



by **Richard Mallett,**

European Director of HACCP International

**T**he BRC Global Standard for Food Safety has, for the first time in its latest version (Issue 7 published January 2015), in addition to food safety management, considered issues that are not strictly related to food safety as



Richard Mallett, European Director of HACCP International

we all know it. And for good reason, in the wake of “Horse-gate” which uncovered, very visibly, the global problem of food fraud, and also in the wake of the proportion of food recalls which are still initiated because of failure of labelling and pack controls.

In this edition of HACCP International Food Safety Bulletin we look at an overview of the main technical changes from Issue 6 to Issue 7 of The Standard. For full details, take a look at The Standard itself.

The main changes can be summarised as belonging to the following categories, all mandated by specific clauses within The Standard:-

- Supplier approval, which includes a need to have a system to approve food supplied by agents and brokers.
- Traceability, which requires visibility of the traceability of foods purchased from agents and brokers.
- A brand new section called Labelling and Pack Control to specify measures to reduce the number of product recalls caused by incorrect information being supplied on labels and packaging.
- Authenticity, which requires the food business to challenge the source and identity of raw materials to militate against economically, motivated food substitution.
- Claims and Chain of Custody Controls to prove that foods such as Organic, “Free-from” and of geographical or special status are what they say they are!

### Agents, Brokers, approval and traceability

The practicality and convenience of buying a range of raw materials from brokers and agents, experts in the sourcing, procurement and resale of foods from around the world, cannot be disputed. But can you be totally sure of the source, identity and food safety management systems behind the foods you are buying? The Standard now requires that you consider Agents and Brokers in much the same

way as you do direct suppliers. In other words they should be formally approved on the basis that the Agent or Broker can furnish you with information on the traceability, identity and food safety of foods, from each link in the supply chain to their operation, and then on to you! Certification of these operations to the BRC Agents and Brokers Standard is one way in which approval can be secured. Otherwise control can only be assured by audit, review and challenge of HACCP systems, traceability and GMP systems in place within the supply chain to the Broker, in much the same way as you would do, and should do, for direct suppliers who do not hold current certification to a GFSI benchmarked Standard. Incidentally the supplier approval process even for direct suppliers has changed to permit supplier questionnaires to be used only for low risk foods! And your annual supplier risk assessment must now include challenge of potential vulnerability (see below).

### Labelling and pack control

A significant proportion of recalls are still the result of incorrect labelling or packaging, which, in the worst case, might fail to warn the consumer of the presence of allergens. The BRC has responded with a brand new, dedicated section within Section 6 of The Standard (Process Control) called, unsurprisingly, “Label and pack Control”! This section now demands a formal and recorded system for the correct allocation of packaging and labels to the packing area and a series of documented checks at start up and following changes of product to ensure that incorrect packaging and label is kept well away, to prevent its inadvertent use. The key task here is a review of the label to ensure that it is up to date and accurate. This section also brings in a need to check fail-safe’s and alerts where on-line vision equipment is used for product labels and printing. This new section is still supported by the Section 5 (Product Control) sections on Product Labelling and Product Packaging requiring properly specified food contact packaging, and processes to verify ingredient and allergen information, together with instructions for use, storage, safe handling and validate claims.

### Authenticity

The biggest change of all is not strictly related to food safety. It is related to food fraud. At a recent Cert-ID workshop called BRC Issue 7 “The Chain Reaction”, it was demonstrated to the delegates that in fact food fraud is not new, despite what we may all think following “Horse-Gate” where horse and other non-declared meats were found in a range of food products within Europe. In fact the concept of food fraud is ancient – with evidence of “additives” to flour such as sawdust and alum. In 1872 Dr. Hassall, the pioneer investigator into food adulteration and the principal reformer in this vital area of health, demonstrated that half of the bread he examined had considerable quantities of alum. And that’s just the tip of the medieval food fraud iceberg.

The fact is that no particular, specific standard was available or considered by the food industry to control this issue. So Issue 7 of the BRC Global Standard for Food Safety is welcome in this respect. Section 5.4 now requires a vulnerability assessment to be carried out and a process to be in place to access past, current and future (horizon scanning) threat to authenticity.

The key to the vulnerability assessment was explained comprehensively by Cert-ID during their recent workshops. One must consider and assess the various root causes and means of economically motivated food substitution or replacement:-

- Low availability of raw material due to for instance crop disease, crop failure or even geo-political unrest in source areas.
- The ease with which a particular food can be substituted by another.
- The value of the raw material – the higher the value, the more likely it is to encourage the criminal activity of food fraud.
- The availability, accuracy and use of analytical methods to determine purity.
- The length of the supply chain – the more numerous the links, the more likely fraud will go undetected.
- The credit rating of the supplier – are they in significant financial difficulty and maybe tempted by food fraud?
- The geographical source of raw material – some geographical areas are more commonly associated with food fraud
- The use of unverified and unchallenged suppliers - which considerably increases risk of food fraud, especially in conjunction with number 5 above (length of supply chain).

Once information on risk has been established, based on these and other root causes, controls should then be proposed to reduce the risk of food fraud. This may be by considering controls such as, but not necessarily limited to:-

- Shortening the supply chain length.
- Demanding certificates of analysis of purity with each batch
- Full audit and/or certification of the supply chain
- Demonstrable and full traceability within each link of the supply chain

Above all the vulnerability assessment must be documented, along the lines of HACCP – what are my authenticity hazards, which are the most significant (and for what raw materials), and what controls should we implement to reduce the risk? How and when should we review and verify the information supporting our vulnerability risk assessment, the vulnerability hazards we have identified and the controls we have implemented?

## Claims and Chain of Custody

In short The Standard requires that verification of specific provenance, origin, breed or varietal claims, assured status, GMO status and so forth is supported by appropriate certification or other appropriate means of documented verification. Clause 5.4.4 demands that facility must maintain purchasing records, traceability of raw material usage and final product packing records to substantiate any claims. Documented mass balance tests should take place at the frequency demanded by any specific scheme (for instance Organic Standard), or 6 monthly where no such frequency is stipulated.

The likelihood is that many food businesses are only just about now, nervously, getting to grips with these new requirements ahead of audits against Issue 7 which started on 1st July 2015. The principle however of audit against The Standard remains the same as it always has – make sure you are fully prepared, before the actual audit! In 3 years' time, I'm sure, we'll wonder what all the fuss was about! ❁



**HACCP Australia is delighted to announce courses to the BRC Global Standard for Food Safety, Issue 7**

The following training programs are currently being delivered as in-house and Public Courses in Australia.

- BRC Global Standard for Food Safety, Issue 7 - **Understanding the requirements - 2 days**
- BRC Global Standards for Food Safety, Issue 7 - **Implementing the standard - 2 days**
- BRC Global Standard for Food Safety, Issue 7 Conversion from Issue 6 to Issue 7 - **1 day course for manufacturers**
- BRC Global Standard for Food Safety, Issue 7 - **5 day Third Party Auditor Training**

The public courses are held in venues close to Sydney CBD. The in-house courses are held at sites or venues selected by clients. We can also hold the courses for small groups in our North Sydney office.

The courses are delivered by a BRC approved training provider and certificates of attendance for the course are issued by BRC UK.

**For more information on our BRC training, please contact our Sydney office on 02 9956 6911**

