



Meat Supply Chain: A ‘How to’ Guide for BRCGS Audits

CONTENTS

-
- 1 Audits: Who, What, When, Why and How

 - 2 BRCGS Updates Relevant to Audits

 - 3 Overview of BRCGS Fundamental Requirements

 - 4 The Importance of Detection as a Corrective or Preventive Action and Site Standards Control

 - 5 Promoting Traceability

 - 6 Auditing Checklist: How to Start

 - 7 Conclusion

Meat Supply Chain: A ‘How to’ Guide for BRCS Audits

From high-profile recalls linked to contaminants to a changing regulatory environment, the focus of food safety efforts is evolving within and beyond companies. On a broad level and driven by changes like recent updates to BRC Global Standard for Food Safety Issue 8, including updates to the Additional Module 11 for the Meat Supply Chain, there is a greater emphasis on a [strong food safety culture](#), with a top-down, end-to-end prioritization on food safety.

On an organizational level, manufacturers are deploying more food safety measures and interventions, and moving to continually assess progress toward their food safety goals to ensure that products leaving their facilities are safe and traceable. As companies and regulatory agencies seek to assure that their combined efforts meet this new standard of food safety, audits in-turn are evolving, too.

Because of these changes, food safety plans and preparations for supply chain audits must be as dynamic as they are stringent and regularly reviewed, to allow for additional updates and evolving circumstances.

In addition to conducting their own internal audits, starting February 1, 2019, meat and poultry processors seeking BRCS certification must have onsite documented processes in their facility. These processes should have greater transparency, demonstrate effective traceability from slaughterhouse to distribution, establish actionable and corrective procedures for [foreign body removal equipment](#) as well as other requirements based on the new standard.

1. Audits: Who, What, When, Why and How

Specific to the BRC Global Standard for Food Safety Issue 8, as stated the first audits under the new requirements began on Feb. 1, 2019. The audits result in certification to the Standard, a process designed to establish a common standard for food safety and quality management and, at the same time, cut down on audit duplication. The BRC Global Standard is a benchmark for GFSI and other best food safety practices.



1.1 How to Start Preparing for Audits

Your organization is seeking certification to the BRC Global Standard, so an audit is in your company's future, and perhaps in the near future.

You can start preparing now for your audit, with some basic steps that include a thorough understanding of what's involved in a BRCGS audit and an evaluation of your current practices and vulnerabilities.

1.2 Outreach to Certification Body

Companies choose their own [certification body](#) and schedule dates for the audit visit. For meat and poultry companies seeking additional certification to the Meat Supply Chain Assurance Module, notify your certification body so they can schedule sufficient time as well as the appropriate qualified auditor.

1.3 Site Assessments, Identification of Areas for Improvement and Self-Audits

Most evaluations begin with a self-assessment, and a self-audit is a key part of preparing for an external BRCGS audit. Organizations should assess their current status and identify areas that could/should be improved.

Per the BRC Global Standard Food Safety Issue 8 Interpretation Guidelines: "This may, for example, relate to the structure of buildings, equipment requirements, the design of processes or the documentation and implementation of procedures."

1.4 Development of An Action Plan

An action plan is helpful in setting goals to achieve and educate employees on the audit process and what is expected of them. The written plan should outline for employees what is expected before, during and after an audit. Action plans also should address what is needed to fill in current gaps before the audit takes place.

1.5 Possible Consultation with Third Party Consultants/Experts

To get more insight and tap into others' audit expertise, you may want to meet with consultants or other third-party experts as you conduct a self-audit or gap analysis.

1.6 Who Conducts Audits?

To receive certification to the BRC Global Standard, a company must submit to and be graded on an audit. BRCGS staff and committees, however, do not conduct the actual audits. Rather that, the BRCGS organization is the "owner" of the standard that documents requirements and then controls the certification process.

Audits for the BRC Global Standard for Food Safety are conducted by certification bodies. Those certification bodies receive independent accreditation by organizations such as the American National Standard Institute or United Kingdom Accreditation Service. Some certification bodies are specifically qualified to conduct audits for certification to the Meat Supply Chain Assurance Module.

It is up to the company to choose an approved independent certification body.

1.7 When Audits Take Place

A company can schedule a planned audit or request an unannounced voluntary follow-up audit within three months of a qualifying audit.

For planned audits, the date(s) of the audit is agreed on

by the company and the chosen certification body. When scheduling dates, a manufacturer/processor should consider a time that is convenient for their operation and staff, and one that positions them in a way that strongly demonstrates their [commitment to a food safety culture](#). Other factors to take into account for the audit date: making sure products that are under scrutiny are being made during that time and ensure that key personnel are available.

Re-audit dates for the Standard, are within six months if a low grade of C or D is given or are generally around a year from the original audit date. Re-audits are agreed on by the company and the certification body for the retention of certification.

1.8 What to Expect on Audit Day

You've planned for, scheduled and confirmed an audit with a certification body. On the first day of the audit (audits are generally conducted over two to three days at the site), the auditor will arrive and meet with key company personnel, including senior management and head of operations. This meeting will cover background information on the company and the day's schedule and logistics, in addition to identifying employees and documents (such as HACCP documents) needed during the course of the audit.

Also during audits, traceability tests will be conducted onsite, per the auditor's request. Because that requires documentation, the BRCGS guideline suggests that companies start the process as soon as possible to have available what is needed.

The audit will conclude with a closing meeting in which the auditor will summarize his or her initial findings. The auditor will write the report within a day or so.

Facilities that have volunteered for the Meat Supply Chain Assurance Module will undergo a longer audit. How much time is needed is based on the number of raw materials and suppliers and the length of the supply chain, but is likely to be at least two to four extra hours.

If a meat processor isn't able to undergo a meat module at the same time as the audit to the BRC Global Standard, arrangements can be made for the same auditor to return to the site for a stand-alone audit. That stand-alone audit should take approximately 3.5 hours. Time will be needed for

traceability tests; if those tests aren't finished during the short standalone audit, the results must be forwarded to the auditor within "the time period permitted for the traceability test."

1.9 Unannounced Audits

To gain a competitive edge, companies may open themselves up to voluntary unannounced audits. This demonstrates a continual readiness for audits, and thereby, a strong commitment to a culture of food safety.

1.10 How Certification is Issued

Following the audit, companies receive an audit grade, which is one of the following: AA, A, B, C or D. Those who agree to unannounced audits get a plus sign (+) on their grade.

Meat companies who are seeking separate certification to the Meat Supply Chain Assurance Module do not receive specific letter grades. Those who pass are certified to the module; those who do not are not certified.

Initial findings are summarized by the auditor in the closing meeting. If found to have non-conformances, a company has 28 days to show that they have closed non-conformances to the root cause. When the certification body reviews all of the evidence, it will issue certification, which can take place up to 42 days from the audit date.

1.11 How Much do Audits Cost?

The cost of an audit for certification to the BRC Global Standard can vary. The third party certification body calculates its own fee, which is based on the auditor's expenses and the time and complexity of the particular audit. The BRC Global Standard also charges a service fee for audits paid directly through these third parties.

Beyond the cost of the audit itself, there can be expenses that cover the preparation for the audit, such as third-party consultations/training or other pre-audit upgrades.

2. BRCGS Updates Relevant to Audits

Audits for certification to the BRCGS reflect updates to Issue 8. Those changes, which are used as a framework and benchmark for food safety, were announced in 2018.

Among those changes is a compulsory requirement to create a food safety culture: a broader, company-wide mindset about food safety that is led by committed senior management. [Senior management members](#) are required to participate in review processes, including reviews of internal and independent audits.

Clause 1.1.11

The most senior production or operations manager on site shall participate in the opening and closing meetings of the audit for certification to the Standard. Relevant departmental managers or their deputies shall be available as required during the audit.

BRCGS Issue 8 also calls for the verification of a company's food safety culture and plans through internal audits. The updated BRCGS calls for a least four internal audits conducted during a given year.

Clause 3.4.1

There shall be a scheduled programme of internal audits. At a minimum, the programme shall include at least four different audit dates spread throughout the year. The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All activities shall be covered at least once each year. At a minimum, the scope of the internal audit programme shall include the:

- HACCP or food safety plan, including the activities to implement it (e.g. supplier approval, corrective actions and verification)
- prerequisite programmes (e.g. hygiene, pest control)
- food defence and food fraud prevention plans
- procedures implemented to achieve the Standard.

Each internal audit within the programme shall have a defined scope and consider a specific activity or section of the HACCP or food safety plan.

To be certified to the BRC Global Standard, companies engage with certification bodies to conduct independent audits on site, once or twice a year, depending on the results of the first audit.

Per the BRC Global Standard Food Safety Issue 8 Interpretation Guideline:

“Why is Certification required? Certification

to the Standard was developed to establish a common standard for food safety and product quality management, allowing brand owners to demonstrate control and satisfy legal responsibility for products and consumer safety, as well as reducing audit duplication for manufacturers.”

3. Overview of BRCGS Fundamental Requirements

Issue 8 includes a series of fundamental requirements deemed “crucial to the establishment and operation of an effective food quality and safety operation.”

These requirements, which are continual in nature and not something that can be quickly implemented prior to an audit, including the following:

- A. Senior management commitment:** To create an effective food safety culture, the commitment of senior management is necessary. That commitment includes leadership of food safety in general and, specifically, participation in audit meetings. Senior management leaders are also responsible for non-conformities related to the audit's findings:

Clause 1.1.12

The site's senior management shall ensure that the root causes of any non-conformities against the Standard identified at the previous audit have been effectively addressed to prevent recurrence.

- B. Food safety plans, i.e. HACCP:** Companies must have an effective and fully implemented plan that incorporates HACCP principles, as such plans are an essential component of a food safety culture and allow companies to identify and manage hazards that cause food safety risks.

Clause 2.7.1

The HACCP food safety team shall identify and record all the potential hazards that are reasonably expected to occur at each step in relation to product, process and facilities. This shall include hazards present in raw materials, those introduced during the process or surviving the process steps, and consideration of the following types of hazard:

- microbiological
- physical contamination
- chemical and radiological contamination

- *fraud (e.g. substitution or deliberate/intentional adulteration)*
- *malicious contamination of products*
- *allergen risks.*

C. Internal audits: Companies need to verify the efficacy of their food safety plans through internal audits, conducted by the company or an independent auditor on behalf of the company. Internal audits are also a key part of [HACCP plans](#).

Clause 3.4.2

Internal audits shall be carried out by appropriately trained, competent auditors. Auditors shall be independent (e.g. not audit their own work).

D. Management of raw materials and packaging: [Raw materials](#) that are received onsite as part of the production/manufacturing process must come from approved sources and be continually monitored, for possible foreign bodies.

Clause 3.5.1.1

The company shall undertake a documented risk assessment of each raw material or group of raw materials including primary packaging to identify potential risks to product safety, legality and quality. This shall take into account the potential for:

- *allergen contamination*
- [foreign-body risks](#)
- [microbiological contamination](#)
- *chemical contamination*
- *variety or species cross-contamination*
- *substitution or fraud*
- *any risks associated with raw materials which are subject to legislative control.*

E. Corrective and preventive actions: Companies need to show that they make corrections and prevent recurrence of any food safety failures. Non-conformities at the site must be subjected to corrective action, including those identified by product testing and quality assurance tests, such as [x-ray inspection](#).

Clause 3.7.1

The site shall have a procedure for handling and correcting failures identified in the food safety and quality management system.

Further, documentation is required on corrective action procedures that detail the process for handling non-conformities, including records of each non-conformity and actions taken to correct non-conformities.

For certification to the Meat Supply Chain Assurance Module, non-conformities are defined as Critical, Major and Minor. If or when non-conformities are found, the company must take corrective action; the process of fixing those non-conformities depends on the level and number of identified non-conformities. For example, those found to have critical non-conformities can't be certified for the module without a further full audit of the module.

F. Traceability: Companies need to have traceability systems in place from slaughter (in the case of meat companies seeking certification to the meat module) to production/processing to distribution. Traceability is also a good risk management tool for manufacturers that help them recall or withdraw products in the event a product has been determined to be unsafe. This should include a summary of documents referenced during the test, demonstrate links between them, they should occur annually at least, occur at a predetermined frequency and full traceability should be achievable within 4 hours.

Clause 3.9.1

The site shall have a documented traceability procedure designed to maintain traceability throughout the site's processes. At a minimum this shall include:

- *how the traceability system works*
- *the labelling and records required.*

For meat and poultry plants seeking certification for the additional Meat Supply Chain Assurance Module the following applies:

Module Clause 11.1.1

There shall be a supply chain map for all meat raw materials, which identifies each storage and processing facility in the full supply chain back to the place of slaughter. This shall include the site and company name; address and registration number, where applicable; type of operation (i.e. slaughter, cutting etc.); species handled. Where agents or brokers are used at any point in the supply chain, these shall be identified.

- G. **Layout, product flow and segregation:** A plant or facility's layout and flow should be set up to protect product integrity and prevent contamination, including physical contamination.
- H. **Management of allergens:** Companies must have a system for managing and minimizing risks related to allergens.
- I. **Control of operations:** Sites must ensure that food safety plans, including HACCP, are put into operation every day and effectively controlled.
- J. **Labelling and pack control:** Products shall be correctly labeled and coded. Failure to properly label and code is a common cause of recalls and product withdraws.
- K. **Training:** Companies must take steps to assure that all personnel are equipped to safely do their job, including proper training.

4. The Importance of Detection as a Corrective or Preventive Action and Site Standards Control

Preventing the physical contamination of products is a corrective and preventive action, and is also part of the BRCGS' Site Standard requirements.

Under the Site Standards requirement section of BRCGS Issue 8,

Clause 4.9

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

Clause 4.10

The risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies.

Clause 4.10.1

Documented assessment in association with the HACCP study shall be carried out on each production process to identify the potential use of equipment to detect or remove foreign-body contamination. Typical equipment to be considered may include:

- *filters*
- *sieves*
- *metal detection*

- *magnets*
- *optical sorting equipment*
- [x-ray detection equipment](#)
- *other physical separation equipment (e.g. gravity separation, fluid bed technology)*

Strong detection capability can prevent physical contamination of products during production. Facilities with detection systems, including x-ray systems, can demonstrate their commitment to food safety and compliance with fundamental requirements of the BRC Global Standard, including during an audit by a certification body.

Advanced inspection systems, such as multi-functional x-ray systems for contaminant detection and removal can be placed at [key control points on the line](#). Those key points will be assessed during an audit: at the receipt of raw materials, on the processing and production lines, and on the packaging line before distribution to customers and consumers.

As part of their self-assessment and self-audits prior to BRCGS audits, companies can determine if their current detection systems are up to the task of preventing physical contamination and assuring product integrity. A clear actionable plan should be put into place in case these detection machines fail to locate or remove contaminated product. 'Action shall include a combination of isolation, quarantining and re-inspection of all products produced since the last successful test or inspection.'

4.1 Promoting Traceability

Advanced detection systems with superior software capabilities can also address traceability requirements that will be checked during an independent BRCGS audit and also during internal audits conducted by a company during the year.

From slaughterhouse to end of line production for multiple meat and poultry products, these [systems deliver real-time data in one central database](#), resulting in better traceability for one or various production lines - whether in raw, bulk, packaged or boxed states. X-ray inspection systems provide demonstratable traceability with documented data of contaminated and rejected products for due diligence - from product reporting to machine maintenance and sanitation to continual machine testing.

5. Auditing Checklist: Get Started



Pre-audit:

- Gain an understanding of BRCGS Issue 8 changes and requirements, including the audit process
- Assure senior management commitment and involvement
- Conduct self-assessment and audits to determine current food safety culture and adherence to requirements
- Train or re-train, if necessary, employees on food safety procedures
- Find, schedule and confirm audit with certification body

During audit:

- Attend opening meeting with key personnel and senior management
- Audit production line and shifts; ensure pivotal employees are onsite
- Review results

Post-audit:

- Check other regulatory requirements specific to your location and business type
- Agree to a schedule of re-audits
- Conduct internal audits as required by BRC Global Standard Issue 8

5. Conclusion

Constant vigilance and adherence to food safety plans and procedures protects against food safety problems and also ensures your readiness for an audit. As food safety measures have changed and improved, so has the audit process, reflected in updates to the BRC Global Standard for Food Safety and Additional Module 11 for the Meat Supply Chain. Such audits include an assessment of fundamental requirements, like corrective and preventive action to protect against physical contaminants and entry points as well as site standards in place for increased traceability from entry and throughout the site.

[Advanced x-ray systems](#) can be put into place across a manufacturing site to mitigate food safety risks for meat or poultry and help achieve a higher audit score.

6. Additional Resources

British Retail Consortium (BRC)

www.brcglobalstandards.com

- Global Standard Food Safety Issue 8 – Guide to Key Changes
- Global Standard Food Safety Issue 8 – Changes and Challenges for the Organizations
- Global Food Safety Issue 8 – Interpretation Guideline
- BRCGS Culture Excellence – Food Safety Culture Module
- BRC Global Standard Food safety Issue 8 - Additional Module 11 Meat Supply Chain Assurance

Notes

Follow Eagle on Social



Eagle Advanced Insights Blog

Eagle's Advanced Insight blog offers in-depth information about the latest trends in product inspection. Here, our specialists share industry news, technology innovation and market trends with you. Visit our blog at www.eaglepi.com/blog to stay up-to-date.

The Knowledge Center

The Eagle website is packed with current industry relevant information. You will also find a [knowledge center](#) with white papers, webinars, videos, essential user documentation, animations, data sheets and case studies that showcase the latest issues, trends and innovations in food inspection technology.

As experts in product inspection technology, we will continue to develop our knowledge center to serve as a reliable source of information for industry professionals, providing a variety of data that will help you understand product inspection technology and applications specific to your industry.

Read More on BRCGS Audits



[Seeking BRCGS Certification: What You Need to Get Started](#)



[Your Preparation Checklist for a BRCGS Audit](#)



[How X-ray Inspection Technology Helps You Succeed in An Audit](#)

Eagle Product Inspection

1571 Northpointe Parkway,
Lutz, FL 33558, USA
+1-877-379-1670 (telephone)
+1-813-543-2049 (fax)

eaglesales@eaglepi.com
www.eaglepi.com

Royston Business Park, Royston,
Hertfordshire SG8 5HN, UK
+44 (0) 1763 244 858 (telephone)
+44 (0) 1763 257 909 (fax)

Subject to technical changes. © 02/2020 Eagle Product Inspection.

