with calibration requirements.
6.3.5 X	The identified measuring and monitoring devices shall be prevented from being adjusted by unauthorised staff.
6.3.6 X	The identified measuring and monitoring devices shall be protected from damage, deterioration or misuse.
6.3.7 X	Procedures shall be in place to record actions taken when the identified measuring and monitoring devices are found not to be operating within specified limits.

6.4 HOUSEKEEPING AND HYGIENE

Housekeeping and cleaning systems shall be in place which ensure that appropriate standards of hygiene are maintained at all times and that risk of contamination is minimised.

CLAUSE	REQUIREMENTS
6.4.1	Documented cleaning schedules shall be in place and implemented for the building, vehicles, plant and all equipment. The frequency and depth of cleaning shall be based on risk.
6.4.2	Cleaning practices shall be completed so as to maintain a suitable environment for the storage and distribution of products. Practices shall minimise risk of contamination to the product.
6.4.3 X	Where clean in place (CIP) systems are in use for cleaning tankers, these shall be designed and operated to ensure effective cleaning, commensurate with the products transported.
6.4.4	Adequate staff, facilities and equipment shall be provided to allow cleaning to be undertaken at a level commensurate with the activities being undertaken by the site.
6.4.5	Records shall be maintained of cleaning undertaken. This shall include any cleaning of vehicles carried out by subcontractors (e.g. tanker cleaning) and, where required by customers, cleaning certificates.
6.4.6	Cleaning chemicals shall be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers' instructions.
6.4.7	Where appropriate, the effectiveness of the cleaning and sanitation procedures shall be verified and recorded.

6.5 WASTE AND WASTE DISPOSAL

There shall be adequate systems for the collection, collation and disposal of waste material.

CLAUSE	REQUIREMENTS
6.5.1	Systems shall be in place to minimise the accumulation of waste in handling and storage areas.
6.5.2 X	External waste collection containers and compactors shall be managed in such a manner as to contain products and not attract pests. Containers holding food products or packaging shall be covered or closed.
6.5.3 X	Products that require specific conditions for disposal shall be separated and disposed of using licensed contractors and in compliance with any legal requirements.
6.5.4 X	In the event that substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be in the business of secure product or waste disposal and shall provide records of material destruction or disposal.

CLAUSE	REQUIREMENTS
6.5.5 X	Surplus customer-branded products shall be disposed of in accordance with customer-specific requirements. Customer brand names shall be removed from packed surplus products before the product enters the supply chain unless otherwise authorised by the customer.
6.5.6 X	Where customer-branded products which do not meet specification 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 are fit for consumption and meet legal requirements.

6.6 PEST CONTROL

The company shall be responsible for minimising the risk of pest infestation on the site.

CLAUSE	REQUIREMENTS
6.6.1	If pest activity is identified it shall not present a risk of contamination to products. The presence of any infestation on site shall be documented in pest control records and be part of an effective pest management programme to eliminate or manage the infestation so that it does not present a risk to products.
6.6.2 XD	The company shall either contract the services of a competent pest control organisation, or shall have trained personnel, for the regular inspection and treatment of premises, in order to deter and eradicate infestation.
6.6.3 XD	Where the services of a pest control contractor are employed, the service contract shall be clearly defined and reflect the activities of the site.
6.6.4 XD	The location of all pest control measures shall be identified on a plan/diagram of the site.
6.6.5 XD	Results of pest control inspections shall, on a regular basis, be assessed and analysed for trends.
6.6.6 XD	Detailed records shall be kept of the pest control inspections, recommendations and necessary actions undertaken.
6.6.7 XD	All products shall be stored so as to minimise the risk of infestation. Where stored-product pests are considered a risk, appropriate measures shall be included in the control programme.
6.6.8 XD	Documentation shall detail the safe use and application of baits and other materials such as insecticide sprays or fumigants.

7 GOOD OPERATING PRACTICES

7.1 RECEIPT OF GOODS

Goods acceptance procedures shall be in place to ensure products are within specification before acceptance.

CLAUSE	REQUIREMENTS
7.1.1 X	Where specific measurable conditions, such as temperature, are critical to the safety, quality or legality of products, processes shall be in place to ensure requirements are fulfilled before acceptance.
7.1.2 XD	There shall be a procedure for inspection of loads on arrival to ensure that products are free from pest infestation, contamination or damage and are in a satisfactory condition.
7.1.3 XD	Procedures shall also be in place to ensure that the loads or products have been held under secure conditions before acceptance.
7.1.4 XD	Where products are marked with a durability code, the residual shelf life shall be checked to ensure this meets any specified customer minimum and assist in stock rotation.

7.2 PRODUCT HANDLING

Product handling and movement shall be carried out to minimise the risk of product damage.

CLAUSE	REQUIREMENTS
7.2.1	Personnel shall be aware of any products requiring specific handling conditions and be trained in appropriate procedures.
7.2.2	The loading of vehicles or shipping containers shall be carried out in a manner which prevents damage, and loads shall be secured to prevent movement during transit.
7.2.3 X	Where products are repacked onto pallets for storage or further distribution, the packing configuration shall prevent the risk of damage (e.g. overhanging cases). Where required, repacked pallets shall be band-wrapped to prevent damage in storage or distribution.
7.2.4 XD	Products shall be stored off the floor either on pallets or racking.

7.3 ENVIRONMENT CONTROL

Where the storage environment (e.g. temperature or controlled atmosphere) is critical to product safety, legality and quality, during handling and storage this shall be adequately controlled, monitored, recorded and verified.

CLAUSE	REQUIREMENTS
7.3.1 X	Monitoring shall be carried out in accordance with product specification requirements and/or specified procedures.
7.3.2 X	In circumstances where temperature control is required, manual or automatic temperature and/or time-recording equipment linked to an automatic alarm system shall be used to monitor temperature.
7.3.3 X	In circumstances where a controlled atmosphere is critical to product safety, quality or legality, manual or automatic gas proportioning and/or time-recording equipment shall be used to monitor, at an appropriate frequency, the gas proportions in the controlled atmosphere.
7.3.4 X	Facilities shall be adequate to maintain products within the temperature range specified for the product specification.
7.3.5 X	Where temperature control is required, product handling and transfer operations shall be undertaken so as to maintain temperature control. Maximum limits on the period of time that particular types of products may remain outside a temperature-controlled environment shall be defined.

CLAUSE	REQUIREMENTS
7.3.6 X	In the case of equipment failure, procedures shall be in place to establish, in conjunction with the product owner, the safety status and effect on the quality of the product prior to release to distribution.
7.3.7 X	Where temperature, humidity or controlled-atmosphere stores are used, the level of uniformity of the environmental condition under control (e.g. temperature distribution) shall be established and where necessary restrictions on product placement be identified.
7.3.8 X	In the event of changes to equipment, the company shall, where appropriate, re-establish the performance capability within the storage area.

7.4 PHYSICAL AND CHEMICAL PRODUCT CONTAMINATION RISK

Appropriate facilities and procedures shall be in place to control the risk of physical or chemical contamination of product including allergens.

CLAUSE	REQUIREMENTS
7.4.1	Detailed written procedures for handling glass and brittle material breakages in the storage, product-handling or load-carrying area of vehicles shall be in place to ensure the necessary precautions are taken.
7.4.2	All spillages or breakages that pose risk of product contamination shall be recorded in an incident report.
7.4.3 X	Where allergenic materials are stored or transported, the potential risk of cross-contamination shall be assessed and any necessary additional spillage controls incorporated. Where allergenic materials are packaged in a format at particular risk of damage (e.g. paper sacks) designated storage areas shall be used to reduce risk of damage and cross-contamination of other products.

7.5 STOCK ROTATION

Procedures shall be in place to ensure products are used in the correct order and within the allocated shelf life.

CLAUSE	REQUIREMENTS
7.5.1	Receipt documents and/or product labelling shall facilitate correct stock rotation.
7.5.2 XD	An effective system shall be in place for identifying the location of stock within the storage area to facilitate stock rotation.
7.5.3 XD	Product shall be handled with due regard to stated shelf life for onward sale, and shall be in compliance with minimum specified shelf life on delivery where this is specified by customers.

7.6 PRODUCT RELEASE

The company shall ensure that product is not released unless all release procedures have been followed.

CLAUSE	REQUIREMENTS
7.6.1 XD	Where products require positive release, procedures shall be in place to ensure that the release does not occur until all release criteria have been met and the release has been authorised. Records shall be retained.
7.6.2 XD	In circumstances where release of product is authorised by the owner of the products or legal clearance (e.g. customs), the management shall have systems in place to ensure that authority for release has been provided prior to dispatch. Evidence of authorisation shall be retained.

8 PERSONNEL

8.1 TRAINING AND COMPETENCY

The company shall ensure that all employees are adequately trained, instructed and supervised to a degree commensurate with their activity and are demonstrably competent to carry out their activity.

CLAUSE	REQUIREMENTS
8.1.1	All personnel, including temporary personnel and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.
8.1.2	The company shall have documented training procedures and documented training records to demonstrate that the training is appropriate and effective.
8.1.3	Where personnel are engaged in activities relating to critical control points (CCPs), they shall receive specific training relevant to the CCPs. Where personnel carry out activities which could affect product safety, legality and quality, the company shall ensure that personnel have been trained in the best-practice operating principles for the particular task.
8.1.4	The company shall routinely review the competencies of staff and provide relevant training as appropriate. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience.

8.2 PERSONAL HYGIENE

The site's personal-hygiene standards shall be documented and adopted by all personnel, including agency staff and visitors to the location, with due regard to risk of product contamination.

CLAUSE	REQUIREMENTS
8.2.1	The site's personal-hygiene standards shall include policy for the following: • the wearing of protective clothing/work-wear • the wearing of jewellery • smoking, eating and drinking • hand-cleaning/personal hygiene • reporting of sickness.
8.2.2	The requirements for personal hygiene shall be communicated to all personnel, agency staff and visitors. Compliance with the requirements shall be checked regularly.
8.2.3	Smoking (where permitted under law), eating and drinking shall only be permitted in designated areas and shall not be permitted in storage and product-handling areas.
8.2.4 XR	Where work-wear is provided, this shall be maintained in a good and clean condition. Additional requirements shall be met where open food is stored, handled or distributed.
8.2.5 X	Protective clothing shall be provided for those employees working with open food. The protective clothing shall be designed and maintained so as not to pose a contamination risk to the product.
8.2.6 X	Protective clothing shall be laundered effectively on a regular basis. A system shall be in place to ensure the effectiveness of the laundering process.
8.2.7 X	Disposable protective clothing, if used, shall be subject to adequate control to avoid product contamination.
8.2.8 X	All hair shall be fully contained to prevent product contamination.
8.2.9 X	All cuts and grazes on exposed skin shall be covered by a contrasting-coloured plaster that is site-issued and monitored.
8.2.10 X	There shall be a procedure for the notification by employees, including temporary employees, of the details of any relevant infectious disease or condition with which they may have come into contact or from which they may be suffering.

WHOLESALE MODULE

For the purpose of the Standard, wholesalers are defined as companies that purchase product (take legal title) for resale to other businesses, i.e. not to the final consumer. The Standard can only be applied to wholesalers that have storage facilities under their direct control where purchased product is received, and which either deliver this product to customer businesses or allow customer businesses to collect.

Where the company applies for certification to the wholesale module, all relevant requirements from the core Global Standard for Storage and Distribution (sections 1 to 8) must also be fulfilled in addition to the applicable requirements outlined in this module.

Wholesaling requirements are divided into two sets:

- Section 9 requirements are applicable to the purchase and wholesaling of branded products.
- Section 10 requirements are applicable to wholesalers who sell products under their own brand name and/or wholesale branded products sold under a brand label exclusive to the wholesaler.

The requirements of sections 9 or 10 or both shall be applied according to the nature of the products stored and distributed by the wholesaler.

9 PURCHASING – BRANDED PRODUCTS

The company shall have systems in place to ensure that products which are purchased for resale are safe, legal and meet customers' expectations of quality.

9.1 SUPPLIER APPROVAL AND PERFORMANCE MONITORING

The wholesaler shall operate procedures for approval and monitoring of its suppliers of purchased product.

CLAUSE	REQUIREMENTS
9.1.1	The company shall have a documented supplier approval procedure which shall be risk-based and clearly define the criteria to be met. The approval process shall consider the type of product and manufacturing facility, where the product was manufactured and potential risks in the supply chain to the point of receipt of the goods by the wholesaler. Supplier approval may be based on: • enforceable warranties from the supplier • historical trading relationship and brand reputation • supplier manufacturing site questionnaire • certification of the manufacturing site, e.g. BRC Global Standards • reliable third-party audit of the manufacturing site • supplier inspection • demonstrable controls in place by a selling agent or broker.
9.1.2	There shall be a defined process for the ongoing assessment of approved suppliers based on risk and performance including complaints. The process shall be fully implemented.
9.1.3	The procedures shall define how exceptions are handled, e.g. the purchase of products where audit or monitoring has not been undertaken.

10 PURCHASING AND MANAGEMENT OF WHOLESALER OWN-LABEL PRODUCTS AND WHOLESALER EXCLUSIVE BRANDS

10.1 SUPPLIER APPROVAL AND PERFORMANCE MONITORING

The wholesaler shall operate procedures for approval and monitoring of the manufacturers and packers of own-label and exclusive brand products.

CLAUSE	REQUIREMENTS
10.1.1	The company shall have a documented supplier approval procedure which identifies the process for the initial and ongoing approval of suppliers and manufacturers/processors of each product traded. The requirements shall be based on the results of a risk assessment that 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.
10.1.2	The approval and monitoring procedure shall be based on risk and include one or a combination of: • certification (e.g. to BRC Global Standards or other GFSI-recognised scheme) • supplier/third-party 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 or, for suppliers assessed as low risk only, supplier questionnaires. Where approval is based on questionnaires, these shall be re-issued at least every 3 years and suppliers will be required to notify the site of any significant changes in the interim. The site shall have an up-to-date list of approved suppliers.
10.1.3	There shall be a documented process for the ongoing assessment of approved suppliers based on risk and performance, including complaints. The process shall be fully implemented.

10.2 PRODUCT AUTHENTICITY

The wholesaler shall ensure that systems are in place to minimise the risk of purchasing fraudulent or adulterated products.

CLAUSE	REQUIREMENTS
10.2.1	A documented vulnerability assessment shall be carried out on all products 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 product through the supply chain • sophistication of routine testing to identify adulterants • nature of the raw materials. The vulnerability assessment shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risk. It shall be formally reviewed on an annual basis.
10.2.2	Where products are identified as being at particular risk of adulteration or substitution, appropriate assurance and/or testing processes shall be in place to reduce the risk.

10.3 PRODUCT DESIGN/DEVELOPMENT

The wholesaler shall ensure that the development and product approval process ensures that products are safe and legal and that a hazard analysis study is undertaken.

CLAUSE	REQUIREMENTS
10.3.1	There shall be a procedure for the assessment and approval of products to be sold as wholesaler own-brand or exclusive brands.
10.3.2	The wholesaler shall, where appropriate, ensure that suppliers undertake factory trials and carry out thorough product conformity checks to verify that product formulation and manufacturing processes are capable of producing a safe and legal product.
10.3.3	The wholesaler shall have a process to ensure that the product label is legal for the known designated country of sale and in accordance with the appropriate product specification.
10.3.4	Wholesalers shall have processes in place to ensure that they are notified of changes in product formulation or process and that any such changes have been adequately assessed for safety and legality.
10.3.5	Product shelf life shall be established, taking into account product formulation, packaging, factory environment and subsequent storage conditions. The shelf life shall be approved by the wholesaler.
10.3.6	The wholesaler shall ensure that shelf life trials are undertaken using documented protocols, and results documented and retained.

10.4 SPECIFICATIONS

The company shall ensure that appropriate specifications exist for all wholesaler own-brand and wholesaler exclusive products.

CLAUSE	REQUIREMENTS
10.4.1	Specifications shall be adequate and accurate, and ensure compliance with relevant safety and legislative requirements. These shall include key data to meet legal requirements and assist the user in the safe usage of the product.
10.4.2	Specifications shall be reviewed whenever products change (e.g. ingredients, processing methods) or at least every 3 years to ensure adequacy and status. The date of review and the approval of any changes shall be recorded.

10.5 TRACEABILITY

The wholesaler shall be able to trace all product lots back to the last manufacturer and forward to the customer of the company.

CLAUSE	REQUIREMENTS
10.5.1	The company shall maintain a traceability system for all batches of product which identifies 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.
10.5.2	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). 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).

10.6 PRODUCT INSPECTION AND ANALYSIS

The wholesaler shall undertake or subcontract product inspection and analyses that are critical to confirm product safety, legality and quality, using appropriate procedures, facilities and standards.

CLAUSE	REQUIREMENTS
10.6.1	Monitoring of incoming products for compliance to specification shall be based on risk assessment. Inspection method, frequency of inspection and procedures shall be specified and documented. Suppliers of incoming materials, as appropriate, shall provide evidence of guarantees, certifications/ declarations of analysis or certificates of conformity.
10.6.2	Where claims are made about products handled or the raw materials used, including the provenance, chain of custody and assured or 'identity preserved' status (see Glossary in Appendix 5), supporting information shall be available from the supplier or independently to verify the claim.
10.6.3	Where the wholesaler undertakes analyses that 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 17025.
10.6.4	Personnel undertaking product testing and analyses shall be suitably qualified and/or trained, and be shall be competent to carry out the analyses required.

10.7 MANAGEMENT OF PRODUCT WITHDRAWAL AND PRODUCT RECALL

The wholesaler shall have a plan and system in place to enable the withdrawal and recall of products should this be required.

CLAUSE	REQUIREMENTS
10.7.1	The company shall have a documented product withdrawal and recall procedure. This shall include, as a minimum: • identification of key personnel constituting the recall management team, with clearly identified responsibilities • guidelines for deciding whether a product needs to be recalled or withdrawn, and the records which need to be maintained • an up-to-date list of key contacts (including out-of-hours contact details) or reference to the location of such a list (e.g. recall management team, emergency services, suppliers, customers, certification body, regulatory authority) • a communication plan, including the provision of information to customers, consumers and regulatory authorities in a timely manner • details of external agencies providing advice and support as necessary (e.g. specialist laboratories, regulatory authorities and legal experts) • a plan to handle the logistics of traceability, recovery or disposal of affected product, and stock reconciliation. The procedure shall be operable at any time.
10.7.2	The product recall and withdrawal procedures shall be tested, at least annually, in a way that ensures their effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test and of any actual recall shall be used to review the procedure and implement improvements as necessary.
10.7.3	In the event of a product recall being initiated by the wholesaler, the certification body that issued the current certificate for the site against this Standard shall be informed within 3 working days of the decision to issue a recall.

CONTRACTED SERVICES MODULE

Storage and distribution operators sometimes provide additional contracted services to their clients as well as the storage and/or distribution of products. The following additional services are voluntary and may be included within the scope of certification:

- product inspection
- contract packing (repacking, assembly packing)
- quantity control inspection
- contract chilling/freezing/tempering/defrost and high-pressure process operations
- contract cleaning of baskets, roll cages and other distribution containers
- waste recovery and recycling.

Where the services directly relate to product, the Standard shall only be applied to pre-packed food products and fully assembled consumer products.

Where such services are provided for open food products, the BRC Global Standard for Food Safety shall be used.

Where services include the assembly of components to make a consumer product, this operation shall be assessed against the BRC Global Standard for Consumer Products.

The contracted services module shall only be certificated in addition to the core Global Standard for Storage and Distribution (sections 1 to 8). To gain certification for the particular scope of contracted services, companies must meet the requirements both of section 11 (Contractual arrangements) and the requirements of the particular service or services to be included within the scope.

11 CONTRACTUAL ARRANGEMENTS (ALL SERVICES)

All contracted services undertaken shall be clearly specified and reviewed prior to acceptance to ensure that requirements can be met, any risks to other products are assessed and any necessary controls implemented.

CLAUSE	REQUIREMENTS
11.1	The company shall enter into formal contractual arrangements with the customer, specifying the requirements of the service undertaken to satisfy their customer's specific needs.
11.2	The company shall review the service specification to ensure that it has the resources and suitable equipment to undertake the service to the specification required.
11.3	The company shall ensure that services are included within the site's hazard and risk assessment (see Requirements, section 2). New products or service components shall be assessed to identify any additional potential risks and appropriate controls.
11.4	The procedures to undertake the service shall be documented and understood by the staff responsible for undertaking the work.
11.5	Staff shall receive training as required to deliver the services to the specification agreed.
11.6	Appropriate recorded checks shall be undertaken to ensure that the contracted service is delivered to the customer-specified limits.

12 PRODUCT INSPECTION

Where a product inspection service is provided to ensure the quality or legality of products, this shall be undertaken using appropriate procedures, facilities and standards.

CLAUSE	REQUIREMENTS
12.1	Where inspection is undertaken on behalf of a customer, the service requirements shall be clearly defined and include: • any specific handling requirements for the materials being inspected, e.g. temperature controls • sort criteria (rejection/acceptance criteria) • sampling rate • reporting protocol • instructions on the action to be taken with defective/rejected product.
12.2	The company shall undertake a contract review before accepting the work to ensure that it has the facilities, resources and competence to undertake the inspection service required.
12.3	The company shall carry out a risk assessment before undertaking work to identify any potential risks to other products handled or stored, e.g. resulting from damage or spillage during inspection. Appropriate controls shall be implemented to prevent, or reduce to acceptable levels, any risk identified.
12.4	Inspection methodology and procedures shall be documented and clearly understood by staff undertaking the work.
12.5	Where equipment is used as part of the inspection process, this shall be calibrated and its operation verified to ensure the effectiveness of the inspection process.
12.6	Records shall be maintained of the inspection activity including: • quantities of rejected product • code information to enable traceability • sampling or test results to establish the efficiency of the sorting process • calibration records for any equipment used in the inspection process.

13 CONTRACT PACKING (REPACKING, ASSEMBLY PACKING)

Where repacking, labelling or other secondary packing operations are undertaken (on packed product), these shall be managed to ensure the safety, quality and legality of the products.

CLAUSE	REQUIREMENTS
13.1	A risk assessment shall be carried out of the proposed packing operation to establish potential risks to product safety and quality and establish suitable controls to mitigate the risk.
13.2	Product and packaging materials shall be stored under conditions to prevent the risk of contamination and deterioration. Any part-used product or packaging materials shall be effectively protected before being returned to storage.
13.3	Where labels/sleeves are applied as part of the process undertaken: • 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 packaging machines • where off-line coding or printing of packaging materials occurs, checks shall be in place so that only correctly printed material is available at the packaging machines.
13.4	Documented checks of the line shall be carried out before commencement of packing and following changes of product. These shall ensure that areas have been suitably cleared and are ready for the next packing run. Documented checks shall be carried out at product changes to ensure that all products and packaging from the previous packing run have been removed from the line before starting the next packing run.
13.5	Documented procedures shall be in place to ensure that products are packed into the correct packaging and correctly labelled. These shall include checks: • at the start of the packing run • during the packing run • when changing batches of packaging materials • at the end of each packing run. The checks shall also include verification of any printing carried out at the packing stage including: • date coding • batch coding • quantity indication • pricing information • bar coding • country of origin.
13.6	Where on-line vision equipment is used to check product labels and printing, procedures shall be in place to ensure that the system is correctly set up and capable of alerting or rejecting product when packaging information is out of specification.
13.7	Records shall be maintained to ensure full traceability of all component parts and of the finished packed product. The system shall be regularly tested to ensure that traceability can be determined.
13.8	Where rework or any reworking operation is performed, this shall be taken into account with respect to the traceability system.
13.9	Where weights of the final packed products are checked, this shall be in accordance with specification and the legal requirements in the country of sale. Records of checks shall be maintained.
13.10	Inventories shall be maintained of components, packed product and waste. The disposal of unused components and waste shall be in accordance with the requirements of the customer.
13.11	Finished product checks shall be carried out in accordance with the customer's requirements and records maintained.
13.12	The organisation shall identify, verify, protect and safeguard customer property provided for use or incorporation into the product. If any customer property is lost, damaged or otherwise found to be unsuitable for use, this shall be reported to the customer and records maintained.

14 QUANTITY CONTROL INSPECTION

Where the company undertakes quantity control, the system shall conform to the customer requirement.

CLAUSE	REQUIREMENTS
14.1	The frequency and methodology of quantity checking shall meet the requirements of legislation governing quantity verification, irrespective of the nature of the pre-pack, e.g. minimum weight, average quantity, average weight, measuring container or quantity.
14.2	If the company undertakes quantity control on imported pre-packed material intended for sale, it shall be able to demonstrate compliance with the legal requirements where the product is available to the ultimate consumer.
14.3	Where the quantity of the product is not governed by legislative requirements (e.g. bulk quantity), the product must conform to customer specification requirements.
14.4	All equipment used for quantity measurement shall be legally acceptable and regularly calibrated.
14.5	Underweight/volume or rejected products shall be disposed of in accordance with the customer's requirements.
14.6	Records shall be maintained of the quantity checks and shall be in a format which is legally acceptable in the country where the products will be sold.

15 CONTRACT CHILLING/FREEZING/TEMPERING/DEFROST AND HIGH-PRESSURE PROCESS OPERATIONS

Where the site undertakes contract chilling/freezing/tempering defrost or high pressure process operations on pre-packaged product, it shall undertake such operations in accordance with specifications provided by the owner of the product, and ensure that the processes are monitored and that product safety, legality and quality characteristics are not compromised.

CLAUSE	REQUIREMENTS
15.1	The site shall operate procedures to verify that the processes and equipment employed are capable of meeting the specified requirements of the customer.
15.2	Process validation shall be undertaken in accordance with the requirements of the owner of the product.
15.3	The process shall be monitored by the use of real-time temperature-recording equipment linked to an automatic failure alarm system or, where appropriate, manual checks at a suitable frequency.
15.4	In the case of equipment failure or process deviation, procedures shall be in place immediately to advise the owner of the product and to take any action as required by the owner of the product.

16 CONTRACT CLEANING OF BASKETS, ROLL CAGES AND OTHER DISTRIBUTION CONTAINERS

Where the site undertakes contracted cleaning of equipment, this shall be carried out effectively and without risk to other products stored or distributed.

CLAUSE	REQUIREMENTS
16.1	The cleaning area shall be suitably segregated from product storage and handling areas to prevent any risk of contamination of products.
16.2	The layout of the cleaning area shall ensure the segregation of clean from unclean items.
16.3	Drainage facilities shall be adequate to prevent accumulation of water.
16.4	Ventilation shall be adequate to prevent any risk of condensation forming in product storage areas.
16.5	Equipment used for cleaning shall be well maintained and serviced at a frequency to ensure optimum performance.
16.6	Where automatic equipment is used, specified limits shall be established for optimum operating performance, e.g. detergent dosing levels, wash/rinse/drying temperatures, operating speed and performance monitored to ensure these are achieved.
16.7	The site shall operate procedures to verify that the processes and equipment employed are capable of meeting the specified requirements of the customer.

17 WASTE RECOVERY AND RECYCLING

Where the site undertakes to back-haul waste materials/packaging for recycling or disposal on behalf of a customer, this shall be carried out in a safe hygienic manner in accordance with legal requirements.

CLAUSE	REQUIREMENTS
17.1	The company shall clearly specify the types of materials that will be handled and any exceptions. This information shall be available to the driver.
17.2	The layout of the receiving area for waste materials shall ensure adequate segregation from product receipt, handling and storage areas.
17.3	Where company-owned or contracted vehicles are used for the collection of waste materials from the customer: • there shall be adequate segregation from products being transported to prevent contamination of product and its packaging • vehicles shall be suitably cleaned before re-use for transporting products.
17.4	The handling of materials received for waste/recycling shall be carried out in a manner which prevents the risk of contamination of products.
17.5	Waste/recycled materials shall be stored in a manner which does not attract or present harbourage for pests.
17.6	Where specifications exist from the customer for the waste materials, e.g. levels of purity for materials for recycling, there shall be processes in place to ensure these are achieved.
17.7	Where the ultimate disposal of materials is governed by legal requirements, these shall be understood and the site and waste contractors licensed as appropriate.

PART III
AUDIT PROTOCOL

INTRODUCTION

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AUDIT PROTOCOL

INTRODUCTION

This audit protocol provides the specific requirements for auditing and certification to the Global Standard for Storage and Distribution. It shall be used by the certification bodies undertaking certification and provides the basis for accreditation bodies when carrying out their own audit and surveillance work of certification bodies seeking accreditation to operate the Standard. The protocol also provides guidance for companies seeking certification on the audit and certification process to help prepare and organise for the audit.

Every effort has been made to ensure that the content of the requirements and the audit protocol are accurate at the time of issue. However, the audit protocol may be subject to minor change, and reference should be made to the BRC Global Standards website (**www.brcglobalstandards.com**) for changes to the protocol. The website will also provide any further interpretations or updates of the Standard should this become necessary during the life of this issue.

Most companies using the Standard wish to be independently assessed to demonstrate that they meet the requirements of the Standard and obtain certification to the BRC Global Standard scheme. This assessment takes the form of an audit visit which is carried out by an independent certification body registered with the BRC. The BRC does not carry out audits directly itself. Certification will be granted following a successful site audit and the completion of action to address non-conformities to the satisfaction of the certification body.

The process by which a site gains and maintains certification is summarised in Figure 1, and details of the key process steps for the three audit options are provided in sections 2, 3 and 4.

To gain and maintain certification to the BRC Global Standard for Storage and Distribution, the company must be committed to ensuring and maintaining compliance with the requirements of the Standard at all times. **It is the responsibility of the site to maintain certification**; the certification body may assume responsibility for maintaining the ongoing audit programme.

Learn	• Visit www.brcglobalstandards.com • Review any appropriate guidelines
Audit preparation	• Select an audit option (announced, unannounced) • Self-assessment of compliance with the Standard • Selection of a certification body • Define scope of the audit
Audit planning	• Ensure information and appropriate personnel are available for the audit even in the event of an unannounced audit • Provide information to certification body for audit preparation • Define audit date and agree duration
On-site audit	• Opening meeting • Inspection of site/storage facility (where applicable) • Document review • Traceability exercise and check of associated records and documentation • Vehicle audit (where applicable) • Final review of findings by auditor • Closing meeting – review audit findings and confirm any non-conformities Note that there is no requirement for the auditor to carry out the audit in the order listed above.
Non-conformities and corrective action	• Corrective action provided for any non-conformities identified within 28 days or revisit depending on number and nature • Certification body reviews evidence in 14 days • If corrective action deemed satisfactory, certificate, audit report and corresponding grade issued
Post audit	• Ongoing maintenance of the Standard and continual improvement • Get login details for the BRC Global Standards Directory and share audit report with any required customers • Use of BRC logos • Ongoing communication with certification body • Schedule re-audit date before re-audit due date

FIGURE 1 HOW TO GAIN CERTIFICATION

1 GENERAL PROTOCOL – AUDIT PREPARATION

1.1 SELECTION OF AN AUDIT OPTION

There are a number of options and processes available for sites to demonstrate their commitment to the Global Standard for Storage and Distribution.

1.1.1 Announced audit programme

This is available for existing certificated sites and those new to certification. The audit date is agreed with the certification body in advance of the audit and all requirements of the Standard are audited within the audit visit.

Successful sites are awarded a certificate with the grade of AA, A, B, C or D depending on the number and type of non-conformities identified.

More details on the announced audit programme can be found below in section 2.

1.1.2 Unannounced audit programme

The unannounced audit options are available for existing certificated sites. The unannounced audit options provide sites with the opportunity to demonstrate the maturity of their quality systems and successful sites are awarded grades of AA+, A+, B+, C+ or D+ depending upon the type and number of non-conformities identified at the audit.

The conducting of an independent, unannounced review of the production facilities, systems and procedures under this scheme provides a site's customers with added confidence in the site's ability to consistently maintain standards. This may influence the frequency of customer audits, where conducted, and other performance measures applied by the customer.

There are two options for unannounced audits, which allow companies to decide the one best suited to their business requirements; the grading and reporting for each is the same. For option 1, the whole Standard is audited on a single unannounced audit visit, typically lasting 1.5–2 days.

For option 2, the audit visit is split into two separate visits, each typically lasting 1–2 days. The first visit, which is unannounced, audits predominantly site and vehicle operating standards. The second part of the audit, which is planned, looks predominantly at the documented systems and records. This approach allows companies to ensure that appropriate managers are available to assist with the audit of documentation.

The unannounced audit process for options 1 and 2 is summarised in Figure 2. More details on the unannounced audit programme can be found below in sections 3 and 4.

1.2 SELF-ASSESSMENT AND PREPARATION

It is essential that the site is assessed against the current issue of the Standard; this can be checked on the BRC Global Standards website (**www.brcglobalstandards.com**).

The Standard should be read and understood and a preliminary self-assessment should be conducted by the company against the Standard to prepare for the audit. Any areas of non-conformity should be addressed by the site.

Further information, guidance and training to ensure compliance with the Standard, including a downloadable self-assessment tool, is available at **www.brcglobalstandards.com**. The BRC Global Standards also has a full range of further guidelines and supporting materials available through the BRC website and via the BRC Participate subscription service.

An optional on-site pre-assessment may be carried out by the selected certification body in preparation for the audit to provide guidance to the site on the process of certification. It should be noted, however, that under the rules for accredited certification, consultancy cannot be provided during any pre-assessment offered by the certification body that will later undertake the certification audit.

Units that are newly built or commissioned must ensure that systems and procedures in place are compliant before an initial BRC audit is undertaken. It is at the discretion of the company when they wish to invite a certification body to carry out an audit; however, it is unlikely that full compliance can be satisfactorily demonstrated at an audit undertaken less than 3 months from commencement of operation. This is likely to be the situation even where the site for certification uses quality systems developed by other certificated companies in the group.

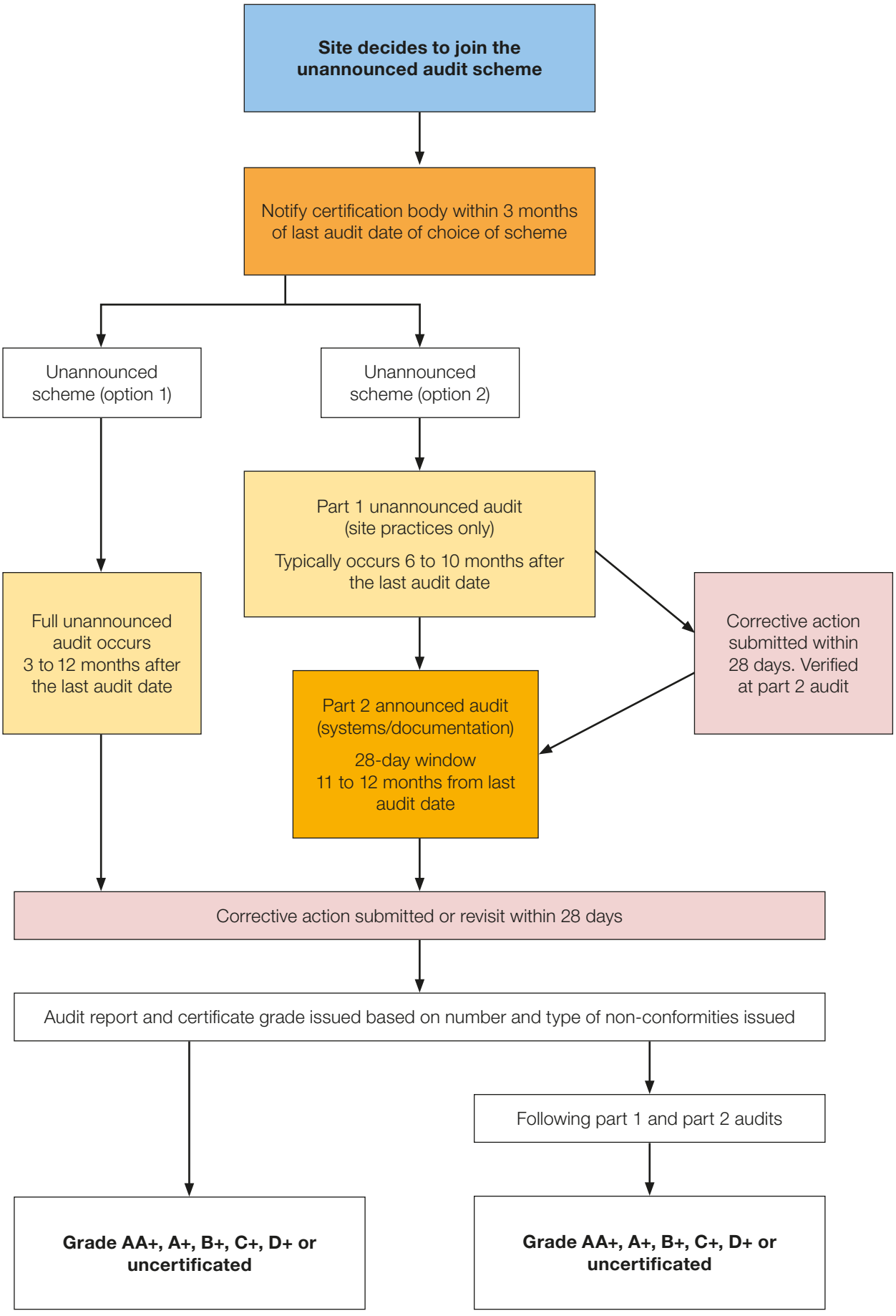

FIGURE 2 THE UNANNOUNCED AUDIT PROCESS

1.3 SELECTION OF A CERTIFICATION BODY

Audits against the BRC Global Standards are only recognised if these are undertaken by certification bodies that are recognised and approved by the BRC. The BRC cannot advise on the selection of a specific certification body; however, the BRC has a comprehensive programme of measurement of certification body performance around specified key performance indicators (KPIs), the results of which are converted to a 5-star rating and published with the listing of all BRC-approved certification bodies on **www.brcdirectory.com**.

1.3.1 Company/certification body contractual arrangements

A contract shall exist between the company and the certification body in accordance with the requirements of ISO/IEC 17065, detailing the scope of the audit and the reporting requirements. The contract shall also contain clauses which allow the effective management of the scheme by the BRC and accreditation of the certification body by their accreditation body. These are essential to ensure confidence in the way in which the scheme is managed and consistency achieved, which benefits all certificated sites. In particular it is a condition of certification to the scheme that:

- A copy of the audit report and any subsequent certificate or audit result shall be supplied to the BRC and may be supplied to the accreditation body in the agreed format for the BRC Global Standard used. Other documents in relation to the audit shall be made available to the BRC upon request. All documents submitted to the BRC shall be copies of original documents. Documents provided to the BRC will be treated as confidential.

- The auditor(s) may be accompanied by other personnel for training, assessment or calibration purposes. This activity may include:
  - training of new auditors by the certification body
  - routine certification body shadow audit programmes
  - witness audits by accreditation bodies
  - witness audits by the BRC.

The BRC Global Standards team reserves the right to conduct its own audit or visit to a site once certificated in response to complaints or as part of the routine BRC Global Standards compliance activity to ensure the integrity of the scheme. Such visits may be announced or unannounced.

The BRC Global Standards team may contact the site directly in relation to its certification status or for feedback on certification body performance, or investigation into reported issues.

This publication sets out the requirements for sites that want to apply to be audited against the Standard and for sites issued with a certificate. Contracts between the certification body and the site shall include a clause acknowledging these obligations. This contract will be formulated by the certification body.

Non-compliance with any of these contractual obligations may affect the status of certification of the site.

1.3.2 Registration fee

The BRC will require a registration fee to be collected by the certification body from the company for every audit undertaken. The certificate and audit report shall not be valid until the registration fee and the certification body's audit fees have been received, irrespective of the outcome of the certification process.

1.4 SCOPE OF AUDIT

The types of products and activities which can be certificated to the Standard are defined in Part II. It is, however, essential that the site clearly defines the scope of its operation with the certification body to assist audit planning and to ensure the appropriate BRC Global Standard is used.

1.4.1 Defining the audit scope

The scope of the audit must be agreed between the company and the certification body before scheduling the audit.

In order to define the activities to be audited and define the scope for certification, the certification body will need to clearly understand the company to be audited and activities undertaken. This may be carried out via questionnaire, discussion or pre-audit meeting with the company's management. This planning process shall include establishing a full understanding of the company's activities including, where applicable:

- the operational management structure of the company – i.e. where more than one facility is involved, the role of head office or regionalised systems in meeting requirements of the Standard
- the location of the company's sites and, where the company operates from more than one location, the inter-relationships between different locations and the site(s) to be audited
- any subcontracting arrangements, e.g. for distribution vehicles
- any limitations on distribution activities imposed by customers, e.g. where loading or unloading is not carried out by the distribution company
- any cross-docking or product transfer activities undertaken during distribution
- the nature of any additional contracted services to be included within the scope
- the range of products handled and any particular special handling requirements
- any activities which occur only for limited periods each day, e.g. order picking and loading.

The scope of the audit and subsequent certificate shall generally cover all the activities and product categories permitted within the scope of the Standard. By exception, certain activities or products may be excluded from the scope where this is agreed before the audit. Any exclusions that apply shall be clearly stated on the report and certificate.

1.4.2 Exclusions from scope

The fulfilment of the certification criteria relies on clear commitment from the site management to adopt the best practice principles outlined within the Standard and to the development of a product safety culture within the business. It follows therefore that the exclusion of product categories from the scope of certification shall only be permitted by exception.

The exclusion of product categories handled at a site will only be acceptable where:

- the excluded product categories can be clearly differentiated from the product categories within scope **and**
- the product categories are stored in a physically segregated area of the factory.

Where exclusions are requested these shall be agreed with the certification body in advance of the audit and considered in the certification body contract review process. Exclusions shall be clearly stated on the audit report and certificate and the justification recorded on the audit report.

The certification of products must include audit of the entire process (e.g. from goods intake to delivery to customer). It is not possible to exclude parts of the process undertaken. Where exclusions are accepted, the auditor(s) shall assess any hazards presented by excluded areas or product categories (e.g. the introduction of allergens or foreign-body risks) and non-conformities may be raised relating to the excluded area where this poses a risk to the product categories within the audit scope.

Where a company operates wholesale activities or contracted services, these may be excluded as they are voluntary elements of the Standard.

1.4.3 Specifying the scope on audit reports/certificates

The agreed scope of the certification shall be clearly defined in both the audit report and any subsequent certificate issued. The scope description shall include three components:

- the product categories handled (e.g. chilled food, frozen food, ambient food, packaging materials, textiles, electrical products etc.)
- the service activities included (i.e. storage, distribution, transport only, wholesale, identified contracted services)
- exclusions from scope (i.e. any products handled or activities undertaken at the site but not included in the audit scope). Where there are no exclusions the report/certificate shall say 'none'.

Distribution can only be included within the scope if some or all of the distribution vehicles are directly managed by the site. It is accepted that often sites will use subcontractors to supplement their own fleet, particularly at times of peak demand. The subcontracting arrangements will be assessed against clauses in Part II, section 3.5.2.

Where the loading and/or unloading of vehicles is carried out by the customer and not by the distribution company, these activities will be outside the scope of the audit. In such circumstances the scope shall include the wording 'transport only' instead of 'distribution' and the exclusions from scope shall include the loading/unloading of vehicles.

1.4.4 Exclusion of requirements

The requirements of the Standard would be expected to be met in full for a typical storage and distribution operation handling food products. It is possible that where some lower-risk consumer products are handled, some requirements of the Standard may be excluded on the basis of risk. Where requirements are to be excluded, the site shall provide a documented risk assessment justifying the exclusion. The risk assessment shall be assessed by the auditor and any accepted exclusions itemised on the audit report.

Where companies operate only storage facilities and the distribution is managed by a third party not under the company's direct control, then many of the vehicle requirements in Part II, section 5 (Vehicle operating standards) would not apply. If, however, the site subcontracts the distribution, then the requirements of section 5 should be included within the subcontracted arrangements with each distribution company.

Where companies operate only distribution activities, some elements of Part II, section 4 (Site and building standards) may not apply.

The auditor shall assess whether a clause is applicable and will indicate this in the report.

1.5 AUDITOR SELECTION

It is the responsibility of the site to ensure that adequate and accurate information is given to the certification body, detailing the products handled, to enable the certification body to select an appropriate audit team with the required skills to undertake the audit. Auditors must be skilled to audit in the relevant product category, as listed in Appendix 2.

The certification body, auditors and the site must be aware of the need to avoid conflict of interest when arranging for an auditor(s) to visit the site. The site may decline the services of a particular auditor offered by the certification body. The same auditor is not permitted to undertake audits on more than three consecutive occasions at the same site.

Where the audit is not being carried out by the auditor(s) in the native language of the site, an appropriate translator shall be provided having knowledge of the technical terms used during the audit.

2 ANNOUNCED AUDIT PROTOCOL

2.1 AUDIT PLANNING

2.1.1 Preparation for an audit visit

For the initial BRC audit, the site shall choose a certification body and select and agree a mutually convenient date, with due consideration given to the amount of work required to meet the Standard. For subsequent audits, the mutually agreed date must allow sufficient time to ensure the site does not go outside the certification timeframe.

Before any audit, the site is required to review the Standard and make any necessary amendments or improvements to its own operations and systems. The site may also be required to provide the certification body with background information through the completion of either a pre-audit questionnaire or a pro-forma information sheet. The site should provide the certification body with any information that would assist the auditor in preparing an effective audit, such as hazard and risk analysis documentation, details of its organisational structure and site plan, and any relevant performance data.

The site is required to make the previous audit report available to the auditor and the certification body.

There is a requirement to plan carefully for the audit, to have appropriate documentation for the auditor to assess, and to have appropriate staff available at all times during the audit. The site shall ensure that where key activities occur only at particular times of day, the certification body is made aware of this to enable it to plan the audit activity accordingly.

The site shall ensure that the activities undertaken at the time of the audit represent activities included within the scope. Where possible, the widest range of these activities shall be in operation for the auditor to assess. Where the range of activities is large or diverse, the auditor has the discretion to continue the audit until sufficiently satisfied that the intended scope of the certification has been assessed.

2.1.2 Information to be provided to the certification body for audit preparation

The site shall supply the certification body with background information prior to the audit day to ensure the auditor(s) is fully prepared and to provide the best opportunity for the audit to be completed efficiently. The information will be requested by the certification body and may include but is not limited to:

- the process flow diagram
- a simple site plan
- the management organisational chart
- the list of product categories handled and/or service activities included within the audit scope
- typical shift patterns
- work schedules, to allow audits to cover relevant processes (e.g. night-time operation or dispatches that are not carried out each day)
- number of vehicles in operation and when vehicles will be on site
- recent quality issues, withdrawals or customer complaints and other relevant performance data.

The company shall make the previous year's audit report and certificate available to the certification body, where this is a contract with a new certification body.

2.2 HEAD OFFICE AND MULTI-SITE OPERATIONS

A storage or distribution operator may have the added complexity of multiple locations, with the head office managing some audit requirements.

In order to complete the audit process and be in a position to issue a certificate, the auditor shall assess all applicable requirements of the Standard. This may necessitate separate audit visits to a head office and the site to be certificated to complete the audit, or it may be possible to access documentation held at head office from the site.

Where a company has several storage/distribution sites seeking certification, all of which are operating to a centralised system managed at a head office, it is normal for a separate audit of the head office function to be undertaken. Figure 3 provides an example of an audit process flow for a head office with multiple storage/distribution sites.

In such circumstances the certification body will develop a full audit plan that includes the activities of the head office and all its participating sites. The initial audit shall be of the head office, and any non-conformities identified shall be corrected to the satisfaction of the certification body before undertaking the site audits. Any uncorrected non-conformities shall be carried over and included in subsequent site audit reports.

The site audit reports shall provide a complete commentary on how the requirements of the Standard are met, including those activities audited at the head office.

The head office of the company shall be visited annually. Re-audits of individual sites under the head office's control are performed at a frequency dependent on the previous audit performance of that particular site.

Certificates cannot be issued for head office operations. Separate reports and, where appropriate, individual certificates shall be issued for each site.

2.2.1 Defining the limits of a site

Audit reports and certificates must be site-specific. In practice, however, a company may own several storage facilities/ warehouses at different locations all operated under common management as a single operation.

For the purposes of this Standard the separate buildings may be classed as a single 'site' where all of the following criteria are satisfied:

- all locations are managed by the same management team
- all locations operate to the same site quality management system
- all locations are within 50 km of the location of the site management team.

All locations classified as part of a single site shall be audited at each audit. The addresses of all locations shall be included on the certificate or on an addendum to this and shall be identified in the audit report.

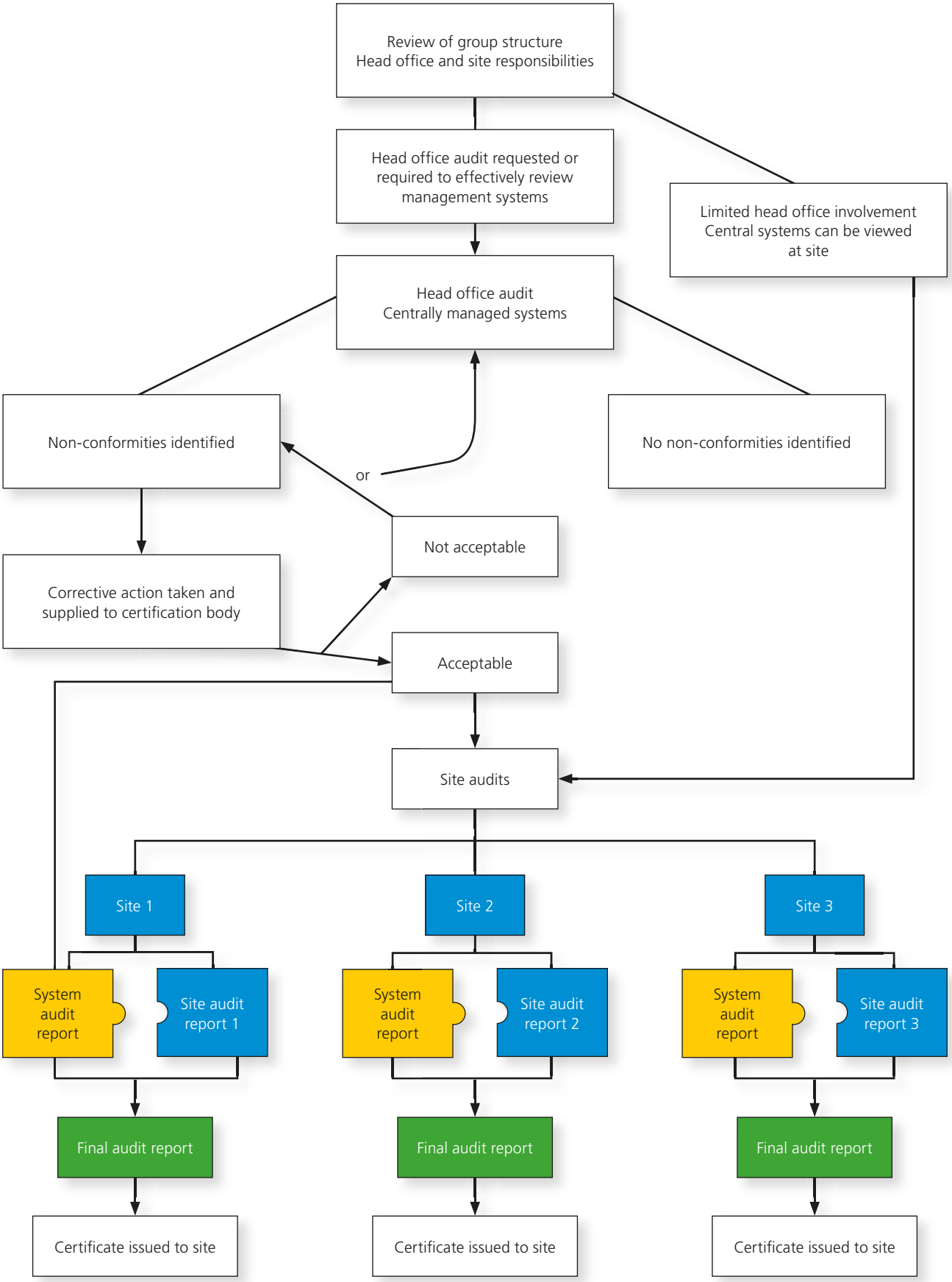

FIGURE 3 AUDIT PROCESS FLOW FOR A HEAD OFFICE WITH MULTIPLE SITES

Where cross-docking/trans-shipment activities are included, the location for this activity must meet the requirements defined in the site standards and be included in the audit programme.

2.2.2 Hub and satellite depots

It is recognised that some distribution operations operate with a hub depot supplying product to one or more smaller regional satellite depots for storage and local distribution. Satellite depots may be included within the certification process of the hub depot where all of the following criteria are satisfied:

- products are received into the satellite depot only from the hub
- management systems for the satellite depot are the same as at the hub
- management responsibility for the satellite depot rests with a manager of the hub depot.

Where these circumstances are met, the satellite depot shall receive an audit visit but as part of the hub depot audit and may therefore be included within the report and certificate of the hub depot.

Where these circumstances are not met, the satellite shall receive its own full audit and receive a separate audit report and certificate, where applicable. Satellite depots may also choose to be audited and certificated as separate sites.

2.3 DURATION OF AUDIT VISIT

The duration of an audit visit for a single location undertaking storage and distribution shall typically be 1.5 working days (8 hours/day), with a further half-day for the completion of the audit report.

Although it is recognised that the duration of an audit is typically 1.5 working days, certain factors may necessitate an increase or decrease in the duration of the audit. These factors will require careful consideration, both upon confirmation of the expected duration of the audit and during the audit itself.

In some cases, certification bodies may request documentation for review prior to the audit visit. The time required to assess this documentation is in addition to the duration of the audit visit.

Factors that may lengthen the duration of the audit include:

- more than one location, with separate office and storage sites
- any need to witness the unloading of vehicles or to accompany drivers
- the use of contracted services
- a large, widely dispersed site
- high numbers of site staff
- the first visit by the auditor to the site
- the audit not being carried out in the first language of the auditor
- a high number of non-conformities recorded at the previous audit
- difficulties experienced during the audit that require further investigation
- an ill-prepared site or poorly coordinated documentation.

Factors that may reduce the duration of the audit are:

- the exclusion of distribution from the scope of a storage site
- sites applying only for distribution
- limited product and process diversity
- low numbers of staff
- a modern purpose-built site
- quality management systems managed centrally and separately audited
- a well-structured and established hazard and risk management system
- a well-structured and established quality management system
- a well-briefed site prepared to provide the evidence required (procedures, records and other documentation).

The audit covers both systems and their implementation. A significant proportion of the audit (typically no less than 3 hours) will be spent in and around the storage area reviewing operations, inspecting vehicles and interviewing staff.

Where distribution is included within the scope, the certification body must be satisfied that adequate evidence is available to confirm that the activities undertaken during the transportation of products – e.g. security of loads, control of temperature (where appropriate) – are being met. If the requirements cannot be satisfactorily verified without the need to accompany a vehicle, then an accompanied vehicle inspection shall be required as part of the assessment programme.

Before the audit visit takes place, the certification body shall indicate the approximate duration of the audit. Confirmation of the duration of the audit shall be made by an appropriately authorised employee of the certification body, with reference to the factors specified above.

Deviation from the expected audit timeframe must be justified and specified on the audit report.

2.4 THE ON-SITE AUDIT

The factors specified within this section of the audit protocol will determine the length of time required to carry out a full site audit.

The on-site audit consists of the following stages:

- opening meeting – to confirm the scope and process of the audit
- document review – of the documented hazard and risk analysis, and quality management systems
- inspection of site or storage facility (where applicable) – to review practical implementation of the systems, and interview of personnel
- vehicle audit (where applicable) of a sample number of vehicles – to review practical implementation of the systems, and interview of personnel
- traceability exercise and check of associated records and documentation – this is a vertical audit, as specified within the BRC guidance document on auditing techniques
- final review of findings – conducted by the auditor in preparation for the closing meeting
- the closing meeting – to review audit findings with the site. (Note that non-conformities are subject to subsequent independent verification by the certification body management.)

The auditor shall allocate sufficient time to ensure that appropriate attention is given to the document review and the site and vehicle inspection. The site and vehicle inspection process shall typically take a minimum of 3 hours to complete.

The site will fully assist the auditor at all times.

It is expected that at the opening and closing meetings, those attending on behalf of the site will be senior managers who have the appropriate authority to ensure that corrective action can be progressed in the event of non-conformities being found.

During the audit, detailed notes shall be made regarding how the site conforms to the Standard and any non-conformity identified. These notes will be used as the basis for the audit report. The auditor will assess the nature and significance of any non-conformity and shall discuss this with the accompanying manager at the time. At the closing meeting, the auditor shall present their findings and discuss all non-conformities that have been identified during the audit. The site shall receive clear instructions on the type of evidence that will need to be provided to demonstrate the correction of any non-conformities and the timescale for the presentation of the evidence. The auditor is not permitted to provide specific advice on the corrective action to be taken as this constitutes consultancy work. A written summary of the non-conformities discussed at the closing meeting shall be provided either at the closing meeting or within 1 working day of completion of the audit.

At the closing meeting the auditor(s) shall provide the site with an explanation of the BRC Global Standards Directory, which allows secure access to audit data to both the client and their nominated customers, together with the feedback systems available to communicate with the certification body and with the BRC Global Standards team.

The decision to award certification and the grade of the certificate will be determined independently by the certification body management, following a technical review of the audit report and the closing of non-conformities in the appropriate timeframe. The company will be informed of the certification decision following this review.

2.5 NON-CONFORMITIES AND CORRECTIVE ACTION

2.5.1 Non-conformities

The level of non-conformity assigned by an auditor against a requirement of the Standard is an objective judgement with respect to severity and risk and is based on evidence collected and observations made during the audit. The level assigned is verified by the certification body management.

There are three levels of non-conformity:

- **Critical** Where there is a critical failure to comply with a product safety or legal compliance issue
- **Major** Where there is a substantial failure to meet the requirements of a statement of intent or any clause of the Standard, or where a situation is identified which would, on the basis of available objective evidence, raise significant doubt as to the conformity of the product or services 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.

As the objective of the audit is to provide a true reflection of the standard of the operation and level of conformity against this Standard, consideration should therefore be given to awarding a single major non-conformity where minor non-conformities are repeatedly raised against a particular clause of the Standard. Clustering of a significant number of minor non-conformities against a clause and recording this as a single minor non-conformity is not permitted. The certification body shall justify a high number (more than 20) of minor non-conformities where no more than one major non-conformity is given. This shall be detailed on the audit report.

2.5.2 Procedures for handling non-conformities and corrective action

Following identification of any non-conformities during the audit, the site must undertake corrective action to remedy the immediate issue (correction) and to undertake an analysis of the underlying cause of the non-conformity (root cause). A preventive action plan should be developed to address the root cause and prevent recurrence.

All identified non-conformities must be corrected to the satisfaction of the certification body before a certificate can be issued. In circumstances where it is not possible to effect a permanent solution within the timescale for certification, a temporary solution may be accepted by the certification body.

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

Critical non-conformities or a combination of non-conformities resulting in non-certification

In some circumstances the number or severity of non-conformities raised at the audit prevents the site from being certificated following that audit. This will be the case where:

- a critical non-conformity is raised
- a major non-conformity against the statement of intent of a fundamental clause is raised
- the number or type of non-conformities exceeds the limits for certification, as per Table 1.

The grading of non-conformities will be reviewed by the independent certification process of the certification body as soon as possible after the audit. Where the review confirms that a certificate cannot be awarded, the site will be required to undertake another full audit before assessment for certification.

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-day period – although there may be some exceptions. Therefore, the re-audit shall not take place any earlier than 28 days from the audit date.

Where this occurs at a certificated site, certification must be immediately withdrawn.

It is a requirement of some customers that they shall be informed when their suppliers have a critical non-conformity identified or fail to gain certification. In such circumstances the company shall immediately inform its customers and make them fully aware of the circumstances. Information on the corrective actions to be taken in order to address the non-conformities will also be provided to customers where required.

Major and minor non-conformities
No certificate shall be issued until it can be demonstrated that major and minor non-conformities have been corrected, either permanently or via a temporary solution that is acceptable to the certification body.

For each non-conformity raised, the site shall, in addition to undertaking the necessary immediate corrective action, undertake a review of the underlying cause (root cause) of the non-conformity. The root cause shall be identified and an action plan to correct this, including timescale, shall be provided to the certification body. The proposed preventive action shall be included in the audit report.

Close-out of non-conformities can be achieved either by objective evidence being submitted to the certification body, such as updated procedures, records, photographs or invoices for work undertaken, or by the certification body undertaking a further on-site visit.

If satisfactory evidence is not provided within the 28 calendar-day period allowed for submission following the audit, certification will not be granted. The site will then require a further full audit in order to be considered for certification.

Non-conformities from the audit shall also be checked during the next site audit to verify effective close-out of the non-conformities and their root causes. Where the correction has been ineffective then a non-conformity shall be raised against clause 1.1.11 in Requirements.

The certification body will review objective evidence of the corrective action completed prior to awarding a certificate.

2.6 GRADING OF THE AUDIT

Table 1 specifies the grades, the levels of non-conformity and the audit frequency that may result from an audit. Certification and grading are awarded according to the following circumstances:

- **For initial audits** Satisfactory corrective action shall be taken and this shall be reviewed and a decision taken on its acceptability within 90 calendar days of the audit date in order for a certificate to be issued. If this timescale cannot be met, a full re-audit will be required before a certificate may be issued.
- **For certificated sites** Satisfactory corrective action shall be taken and this shall be reviewed and a decision taken on its acceptability within 28 calendar days of the audit date in order for a certificate to be issued. If this timescale cannot be met, a full re-audit will be required before a certificate may be issued.

2.6.1 Revisits

Where a revisit is required to review the action taken in response to the non-conformities identified at the audit, this will be scheduled to be completed within the timescales for certification – i.e. 28 calendar days for certificated sites, and 90 calendar days for initial audits. The visit will primarily review the effectiveness of the corrective actions taken; however, if new non-conformities are identified during the course of the visit, these must also be satisfactorily resolved before a certificate can be issued. The action taken to correct the non-conformity will be recorded on the final audit report.

2.6.2 Documentary evidence

Where a revisit is not required, suitable documentary evidence (e.g. updated procedures, records, photographs, invoices for work completed) shall be provided to the certification body within the timescales for certification – i.e. 28 calendar days for certificated sites, and 90 calendar days for initial audits. The evidence provided should clearly demonstrate that adequate corrective actions have been taken and implemented. If this cannot be effectively demonstrated to the satisfaction of the certification body, then a revisit may be required before a certificate can be issued.

TABLE 1 AUDIT GRADES, NON-CONFORMITIES AND CORRECTIVE ACTIONS REQUIRED

GRADE ANNOUNCED	GRADE UNANNOUNCED	CRITICAL	MAJOR	MINOR	CORRECTIVE ACTION	AUDIT FREQUENCY
AA	AA+			5 or fewer	Objective evidence within 28 calendar days (90 days for initial audits)	12 months (18 months for existing certificated sites handling consumer products only)
A	A+			6 to 10	Objective evidence within 28 calendar days (90 days for initial audits)	12 months (18 months for existing certificated sites handling consumer products only)
B	B+			11–16	Objective evidence within 28 calendar days (90 days for initial audits)	12 months (18 months for existing certificated sites handling consumer products only)
B	B+		1	10 or fewer	Objective evidence within 28 calendar days (90 days for initial audits)	12 months (18 months for existing certificated sites handling consumer products only)
C	C+			17 to 24	Objective evidence within 28 calendar days (90 days for initial audits)	6 months (12 months for existing certificated sites handling consumer products only)
C	C+		1	11 to 16	Objective evidence within 28 calendar days (90 days for initial audits)	6 months (12 months for existing certificated sites handling consumer products only)
C	C+		2	10 or fewer	Objective evidence within 28 calendar days (90 days for initial audits)	6 months (12 months for existing certificated sites handling consumer products only)
D	D+			25 to 30	Revisit required within 28 calendar days	6 months (12 months for existing certificated sites handling consumer products only)
D	D+		1	17 to 24	Revisit required within 28 calendar days	6 months (12 months for existing certificated sites handling consumer products only)
D	D+		2	11 to 16	Revisit required within 28 calendar days	6 months (12 months for existing certificated sites handling consumer products only)
Not certificated		1 or more			Certificate not granted. Re-audit required	
Not certificated				31 or more	Certificate not granted. Re-audit required	
Not certificated			1	25 or more	Certificate not granted. Re-audit required	
Not certificated			2	17 or more	Certificate not granted. Re-audit required	
Not certificated			3 or more		Certificate not granted. Re-audit required	

Note that shaded cells indicate zero non-conformities.

2.7 AUDIT REPORTING

Following each audit, a full written report shall be prepared in the agreed format (see the BRC website, **www.brcglobalstandards.com**).

The audit report shall include the following sections:

- audit details
- audit summary
- non-conformity and corrective action summary
- explanation of clauses assessed as non-applicable
- checklist of compliance with each clause.

The audit details, non-conformity and corrective action summaries shall be written in English to enable this information to be uploaded to the BRC Directory. This information may also be presented in another language where requested.

The audit summary section shall be in open-text format, in English (or in the language specified by the user) and shall provide a comprehensive summary of how the site complies with the requirements of each section of the Standard.

The certification body shall retain records showing how sites have complied with each clause of the Standard; while this information does not have to be reproduced in full in the final report, it shall be retained and made available on request.

Reports shall be prepared and dispatched to the site and a copy uploaded onto the BRC Directory within a period typically no longer than 42 calendar days after the audit date (104 calendar days for initial audits).

Audit reports shall remain the property of the company commissioning the audit and shall not be released, in whole or part, to a third party unless that company has given prior consent (unless otherwise required by law). Consent may be given either by a consent form, by authorising access directly on the BRC Directory, or it may be contained within a contract between the site and user or the site and the certification body.

The certification body will retain a copy of the audit report. The audit report and associated documentation shall be stored safely and securely for a period of 5 years by the certification body.

2.8 CERTIFICATION

After a successful outcome of the audit process, a certificate shall be issued by the certification body. Certificates shall be prepared and dispatched to the site typically within 42 calendar days of the audit date (104 calendar days for initial certification).

The certificate shall conform to the format shown in Appendix 3. BRC and accreditation body logos shall comply with the rules for their use.

The certificate shall include, as a minimum, the following information:

- certification body name and address (and accreditation body registration number)
- name, address and BRC registration number of the site audited and certificated
- certification standard, i.e. BRC Global Standard for Storage and Distribution Issue 3
- scope of certification activities – storage, distribution (or transport only), wholesaling, contracted services (followed by the services, e.g. waste recovery and recycling etc.)
- the audit option chosen (i.e. announced) or whether the certificate is a re-issue for an extension to scope
- product categories – range of actual products covered (e.g. ambient foods, electrical products etc.)
- specific exclusions from scope – either stated as 'none' or, where activities are undertaken or products are handled on site that have been excluded, a description of the activities or actual products excluded
- date of audit
- certificate issue date
- re-audit due date
- certificate expiry date
- authorising signature.

All dates specified on the certificate shall be the format of day, month, year – e.g. 11 November 2017.

In some instances a company may own several storage facilities at different addresses within a town, or a sub-depot may have been included within the audit programme for the main depot (see Audit Protocol, section 2.2). In the event that one or more premises are audited as one site, the report and the certificate shall clearly indicate the locations which have been audited and are included, and any locations not audited and excluded.

The users of certificates should validate their authenticity on the BRC Directory website (**www.brcdirectory.com**) and ensure that the scope and the information on the certificate are clearly stated and assessed against their own requirements.

The certificate is issued to the site; however, it remains the property of the certification body and is subject to control regarding its use and display.

2.9 ONGOING AUDIT FREQUENCY AND CERTIFICATION

2.9.1 Scheduling re-audit due dates

The first re-audit after initial certification shall always take place within 12 months of the initial audit date (even for a site handling consumer products where the audit result would normally have justified a recertification audit within 18 months).

Subsequent audits of certificated sites shall be carried out either 6, 12 or 18 months after the previous audit due date according to the number and type of non-conformities identified at the previous audit (see Table 1).

The due date of the subsequent audit shall be calculated from the initial audit, irrespective of whether further site visits were made to verify corrective actions arising from the previous audit, and not from the certificate issue date.

The subsequent audit shall be scheduled to occur within a 28-calendar-day time period up to the next audit due date. This allows sufficient time for corrective action to take place in the event of any non-conformities being raised, without jeopardising continued certification.

Table 2 provides worked examples in accordance with the 12- and 18-month audit frequencies.

It is the responsibility of the site to maintain certification. Where an audit is delayed beyond the due date, and as a result the existing certificate expires before a new certificate can be issued, the audit shall be classified as an initial audit and the next audit due date shall be within 12 months irrespective of the audit result.

The site shall be responsible for maintaining valid certification, while the certification body may assume responsibility for maintaining the ongoing audit programme.

TABLE 2 WORKED EXAMPLE OF AN INITIAL AUDIT FOLLOWED BY 12- AND 18-MONTH RECERTIFICATION AUDITS

AUDIT	EVENT	DATE	EXPLANATION
Initial audit (audit 1)	Initial audit date	1 February 2017	
	Certificate issue date	7 April 2017	The company takes 54 days to submit all corrective actions (90 days allowed as initial audit) The certification body takes 11 days to issue the certificate (14 days allowed)
	Certificate expiry date	14 March 2018	Anniversary of the audit date plus 42 days
	Re-audit due date	1 February 2018	12 months from the initial visit
Recertification audit (audit 2)	Actual re-audit visit	26 January 2018	Company is allowed a 28-day window before the audit due date
	Certificate issue date	25 February 2018	The company takes 20 days to submit all corrective actions (28 days allowed) The certification body takes 10 days to issue the certificate (14 days allowed)
	Certificate expiry date	14 March 2019 or 14 September 2019	This is 12 or 18 months plus 42 days from the initial audit date. This allows the site to take the audit up to 28 days early without losing time from the certificate
	Recertification audit due date	1 February 2019 or 1 August 2019	Company has corrected non-conformities and the certification body has issued the certificate within the allowed 42-day window

2.9.2 Certificate expiry – justifiable circumstances

There will be some circumstances where the certificate cannot be renewed on the 12-month or 18-month basis due to the inability of the certification body to conduct an audit. These justifiable circumstances, which would not result in the assigning of a major non-conformity (clause 1.1.10 in Requirements), can occur when the site is:

- situated in a specific country or an area within a specific country where there is government advice to not visit and there is no suitable local auditor
- within a statutory exclusion zone that could compromise product safety
- 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).

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 operation; however, audits must be undertaken while activities are taking place.

If the renewal of the certificate is prevented due to these exceptional circumstances, the customer may still decide to take products or procure services from that site for an agreed time, as customers may be able to demonstrate legal compliance by other means, such as risk assessment and complaints records, to show that the site is still competent to continue operation until another audit can be arranged.

2.9.3 Audits undertaken prior to due dates

The due date for a renewal audit occurs within a 28-day window prior to the 12-month or 18-month anniversary of the initial audit.

In some circumstances it is possible to undertake the audit earlier than this due date – for example, to allow a combined audit with another scheme. 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 audit due date will be 'reset' to be 12 months from this audit date
- the certificate shall be issued with an expiry date of 12 months (or 18 months, depending on the products being handled) + 42 days from the 'new' audit date.

3 UNANNOUNCED AUDIT PROTOCOL: OPTION 1 – FULL AUDIT

This voluntary option involves a single unannounced audit against all of the relevant requirements of the Standard. The date of the audit shall not be notified to the site in advance of the audit. The audit will be unannounced and replace the normal scheduled audit. Although this may occur at any stage between months 3 and 12 of the audit due date, it shall typically be within the last 4 months of the certification cycle

3.1 AUDIT PLANNING

3.1.1 Selection of the unannounced audit option 1 programme

The site shall notify its certification body within 3 months of the last audit date of its intention to join or remain within the unannounced audit programme. This allows the opportunity for the site to select an alternative certification body if required while allowing the audit to be undertaken at a time of the certification body's choosing.

3.1.2 Preparation by the company

The actual audit date will not be provided by the certification body and it is therefore important that the site has arrangements in place to receive an unannounced audit and facilitate the audit process.

Success at an unannounced audit relies upon the ability of the site to share information and knowledge within the site, to have effective deputies to cover in the absence of a particular manager, and a shared responsibility within the management team for product safety and compliance with the Standard.

3.1.3 Information to be provided to the certification body for audit preparation

The site shall supply the certification body with background information prior to the audit day to ensure the auditor(s) is fully prepared and to provide the best opportunity for the audit to be completed efficiently. The information will be requested by the certification body and may include but is not limited to:

- the process flow diagram
- a simple site plan
- the management organisational chart
- the list of product categories handled and/or service activities included within the audit scope
- typical shift patterns
- work schedules, to allow audits to cover relevant processes (e.g. night-time operation or dispatches that are not carried out each day)
- number of vehicles in operation and when vehicles will be on site
- recent quality issues, withdrawals or customer complaints and other relevant performance data.

The site shall make the previous year's audit report and certificate available to the certification body, where this is a contract with a new certification body.

As the audit will be unannounced it is likely that the certification body will also require additional information to plan for the logistics of the audit process. This may include:

- recommended local hotels
- specific site directions, site entrance requirements, car parking
- a list of contacts when first arriving on site
- specific protective clothing arrangements
- any specific security arrangements to follow to gain access to the site.

3.1.4 Nominating non-audit days

The unannounced option 1 programme allows sites the opportunity to nominate 15 days when the site is not available for an audit. The dates must be provided at least 4 weeks in advance and the reason must be provided (e.g. a planned customer visit). The certification body may challenge the reason where this does not appear appropriate.

Days when the site is not operating (e.g. weekends, public holidays, planned shutdowns for site holidays or maintenance) are not included within the 15 days. Any such days shall be notified to the certification body when opting into the unannounced scheme.

Certification bodies are expected to operate discretion in the case of emergencies.

It is a condition of electing to join the unannounced scheme that the auditor shall be granted access to the site for the audit on arrival. If access is denied the site will be liable for the auditor's costs and will revert to the announced audit scheme. At the discretion of the certification body, the existing certificate may also be suspended or withdrawn.

3.2 DURATION OF AUDIT VISIT

Sufficient information shall have been provided to the certification body when selecting this option to allow for the selection of an auditor with the correct category qualifications and to allow sufficient time for the audit. The same time shall be allowed for the unannounced audit as would be expected for the usual announced audit; however, the fact that it is not planned may lead to a longer audit.

The typical duration of an audit is 1.5 days (maximum 8 hours/day) at the site. Factors that may lengthen the duration of the audit include:

- the number of locations
- any need to witness the unloading of vehicles or to accompany drivers
- use of contracted services
- a large, widely dispersed site
- high numbers of site staff
- the audit not being carried out in the first language of the auditor
- difficulties experienced during the audit that require further investigation
- an ill-prepared site or poorly coordinated documentation.

Factors that may reduce the duration of the audit are:

- the exclusion of distribution from the scope of a storage site
- sites applying only for distribution
- limited product and process diversity
- low numbers of staff
- a modern purpose-built site
- quality management systems managed centrally and separately audited
- a well-structured and established hazard and risk management system
- a well-structured and established quality management system
- a well-briefed site prepared to provide the evidence required (procedures, records and other documentation).

The expected audit duration shall be notified to the site by the certification body in advance of the audit. Deviation from the expected audit timeframe must be justified and specified on the audit report.

3.3 THE ON-SITE AUDIT

Sites opting for the unannounced scheme shall be obliged to accommodate the auditor and allow the audit to start immediately on arrival at the site. The audit process will follow the same procedures as outlined for an announced audit. After a brief opening meeting the audit will always begin with the site inspection and this will be expected to commence within 30 minutes of the auditor arriving on site.

The on-site audit consists of the following seven stages:

- opening meeting – to confirm the scope and process of the audit
- inspection of site/storage facility (where applicable) – to review practical implementation of the systems, and interview of personnel
- document review – of the documented hazard and risk analysis, and quality management systems
- vehicle audit (where applicable) of a sample number of vehicles – to review practical implementation of the systems, and interview of personnel
- traceability exercise and check of associated records and documentation – this is a vertical audit, as specified within the BRC guidance document on auditing techniques
- final review of findings – conducted by the auditor in preparation for the closing meeting
- the closing meeting – to review audit findings with the site. (Note that non-conformities are subject to subsequent independent verification by the certification body management.)

The site shall fully assist the auditor(s) at all times. It is expected that at the opening and closing meetings those attending on behalf of the site will be senior managers who have the appropriate authority to ensure that corrective action can be progressed if non-conformities are found. The most senior operations manager on site or their nominated deputy shall be available at the audit and attend the opening and closing meetings.

During the audit, detailed notes shall be made regarding the site's conformities and non-conformities against the Standard and these will be used as the basis for the audit report. The auditor(s) shall assess the nature and severity of any non-conformity and shall discuss this with the accompanying manager at the time.

At the closing meeting, the auditor(s) shall present their findings and reconfirm all non-conformities that have been identified during the audit, but shall not make comment on the likely outcome of the certification process. Information on the process and timescales for the site to provide evidence to the auditor(s) of the corrective action to close non-conformities must be given. A written summary of the non-conformities discussed at the closing meeting will be documented by the auditor either at the closing meeting or within one working day after completion of the audit.

At the closing meeting the auditor(s) shall provide the site with an explanation of the BRC Directory which allows secure access to audit data to both the client and their nominated customers, together with the feedback systems available to communicate with the certification body and with the BRC Global Standards team.

The decision to award certification and the grade of the certificate will be determined independently by the certification body management, following a technical review of the audit report and the closing of non-conformities in the appropriate timeframe. The company will be informed of the certification decision following this review.

3.4 NON-CONFORMITIES AND CORRECTIVE ACTION

Non-conformities and corrective actions are the same as for the announced scheme (see section 2.5).

3.5 GRADING OF THE AUDIT

The process for grading is the same as for the announced audit scheme (see section 2.6).

The site shall either be certificated or not certificated based on the number of non-conformities and the ability to close them out. The grade awarded shall be based on the number and level of non-conformities, as outlined in Table 1. Note that the grade will have the addition of a plus symbol after the grade (i.e. AA+, A+, B+, C+ or D+).

3.6 AUDIT REPORTING

The audit reporting requirements are the same as for the announced audit scheme (see section 2.7). However, the report shall state 'Unannounced option 1'.

3.7 CERTIFICATION

The certification requirements are the same as for the announced audit scheme (see section 2.8); however, the certificate shall state 'Unannounced option 1'.

This certificate will supersede the existing certificate. The certificate shall be issued within 42 days of the audit and will have an expiry date based on the expiry date of the previous certificate plus 12 months, providing the site remains within the unannounced audit scheme. If the site decides to return to the announced audit programme, the certificate expiry date will be based on the date of the unannounced audit.

This ensures that where the audit occurs before the expiry of the current certificate and the site remains within the unannounced scheme, it is not disadvantaged by a shorter certificate life and increased frequency of audits.

3.8 ONGOING AUDIT FREQUENCY AND RECERTIFICATION

3.8.1 Scheduling re-audit dates

The site can choose whether to:

- remain within the unannounced option 1 programme
- transfer to the unannounced option 2 programme
- revert to the announced audit programme.

If the site wishes to remain in the option 1 programme the next audit will be unannounced. The audit may occur at any stage from 3 months after the last audit date through to 42 days prior to the certificate expiry date; however, this shall typically be within the last 4 months of the certification cycle. This allows sufficient time for corrective action to take place in the event of any non-conformities being raised without jeopardising continued certification.

It is the responsibility of the certification body to ensure that the audit is undertaken within the certification window.

If the site opts to move to the unannounced option 2 programme the rules for that programme will apply and the announced systems audit will occur within the 28-day window based on the initial audit date.

If the site wishes to withdraw from the unannounced audit programme, the next audit will be scheduled to occur within the 28 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.

4 UNANNOUNCED AUDIT PROTOCOL: OPTION 2 – TWO-PART AUDIT

The option 2 unannounced audit scheme divides the audit requirements into two separate audits. The first audit looks predominantly at the issues considered to be site operating practices, such as hygiene and product handling, and is carried out as an unannounced audit. The second audit is predominantly based on reviewing documentation and records and can be planned to ensure the appropriate management staff are available to retrieve and discuss the records.

The planned part 2 audit allows this part of the audit to be combined with other planned certification audits where these are used to reduce audit costs.

4.1 AUDIT PLANNING

4.1.1 Selection of the unannounced audit option 2 programme

The site shall notify its certification body within 3 months of the last audit date of its intention to join or remain within the unannounced audit programme. This allows the opportunity for the site to select an alternative certification body if required while allowing the audit to be undertaken at a time of the certification body's choosing.

The unannounced part 1 audit shall occur at any stage between months 6 and 10 of the audit cycle (i.e. 2 to 6 months before the audit due date). This allows sites to correct any non-conformities identified at the audit to enable these to be reviewed at the part 2 audit.

The part 2 audit of documentation and records shall be planned to occur in the 28 days up to and including the anniversary of the last audit date (i.e. in the same time window as an announced audit). The date for this audit is agreed with the site in advance of the audit.

4.1.2 Preparation by the company

The audit process for the option 2 scheme involves two separate audit visits and preparation for each may be slightly different.

Part 1 Unannounced audit

The actual audit date for the unannounced site operating practices audit will not be provided by the certification body and it is therefore important that the site has arrangements in place to receive an auditor and facilitate the audit process.

Success at an unannounced audit relies upon the ability of the site to share information and knowledge within the site, to have effective deputies to cover in the absence of a particular manager, and a shared responsibility within the management team for product safety and compliance with the Standard.

Part 2 Announced audit

The second half of the audit is a planned audit primarily auditing the documented systems and records. It is important that the relevant managers or deputies are available to assist in providing information required for the success of the audit. The part 2 audit will also include a visit around the site and review of actions taken following the previous part 1 unannounced audit.

The site shall ensure that the activities at the time of the audit cover those for the intended scope of the certification. Where possible, the widest range of activities shall be undertaken for the auditor(s) to assess. Where a product category or activity was not viewed at the time of the part 1 unannounced audit, then every effort should be made to ensure this activity is taking place for the part 2 audit.

Where a significant activity is undertaken only during a different period of the year from either audit, a further separate audit will be required to assess that activity.

4.1.3 Information to be provided to the certification body for audit preparation

This is as per unannounced audit option 1 (see section 3.1.2).

4.1.4 Nominating non-audit days

The unannounced option 2 programme allows sites the opportunity to nominate 10 days when the site is not available for an audit. The dates must be provided at least 4 weeks in advance and the reason must be provided (e.g. a planned customer visit). The certification body may challenge the reason where this does not appear appropriate.

Days when the site is not operating (e.g. weekends, public holidays, planned shutdowns for site holidays or maintenance) are not included within the 10 days. Any such non-activity days shall be notified to the certification body when opting into the unannounced scheme.

Certification bodies are expected to operate discretion in the case of emergencies.

It is a condition of electing to join the unannounced scheme that the auditor shall be granted access to the site for the audit on arrival. If access is denied the site will be liable for the auditor's costs and will revert to the announced audit scheme. At the discretion of the certification body, the existing certificate may also be suspended or withdrawn.

4.2 DURATION OF AUDIT VISIT

Sufficient information shall have been provided to the certification body when selecting this option to allow for the selection of an auditor(s) with the correct product category qualifications and to allow sufficient time for the audit. The same total time shall be allowed for the unannounced audit option 2 (parts 1 and 2) as would be expected for the usual announced audit. The time for the part 2 audit may be adjusted based on the findings from the unannounced part 1 audit; for instance, more time may be required if there are a large number of non-conformities with corrective actions to review following the part 1 audit.

The typical total audit duration is 1.5 days (8 hours/day) at the site with the time divided evenly between the part 1 and part 2 audits. If additional storage facilities, locations or head office assessments are included within the audit process, then additional time shall be allocated for this.

Additional time will be required for the review of any documentary evidence provided and completion of the final audit report.

The expected audit duration shall be notified to the site by the certification body in advance of the audit. Deviation from the expected audit timeframe must be justified and specified on the audit report.

4.3 THE ON-SITE AUDITS

4.3.1 Part 1 Unannounced audit

Sites opting for the unannounced scheme shall be obliged to accommodate the auditor and allow the audit to start immediately on arrival at the site. The audit process will follow the same procedures as outlined for an announced audit. After a brief opening meeting the audit will always begin with the site inspection and this will be expected to commence within 30 minutes of the auditor arriving on site.

The part 1 unannounced audit consists of the following stages:

- opening meeting – to confirm the scope and process of the audit
- inspection of site/storage facility (where applicable) – to review practical implementation of the systems, and interview of personnel
- vehicle audit (where applicable) of a sample number of vehicles – to review practical implementation of the systems, and interview of personnel
- document review – of documentation needed to complete the audit trail (e.g. pest control records)
- final review of findings – conducted by the auditor in preparation for the closing meeting
- the closing meeting – to review audit findings with the site. (Note that non-conformities are subject to subsequent independent verification by the certification body management.)

4.3.2 Part 2 Announced audit

The part 2 documentation audit consists of the following stages:

- opening meeting – to confirm the scope and process of the audit
- site inspection and vehicle audit (where applicable) – to review the standards and in particular the corrective actions taken in response to non-conformities identified during the part 1 audit
- document review – a review of the documented hazard and risk analysis and quality management systems
- traceability exercise and check of associated records and documentation – this is a vertical audit, as specified within the BRC guidance document on auditing techniques
- final review of findings by the auditor(s) – preparation for the closing meeting
- closing meeting – to review audit findings with the site. (Note that non-conformities are subject to subsequent independent verification by the certification body management.)

The site shall fully assist the auditor(s) at all times. It is expected that at the opening and closing meetings those attending on behalf of the site will be senior managers who have the appropriate authority to ensure that corrective action can be progressed if non-conformities are found. The most senior operations manager on site or their nominated deputy shall be available at the audit and attend the opening and closing meetings.

During both parts of the audit, detailed notes shall be made regarding the site's conformities and non-conformities against the Standard and these will be used as the basis for the audit report. The auditor(s) shall assess the nature and severity of any non-conformity.

At the closing meetings the auditor(s) shall present their findings and reconfirm all non-conformities that have been identified during the audit, but shall not make comment on the likely outcome of the certification process. Information on the process and timescales for the company to provide evidence to the auditor(s) of the corrective action to close non-conformities must be given. A written summary of the non-conformities discussed at the closing meeting will be documented by the auditor(s) either at the closing meeting or within one working day after completion of each part of the audit.

At the final closing meeting the auditor(s) shall provide the site with an explanation of the BRC Global Standards Directory, which allows secure access to audit data to both the client and their nominated customers, together with the feedback systems available to communicate with the certification body and with the BRC Global Standards team.

The decision to award certification and the grade of the certificate will be determined independently by the certification body management, following a technical review of the audit report and the closing of non-conformities in the appropriate timeframe. The company will be informed of the certification decision following this review.

4.4 NON-CONFORMITIES AND CORRECTIVE ACTION

Non-conformities and corrective actions are the same as for the announced audit scheme (see section 2.5).

Evidence of the action taken to correct non-conformities identified at the part 1 audit shall be submitted to the certification body within 28 days of the part 1 audit and will be subject to further review at the part 2 audit.

If a critical non-conformity and/or the number and level of non-conformities identified at the part 1 audit would result in the failure to achieve a certificate, the existing certificate for the site shall be immediately withdrawn.

4.5 GRADING OF THE AUDIT

The process for grading is the same as for the announced audit scheme (see section 2.6).

The grade awarded following certification shall be based on the number and level of non-conformities, as outlined in Table 1. Note that the grade will have the addition of a plus symbol after the grade (i.e. AA+, A+, B+, C+ or D+).

The grade awarded is based on the combination of non-conformities identified at the part 1 and the part 2 audits. Although the non-conformities identified on the part 1 audit should have been corrected before the part 2 audit, these shall be included in calculating the grade.

4.6 AUDIT REPORTING

The audit reporting requirements are the same as for the announced audit scheme (see section 2.7). However, the report shall state 'Unannounced option 2'.

The full audit report will include information and non-conformities identified at both the part 1 and part 2 audits. The final report will not be produced until after completion of the part 2 audit.

4.7 CERTIFICATION

The certification requirements are the same as for the announced audit scheme (see section 2.8). However, the certificate shall state 'Unannounced option 2'.

This certificate will supersede the existing certificate. The certificate shall be issued within 42 days of the part 2 audit and will have an expiry date based on the expiry date of the previous certificate plus 12 months, providing the site remains within the unannounced audit scheme. If the site decides to return to the announced audit programme, the certificate expiry date will be 6, 12 or 18 months, depending upon the scope of the audit.

4.8 ONGOING AUDIT FREQUENCY AND RECERTIFICATION

4.8.1 Scheduling re-audit dates

The site can choose whether to:

- remain within the unannounced option 2 programme
- transfer to the unannounced option 1 programme
- revert to the announced audit programme.

If the site wishes to remain in the option 2 programme, the audits will be undertaken as indicated by the audit planning rules above.

If the site opts to move to unannounced option 1, the rules for that programme will apply and the full unannounced audit will occur between 3 and 12 months after the initial audit date.

If the site wishes to withdraw from the unannounced audit programme, the next audit will be scheduled to occur within the 28 days up to and including the audit due date indicated on the certificate.

It is the responsibility of the certification body to ensure that the unannounced part 1 audit is undertaken within the audit window. It is the responsibility of the company to ensure that the announced part 2 audit takes place within the certification window to avoid the late audit non-conformity clause (1.1.10).

5 GENERAL PROTOCOL – POST AUDIT

5.1 COMMUNICATION WITH CERTIFICATION BODIES

In the event that any circumstances change within the site that may affect the validity of continuing certification, the site must immediately notify the certification body. This may include:

- legal proceedings with respect to product safety or legality
- product recall
- significant damage to the site (e.g. natural disaster such as flood or damage by fire)
- change of ownership
- significant change to the operation or scope.

The certification body in turn shall take appropriate steps to assess the situation and any implications for the certification, and shall take any appropriate action.

Information shall be provided to the certification body by the site on request so that an assessment can be made as to the effect on the validity of the current certificate.

The certification body may as appropriate:

- confirm the validity of certification
- suspend certification pending further investigation
- require further details of corrective action taken by the site
- undertake a site visit to verify the control of processes and confirm continued certification
- withdraw certification
- issue a new certificate with the new owner's details.

Changes to the certification status of a site shall be recorded in the BRC Global Standards Directory.

5.2 EXTENSION TO SCOPE

Once certification has been granted, any additional significant product categories stored or transported or activities undertaken by the site which are required to be included in the scope of certification must be notified to the certification body. The certification body will conduct a review and/or site visit to examine the aspects of the required extension to scope.

Where an extension to scope is required shortly before the certificate is due to expire, it may be more appropriate to undertake a full audit and issue a new certificate. This option should be agreed between the certification body and their client prior to undertaking the extension to scope audit.

When a revisit is considered necessary, the duration of this visit will vary depending on the aspects to be examined for the required extension to scope. The site visit should be conducted along the same principles as the original audit (i.e. including an opening meeting, inspection of the operation of the process, documentation trails and closing meeting). The revisit should be announced, irrespective of whether the site is certificated to the announced or unannounced scheme.

Identified non-conformities should be documented and actioned within the normal protocol of the Standard (i.e. the company has 28 days to provide appropriate evidence of close-out and the certification body should review the information and confirm the

certification decision in the normal manner). The additional non-conformities raised at the site visit will affect neither the current certificated grade nor continued certification. However, if practices are seen that give the certification body cause to doubt continued certification (e.g. the identification of a critical non-conformity) then the certification body shall arrange a full re-audit of the site. In these circumstances the current certificate shall be withdrawn.

A visit report should be documented, but shall not be in the format of a standard BRC audit report. A short explanation of the nature of the visit, what was audited and the conclusions should be given. The visit report should document what controls are in place and confirm the effectiveness of these controls. It should be clear in the report what aspects were looked at and what was excluded.

The site's current certificate will be superseded by any new certificate issued. The certificate must use the same expiry date as detailed on the original certificate. The due date of the next full audit will therefore remain the same and this should be made clear to the supplier by the certification body when arranging extension to scope visits. The grade shall also remain the same.

The certificate should include identification that it was a scope extension and the date of the visit.

5.3 CERTIFICATION WITHDRAWAL

The certificate may be withdrawn by the certification body in a number of circumstances where the site may no longer comply with the requirements of the BRC certification scheme and ISO/IEC 17065 requirement. Examples of these instances are:

- evidence that the site no longer complies with the requirements of the Standard, raising significant doubt over its operating standards and product safety
- failure to implement adequate corrective action plans within appropriate timescales
- evidence of falsification of records.

5.4 APPEALS

The company has the right to appeal the certification decision made by the certification body and any appeal should be made in writing to the certification body within 7 calendar days of receipt of the certification decision.

The certification body shall have a documented procedure for the consideration and resolution of appeals against the certification decision. These investigative procedures shall be independent of the individual auditor and certification manager. Individual certification bodies' documented appeals procedures will be made available to the site on request. Appeals will be finalised within 30 calendar days of receipt. A full written response will be given after the completion of a full and thorough investigation into the appeal.

In the event of an unsuccessful appeal, the certification body has the right to charge costs for conducting the appeal.

5.5 SURVEILLANCE OF CERTIFICATED COMPANIES

For certificated companies, where appropriate, the certification body or the BRC may carry out further audits or question activities to validate continued certification at any time. These visits may take the form of announced or unannounced visits to undertake either a full or part audit. Refusal of access to the site may affect certification status.

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

In the event that certification is withdrawn or suspended by the certification body, the company shall immediately inform its customers and make them fully aware of the circumstances relating to the withdrawal or suspension. Information on the corrective actions to be taken in order to reinstate certification status should also be provided to customers.

5.6 BRC LOGOS

Achieving BRC certification is something of which to be proud. Companies that achieve certification and have no exclusions from their scope are qualified to use the BRC logo on site stationery and other marketing materials. Information and conditions relating to the use of the BRC logo is available at **www.brcglobalstandards.com**

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.

The BRC logo is not a product certification mark and shall not be used on products or product packaging. Any certificated site found to be misusing the mark will be subject to the BRC complaints/referral process (see Part IV) and may risk suspension or removal of its certification.

The BRC logo may not be used by companies that do not include all products within the audit scope.

5.7 THE BRC GLOBAL STANDARDS DIRECTORY

The BRC Global Standards Directory (**www.brcdirectory.com**) is the database of all audits conducted against a BRC Global Standard, all certification bodies, all auditors and their recognised audit categories.

The directory holds full copies of all audit reports in read-only PDF. This includes archived audit documents from 2008 onwards.

Certification bodies are responsible for maintaining site name, address, audit content and certificate status. All certification bodies are assessed and graded by the BRC on how quickly and accurately they update audit data.

Audit reports can only be accessed following secure sign-in.

The directory also features a publicly accessible search function which displays certification data only. The public directory lists only currently certificated sites, not those expired or withdrawn.

Sites wishing to be excluded from public listing should contact their certification body.

5.7.1 Site code

Each audited site is allocated a unique seven-digit reference number known as a site code. This can be used to authenticate the validity of any certificate.

A site code is created when a site is audited for the first time and remains unchanged regardless of subsequent auditing certification bodies or audit status.

Site codes are located on the top right-hand corner of the first page of the audit report and on the corresponding certificate.

The listing for any certificated site can be located in the public directory by adding the site code to the 'Site Code' search field. If no results are returned for a search, contact the BRC to confirm certification authenticity.

5.7.2 Audit sharing

The directory allows audit owners to share their audit reports with customers including retailers, manufacturers, suppliers and other specifiers.

When audit sharing is set up, customers can access full current, archived and future audit documents (as they become available) without any further administration.

An audit owner can cancel sharing at any time. All sharing changes take immediate effect.

Audit documents shared in the directory cannot be edited or doctored by the audit owner. As such, audits obtained via the directory can be considered as complete and authenticated.

5.7.3 Notification emails

The directory notifies audit owners, and anybody who has shared access to the audit, if a site's certification is suspended, withdrawn or expires without replacement.

Notifications are via automated email and can be turned off if not required.

For further information on the directory or audit sharing, contact the BRC Directory Services team via **submissions@brcglobalstandards.com**

PART IV
MANAGEMENT AND GOVERNANCE

REQUIREMENTS FOR CERTIFICATION BODIES

TECHNICAL GOVERNANCE OF THE GLOBAL STANDARD

ACHIEVING CONSISTENCY – COMPLIANCE

PART IV
MANAGEMENT AND GOVERNANCE

REQUIREMENTS FOR CERTIFICATION BODIES

The Global Standard for Storage and Distribution is a process and product certification scheme. In this scheme, businesses are certificated upon completion of a satisfactory audit by an auditor employed by an independent third party – the certification body. The certification body in turn shall have been assessed and judged as competent by a national accreditation body.

The process of certification and accreditation is outlined in Figure 4.

In order for a business to receive a valid certificate on completion of a satisfactory audit, the organisation must select a certification body approved by the BRC. The BRC lays down detailed requirements that a certification body must satisfy in order to gain approval.

As a minimum, the certification body must be accredited to ISO/IEC 17065 by a national accreditation body affiliated to the International Accreditation Forum and recognised by the BRC.

Further details are available in the document Requirements for Organisations Offering Certification against the Criteria of the BRC Global Standards, available from the BRC on request.

Companies looking to become certificated to the Standard should assure themselves that they are using a genuine certification body approved by the BRC. A list of all certification bodies approved by the BRC is available on the BRC Global Standards Directory: **www.brcdirectory.com**

The BRC recognises that in certain circumstances, such as for new certification bodies wishing to commence auditing against the Global Standard for Storage and Distribution, accreditation may not yet have been achieved. This is because the accreditation process itself requires some audits to have been completed which will then be reviewed as part of accreditation audit of the certification body. The certification body must be able to conduct audits as part of achieving accreditation and so some unaccredited audits will be performed. This will be permitted where the organisation can demonstrate:

- an active application for accreditation against ISO/IEC 17065 from an approved national accreditation body
- that accreditation will be achieved within 12 months of the date of application and the experience and qualifications of the auditors in the relevant product category are consistent with those specified by the BRC
- that a contract is in place with the BRC and all other contracted requirements have been met.

The acceptability of audit reports generated by certification bodies awaiting accreditation but meeting the above criteria is at the discretion of individual specifiers.

TECHNICAL GOVERNANCE OF THE GLOBAL STANDARD

The BRC Standard and associated scheme is owned by the BRC and is governed through a number of committees (see Figure 5), each of which works to a set of defined terms of reference.

INTERNATIONAL ADVISORY BOARDS

The technical management and operation of the Standard is governed by the BRC international advisory boards. These consist of senior technical representatives of international retail and food manufacturing businesses in Europe, America and Asia.

The functions of the advisory boards are to provide strategic advice on the development and management of the BRC Global Standards and the activities to ensure the effective management of the certification bodies and audit process.

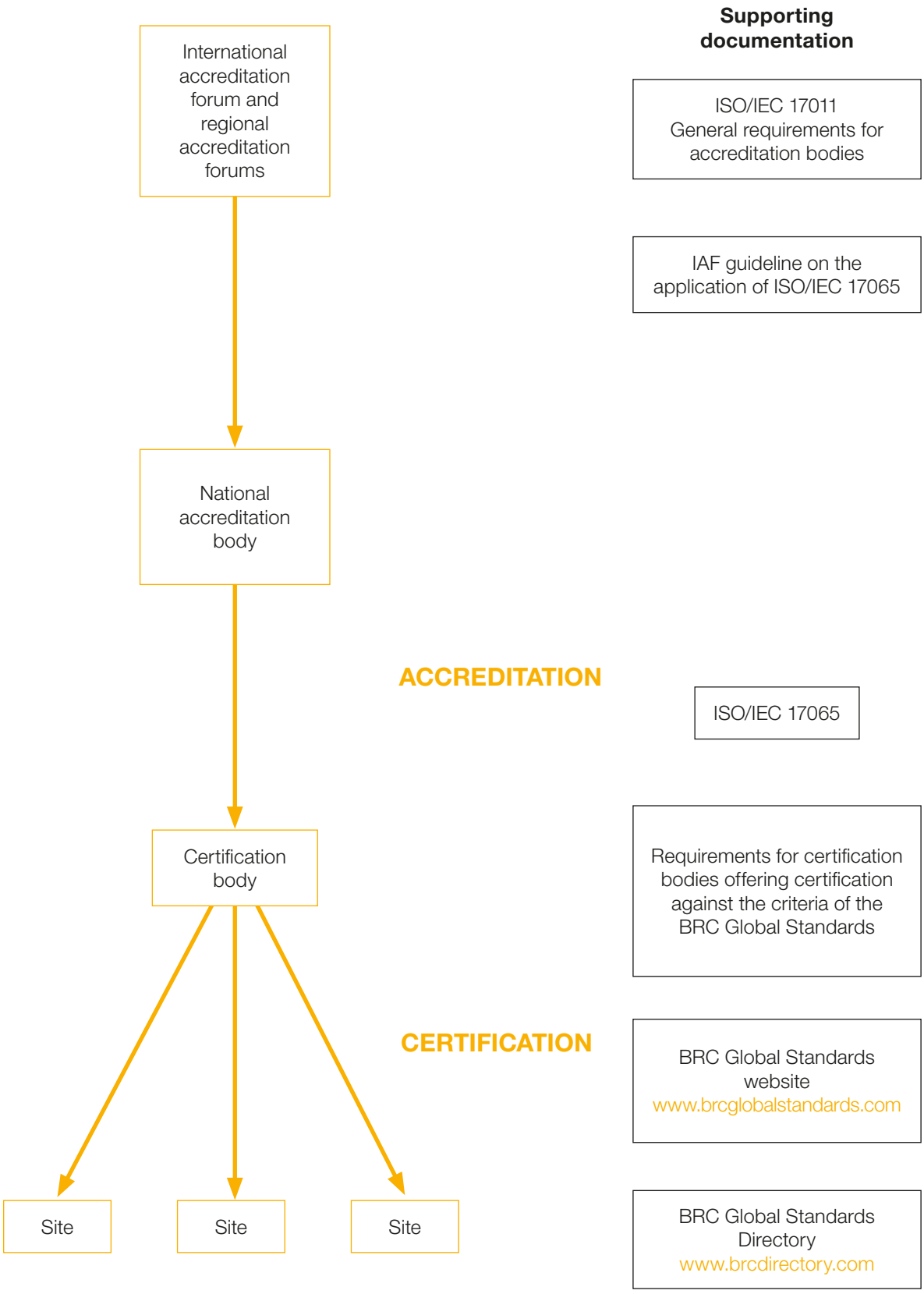

FIGURE 4 PROCESS FOR ACCREDITATION OF CERTIFICATION BODIES

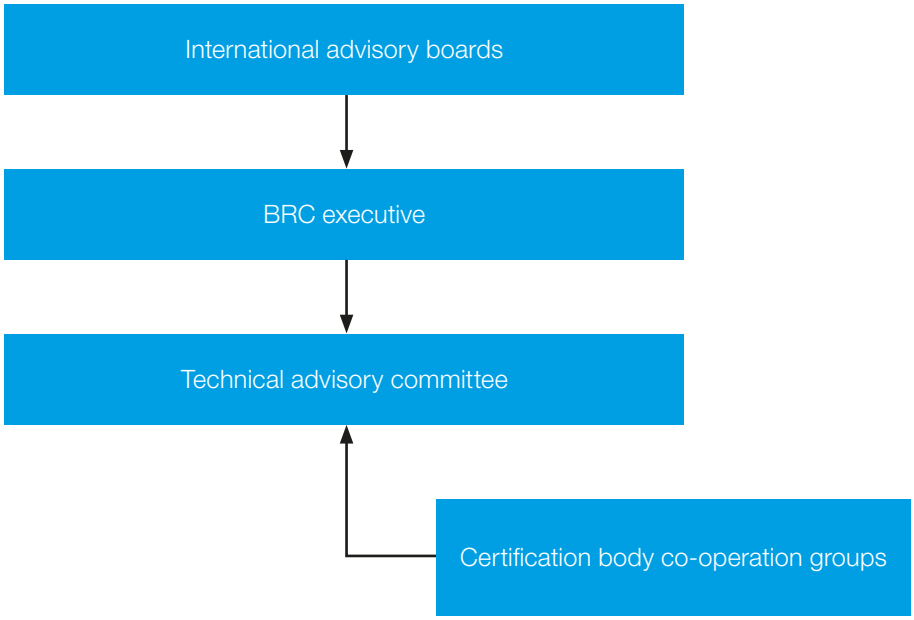

FIGURE 5 GOVERNANCE OF THE BRC SCHEMES

TECHNICAL ADVISORY COMMITTEE

Each BRC Global Standard is supported by a technical advisory committee (TAC) which meets regularly to discuss technical, operational and interpretational issues related to the Standard. The BRC provides the technical secretariat for these groups.

The TAC is made up of senior technical managers representing the users of the Standard and includes representatives of retailers, food service companies, wholesalers, storage and distribution operators, certification bodies and independent technical experts.

The Standard is reviewed periodically to assess the need for updating or production of a new issue. This work is undertaken by the TAC, which is expanded for the purpose to include other available expertise.

The TAC also reviews auditor competence requirements, proposed training materials and supplementary technical documents supporting the Standards.

THE CERTIFICATION BODY CO-OPERATION GROUPS

The BRC encourages and facilitates meetings of the certification bodies participating in the scheme (co-operation groups) to discuss matters arising on the implementation of the Standard and issues of interpretation. These groups report regularly to the BRC on operational issues, implementation and suggested improvements. Representatives from the cooperation groups attend the TAC meetings.

ACHIEVING CONSISTENCY – COMPLIANCE

The maintenance of a high and consistent standard of audit and certification, and the ability of the certificated sites to maintain the standards achieved at the audit, are essential to confidence in the scheme and to the value of certification. The BRC therefore has an active compliance programme to supplement the work of accreditation bodies and ensure high standards are maintained.

The BRC scheme may only be certificated by certification bodies registered and approved by the BRC and accredited by a BRC-recognised accreditation body. All auditors undertaking audits against the Standard must meet the BRC auditor competency requirements and shall be registered with the BRC. The qualifications, training and experience requirements for auditors who conduct audits against the BRC Global Standard for Storage and Distribution are detailed in Appendix 2. All audits undertaken against the Standard shall be uploaded to the BRC Global Standards Directory, which provides the BRC with an oversight of the activity of the certification bodies and the opportunity to review the quality of the reports produced.

To support the Standard, the BRC operates a compliance programme which reviews the performance of the certification bodies, samples the quality of audit reports, assesses levels of understanding of the scheme requirements and investigates any issues or complaints. As part of this programme the BRC provides feedback on the performance of each certification body through a key performance indicator (KPI) programme.

As part of the compliance programme the BRC audits the offices of certification bodies and accompanies auditors on audits at sites to observe the performance of auditors. The BRC may also undertake independent visits to certificated sites to ensure standards of product safety and quality are being maintained in line with its certification status and ensure that the audit and reporting process is to the expected standard.

CALIBRATING AUDITORS

A key component of the scheme is the calibration of the auditors to ensure a consistent understanding and application of the requirements. All certification bodies are required to have processes to calibrate their own auditors. An essential element of the training and calibration of auditors is the witnessed audit programme. Auditors are observed during an audit and provided with feedback on the performance of the audit. In order to ensure consistency between certification bodies and for the purposes of accreditation, an audit may be witnessed by a BRC representative or accreditation body auditor. Guidelines apply to these activities to ensure that sites are not disadvantaged by the presence of two auditors. This process forms an essential part of the scheme and sites are obliged to permit witnessed audits as part of the conditions for certification.

FEEDBACK

Companies audited against the Standard may wish to provide feedback to the certification body or the BRC on the performance of the auditor. Such feedback sent to the BRC will be considered in confidence. Feedback provides a valuable input to the BRC monitoring programme for certification body performance.

COMPLAINTS

The BRC has implemented a formal complaint process, which is available to organisations involved with the Global Standards. This is available on the website (**www.brcglobalstandards.com**).

From time to time, failure to apply the principles and criteria of the BRC Global Standards at certificated sites may be reported to the BRC by, for example, retailers and companies conducting their own audits. In this event, the BRC will conduct an investigation as appropriate and may undertake announced or unannounced visits to a certificated site.

APPENDICES

APPENDIX 1
OTHER BRC GLOBAL STANDARDS

The BRC has developed a range of Global Standards which set out the requirements for the wide range of activities undertaken in the production of food, consumer goods and packaging, as well as this Standard for storage and distribution.

The **BRC Global Standard for Food Safety** is an auditing standard which is applicable to food. This is the most mature of the BRC Global Standards and is extensively used in the food industry worldwide. This Standard applies wherever processes are undertaken which involve open or unpackaged food products. These products fall outside the scope of the BRC Global Standard for Storage and Distribution.

The **BRC Global Standard for Packaging and Packaging Materials** is an auditing Standard that lays down the requirements for the manufacturing of packaging materials used for food and consumer products. The Global Standard for Storage and Distribution applies only where no processing activities occur.

The **BRC Global Standard for Consumer Products** is an auditing standard that sets out the requirements for businesses that produce consumer products or are involved in the preparation of products as components for supply as retailer-branded (own-label) products or branded products. It can only be used at manufacturing or packing sites. The Standard also applies where companies are assembling component parts to produce a single saleable package. The Global Standard for Storage and Distribution may only be used where such assembly is carried out of components which are fully finished saleable products in their own right.

The **BRC Global Standard for Agents and Brokers** is an auditing standard which enables companies to be audited and certificated where they buy and sell products or provide services to other parties but are unable to gain certification to the production or storage and distribution standards because there is no product present to be audited.

APPENDIX 2
REGISTRATION, QUALIFICATIONS, TRAINING AND EXPERIENCE REQUIREMENTS FOR AUDITORS

All auditors conducting audits against the BRC Global Standard for Storage and Distribution are required to be registered with the BRC. The registration process identifies that auditors have undergone the required training, and it identifies the product categories in which auditors have expertise. Evidence of auditors' qualifications, experience and training has to be submitted to the BRC prior to them carrying out audits. All registered auditors receive a unique registration number, which is included on the audit report and is automatically cross-checked against their competence before the certification is accepted onto the BRC Directory.

It is the responsibility of the certification body to ensure processes are in place to assess, monitor and maintain the competence of the auditor to the level required by the BRC.

The BRC publishes a detailed guide to registered certification bodies on the auditor competency requirements, expectations of the initial assessment of auditor's competence, ongoing training and assessment procedures. This is reviewed and updated periodically by the Technical Advisory Committee. The following outlines the requirements of auditors who may be registered to audit against the Standard.

EDUCATION

The auditor ideally shall have a degree in a food, science, technology or logistics discipline or, as a minimum, have successfully completed a higher education course in a food, science, technology or logistics-related discipline.

WORK EXPERIENCE

The auditor shall have a minimum of 3 years' post-qualification experience related to the food, packaging, logistics or consumer product industries. This shall involve work in quality assurance or product safety functions within manufacture, retailing, storage and distribution, inspection or enforcement; and the auditor shall be able to demonstrate an understanding and knowledge of specific product categories of audit for which they are approved. The verification to carry out work within specific product categories will be carried out by the certification body and information provided in the auditor registration with the BRC.

QUALIFICATIONS

The auditor shall have:

- successfully passed a registered QMS Lead Assessor course (e.g. IRCA) or a BRC-recognised equivalent course with an exam
- successfully completed (as evidenced by examination) a training course in HACCP or hazard analysis principles of at least 2 days' duration based on the principles of Codex Alimentarius, and be able to demonstrate competence in the understanding and application of HACCP principles. It is essential that this training course is recognised by the industry sector (and its stakeholders) as being appropriate and relevant
- successfully completed an official BRC Global Standard for Storage and Distribution auditor training course and exam for Issue 3 of the Standard delivered by a BRC-approved trainer.

AUDIT EXPERIENCE

Auditors must have practical auditing experience of product certification schemes or quality management systems and must have successfully completed supervised training audits at a variety of organisations against the BRC Global Standard for Storage and Distribution.

Certification bodies must be able to demonstrate that every auditor has appropriate training and experience for the particular categories of audit for which they are considered competent.

PERSONAL ATTRIBUTES

The auditor shall exhibit professional conduct at all times, be objective, have good communication skills and maintain the integrity of themselves, their employer and the Standard.

The certification body is required to have a system in place to evaluate the personal attributes of all auditors (e.g. by supplier feedback forms) and maintain records of competence and training as appropriate.

GENERAL TRAINING OBLIGATIONS OF CERTIFICATION BODIES

Certification bodies must be able to demonstrate that every auditor has appropriate training and experience for the particular categories of audit for which they are considered competent.

Certification bodies must establish training programmes for each auditor, which will incorporate:

- a period of initial training covering product safety, HACCP/risk assessment and prerequisite programmes, and access to relevant laws and regulations
- a period of supervised training to cover quality management systems, audit techniques and specific category knowledge
- assessment of knowledge and skills for each category
- documented sign-off after the satisfactory completion of the training programme.

Each auditor's training programme shall be managed and approved by a technically competent person within the certification body who can demonstrate technical competence in the categories in which training is given.

Full detailed training records of the individual shall be maintained by the certification body throughout the term of employment and retained for a minimum period of 5 years after the auditor has left the employment of the certification body.

The auditor must be kept up to date with 'category best practice', have access to (and be able to apply) relevant laws and regulations, with records of updated training held by the certification body.

AUDIT CATEGORIES

It is recognised that the auditors shall have appropriate product knowledge of the categories of products that the site to be audited is storing or distributing. The categories have been defined on the basis of risk according to the chart below.

	PRODUCT CATEGORY
1	Chilled and frozen food
2	Ambient food
3	Packaging and packaging materials
4	Consumer products

It is recognised that a wide range of products are covered by the Global Standard for Storage and Distribution. It is the responsibility of the certification body to identify the products handled by the site being audited, and in particular to identify any products with specific handing requirements. Where such products are identified, the auditor must be made aware in advance of the audit in order to plan for the visit.

APPENDIX 3
CERTIFICATE TEMPLATE

Auditor number

CERTIFICATION BODY NAME OR LOGO

[Certification body name, certification body number] certifies that, having conducted an audit

For the scope of activities:

Exclusions from scope:

Product categories:

At COMPANY NAME
BRC SITE CODE
AUDIT SITE ADDRESS

Has achieved Grade:

Meets the requirements set out in the

BRC GLOBAL STANDARD for STORAGE AND DISTRIBUTION

ISSUE 3: AUGUST 2016

Audit programme: [announced, unannounced option 1 or option 2, reissued after extension to scope]

Date(s) of audit: [include two date ranges for unannounced option 2. If an extension to scope, include original audit date and visit date]

Certificate issue date:

Re-audit due date: from to

Certificate expiry date:

Accreditation body logo

Authorised by

BRC logo

Name and full address of certification body

Certificate traceability reference

This certificate remains the property of [name of certification body]

If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, please contact enquiries@brcglobalstandards.com or call the Tell BRC Hot line +44 (0)20 7717 5959.

Visit the BRC Diectory (www.brcdirectory.com) to validate the authenticity of this certificate

APPENDIX 4
PRODUCTS INCLUDED WITHIN THE SCOPE OF THE STANDARD

PRODUCT GROUPS	STORAGE	DISTRIBUTION	WHOLESALE	CONTRACT PACKING
Food products				
Pre-packed food for human consumption	✓	✓	✓	✓
Pet food/animal feed – pre-packed for retail sale	✓	✓	✓	✓
Fruit and vegetables in open containers	✓	✓	✓	No
Carcasses of meat – unwrapped	✓	✓	✓	No
Fish and other seafood loose in trays	✓	✓	✓	No
Live animals	No	No	No	No
Pre-farm-gate bulk agricultural products	No	No	No	No
Unprocessed bulk agricultural products	No	No	No	No
Bulk foods and ingredients, e.g. grain, flour, oil, sugar syrups, wine	✓	✓	No	No
Packaging materials				
Packaging materials for final conversion	✓	✓	✓	No
Finished packaging materials	✓	✓	✓	No
Consumer products				
Formulated products, e.g. cosmetics, detergents	✓	✓	✓	✓*
Hard lines, e.g. cookware, furniture	✓	✓	✓	✓*
Soft lines, e.g. textiles	✓	✓	✓	✓*
Electricals	✓	✓	✓	✓*
Toys	✓	✓	✓	✓*
Fuels and motor oils sold in bulk or refillable containers	No	No	No	No
Motor vehicles	No	No	No	No

*Fully assembled products packaged for retail sale only.

APPENDIX 5
GLOSSARY OF TERMS

In relation to terms used within this document, the following words shall have the following meanings:

Accreditation	Procedure by which an authoritative body gives formal recognition of the competence of a certification body to provide certification services against a specified standard.
Assembly packing	A process that assembles a collection of two or more market-ready finished products into outer packaging for sale as single product. Companies undertaking this process do not manufacture any of the component products, but are supplied with them for assembly into the final pack.
Audit	A systematic examination to substantiate whether activities and related results comply with planned arrangements and whether these arrangements are implemented effectively and are suitable to achieve objectives.
Auditor	A person possessing the appropriate competence and skills to carry out an audit.
Back-haul	To collect a load following delivery of products for return to the distribution depot or warehouse.
Branded product	Products bearing the logo, copyright or address of a company that is not primarily a retailer.
Business continuity	A framework that enables an organisation to plan and respond to incidents of business interruption in order to continue business operations at an acceptable predetermined level.
Calendar day	Includes working days and weekends but excludes periods of legal public holiday of the country in which the site and/or certification body is located.
Calibration	Set of operations that establish, under specified conditions, the relationship between values of quantities indicated by measuring instruments or measuring systems, or values represented by a material or reference material, and corresponding values realised by standards.
Certification	Procedure by which accredited certification bodies, based upon an audit and assessment of a site's competence, provide written assurance that a site conforms to a Standard's requirement.
Certification body	Provider of certification services, accredited to do so by an authoritative body and registered with the BRC.
Certification suspension	Where certification is revoked for a given period pending remedial action on the part of the site.
Certification withdrawal	Where certification is revoked. Certification may only be regained following successful completion of the full audit process.
Company	The entity with legal ownership of the site which is being audited against the BRC Global Standard.
Consumer products	Non-food products normally bought by or supplied to private consumers for personal or household use.
Control measure	Any action or activity that can be used to prevent or eliminate a product safety hazard or reduce it to an acceptable level.
Critical control point (CCP)	A step at which control can be applied and that is essential to prevent or eliminate a product safety hazard or reduce it to an acceptable level.
Cross-docking	Material is unloaded at distribution premises, and handled, but not formally put away into storage. This may be a staging area where inbound materials are sorted, consolidated, and temporarily stored until the outbound shipment is complete and ready to ship.

Customer	A business or person to whom a product or service has been sold, or on whose behalf product is collected, stored or delivered.
Customer focus	A structured approach to determining and addressing the needs of an organisation to which the company supplies products and which may be measured by the use of performance indicators.
Day	See calendar day.
Distribution	The transportation of goods within any container (goods on the move) by road, rail, air or ship.
Food	Products as defined by the EU Food Hygiene Regulations 178/2002.
Hazard	An agent of any type with the potential to cause harm or which would render products unacceptable.
Hazard analysis and critical control point (HACCP)	A system to identify, evaluate and control hazards which are significant for product safety.
Hub depot	A storage and distribution site receiving products from external companies and supplying products to other depots within the company's own distribution network (see satellite depot).
Incident	An event that has occurred resulting in the production or supply of unsafe, illegal or non-conforming product.
Initial audit	The BRC audit at a company/site which is not in possession of a valid BRC certificate. This may be the first audit at a site or a subsequent audit of a site whose certification has lapsed.
Internal audit	General process of audit, for all the activity of the company. Conducted by or on behalf of the company for internal purposes.
Job description	A list of the responsibilities for a given position at a company.
Key staff	Those staff whose activities affect the safety, legality and quality of the finished product.
Legality	Meeting all relevant legislation in the country (or countries) where the product(s) is/are intended to be supplied or sold.
Location	The geographical area within which individual premises reside in order to be classed as a single site for auditing purposes (i.e. a radius of 1 hour or 50 km from the usual place of work of the management team).
Loose/open food	Food ingredients or finished products that are unwrapped or not stored in packaging that is designed to protect the product when it is sold to the consumer, e.g. trays of fresh produce, meat carcasses.
Manufacturer	A company that produces product from raw material components, and packs the product into retail units or supplies product in bulk to a packing site to pack the product into retail units. A packer who packs product into retail units from bulk-supplied material can also be classed as a 'manufacturer'.
Non-conformity	The non-fulfilment of a specified product safety, legal or quality requirement or a specified system requirement.
Original copy	A document, whether in electronic or printed form, that has been legally obtained and does not infringe any copyright.
Premises	A physical building or place owned by the company and audited as part of a site.
Pre-packaged products	Products in their final packaging that is designed for sale to the consumer.
Procedure	Agreed method of carrying out an activity or process which is implemented and documented in the form of detailed instructions or process description (e.g. a flowchart).
Product recall	Any measures aimed at achieving the return of an unfit product from final consumers.
Product withdrawal	Any measures aimed at achieving the return of an unfit product from customers but not from final consumers.
Protective clothing	Clothing designed to protect the product from potential contamination by the wearer.
Quality	Meeting the customer's specification and expectation.

Quantity control	Check on amount of product in the consumer pack. May be related to weight, volume, number of pieces, size etc.
Retail brand	A trademark, logo, copyright or address of a retailer.
Retailer	A business selling products to the public by retail.
Retailer-branded products	Products bearing a retailer's logo, copyright, address or ingredients used to manufacture within a retailer's premises. These are products that are legally regarded as the responsibility of the retailer.
Risk	The likelihood of occurrence of harm from a hazard.
Satellite depot	A warehouse/distribution site receiving products only from another site within the same company.
Senior management	Those with strategic/high-level operational responsibility for the company and/or site.
Shall	Signifies a requirement to comply with the contents of the clause.
Site	A unit of a company; the entity which is audited and which is the subject of the audit report and certificate. A site may be made up of more than one premises within a location. For distribution this will be the address from which vehicles operate.
Specification	An explicit, detailed description of a material product or service.
Specifier	Company or person requesting the product or service.
Standard, the	The BRC Global Standard for Storage and Distribution, Issue 2.
Supplier	The person, firm, site or other entity to which a site's purchase order to supply is addressed.
Suspension	Where certification is revoked for a given period, pending remedial action on the part of the company.
Traceability	Ability to trace and follow raw materials, components and products, through all stages of receipt, production, processing and distribution and vice versa.
Trans-shipment	A direct transfer of goods from one vehicle or container to another.
User	The person or organisation (customer of the site) that requests information from the site regarding certification.
Validation	Confirmation through the provision of objective evidence that the requirements for the specific intended use or application have been fulfilled.
Vehicle	Any device used for the conveyance of product that is capable of being moved upon highways, waterways or airways. Vehicles can be motorised (e.g. a lorry), or non-motorised (e.g. container or rail truck).
Verification	Confirmation through the provision of objective evidence that specified requirements exist.
Where appropriate	In relation to a requirement of the Standard, the site will risk assess the actual requirement of the Standard and, where applicable, put in place systems, processes, procedures or equipment to meet the requirement. The site shall be mindful of legal requirements, best-practice standards, good manufacturing practice and industry guidance, and of any other information relating to the manufacture of safe and legal product.
Wholesaler	A distributor or middleman who purchases products to sell mainly to retailers, institutions or other companies rather than to consumers.
Wholesaler exclusive products	Products not bearing the wholesaler's logo but produced with a brand exclusively for sale and distribution by the wholesaler.
Wholesaler own brand	Products bearing a wholesaler's logo, copyright and address that are legally regarded as the responsibility of the wholesaler.
Work-wear	Company-issued or authorised clothing worn in the work place, usually to provide protection to the wearer or the wearer's own clothing.

APPENDIX 6
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