We have written this workbook to assist in the implementation of your BRCGS food safety management system. The workbook is divided into 8 steps that are designed to assist you in implementing your food safety management system effectively:

✓ Step One: Introduction to the BRCGS Global Standard for Food Safety Issue 9
✓ Step Two: Senior Management Implementation
✓ Step Three: Food Safety Plan/HACCP Implementation
✓ Step Four: Food Safety Quality Management System
✓ Step Five: BRCGS Implementation Planning & Training
✓ Step Six: Internal Auditing Training & Checklists
✓ Step Seven: Final Steps to BRCGS Certification

The Workbook guides you through the process of implementing our BRCGS Food Safety Quality Management System, which is an ideal package for Food Manufacturers looking to meet British Retail Consortium Global for Food Safety 2022 (Issue 9).

1

This comprehensive system contains:

- ✓ Comprehensive Procedures Manual
- ✓ HACCP Manual containing the HACCP Calculator
- ✓ Laboratory Quality Manual
- ✓ Training Modules
    - → Implementing the BRCGS Food Safety Management System Training Module
    - → HACCP Training
    - → Internal Audit Training and Checklists
- ✓ FSQMS, Verification and Validation Record Templates
- ✓ Free online support via e-mail

As well as being updated this BRCGS Implementation Package includes additional management tools to help you achieve BRCGS certification:

- ✓ Allergen Management Module & Risk Assessment Tool
- ✓ Supplier Risk Assessment Tool
- ✓ Product Development Module
- ✓ BRCGS Risk Assessment Tool
- ✓ Complaint Management Guidelines & Analyser
- ✓ Hygiene Inspection Training
- ✓ Verification Schedule Risk Assessment Tool and Template

Step One: Introduction to the BRCGS Global Standard for Food Safety

This PowerPoint training module presentation will introduce the BRCGS Global Standard for Food Safety to the management team and explain how to start the process of implementing a BRCGS compliant Food Safety Management System.
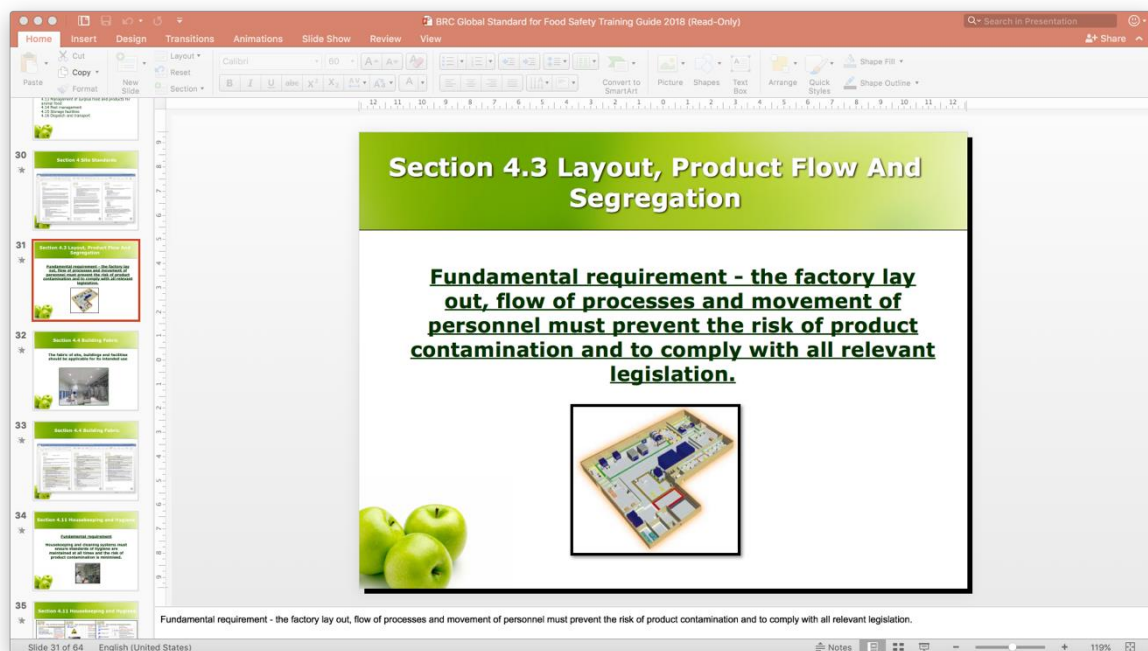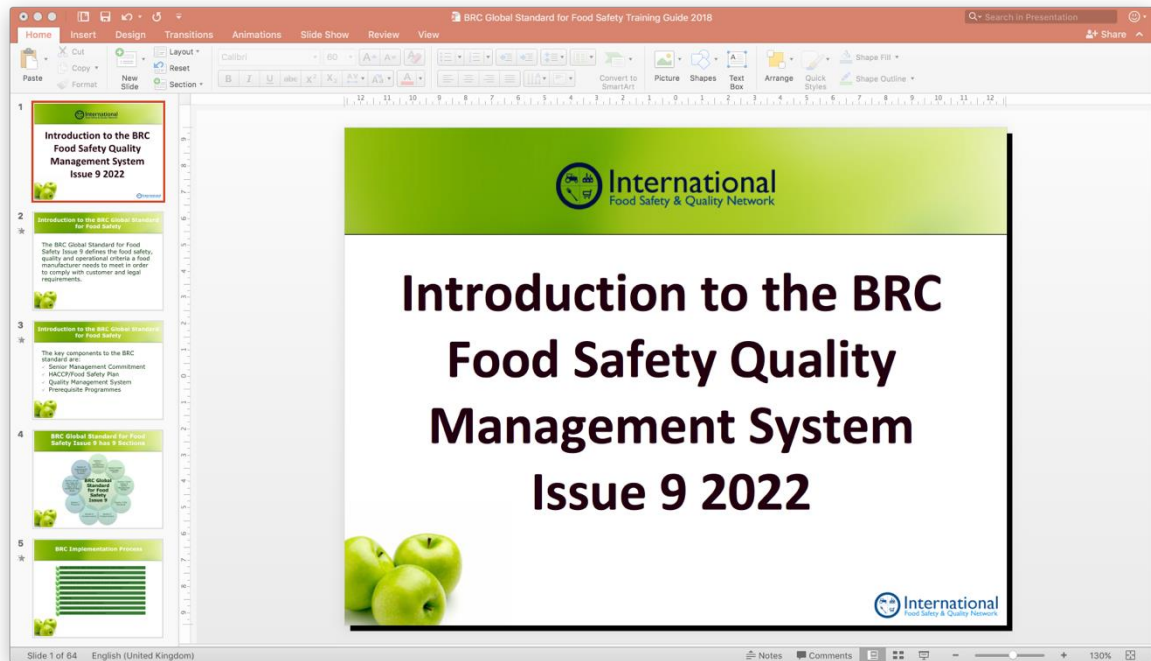
Step Two: Senior Management Implementation

A Senior Management Implementation checklist is provided that establishes your Food Safety Management System fundamentals including Food Safety Policies and Objectives.

The checklist guides Senior Management:

- ✓ in planning the establishment of the FSQMS
- ✓ in providing adequate support to establish the FSQMS
- ✓ in ensuring there is adequate infrastructure and work environment
- ✓ in allocating responsibility and authority

This stage requires the Senior Management to meet and establish the foundations for the Food Safety Management System:

- ✓ Formulating a checklist of Customer, Regulatory, Statutory and other relevant Food Safety requirements
- ✓ Decide which Food Safety requirements the company should address and develop relevant policies.
- ✓ Based on the Food Safety Policy Management Policies establish Food Safety Objectives
- ✓ Define the scope and boundaries of the FSQMS
- ✓ Plan the establishment of the FSQMS using the project planner
- ✓ Provide adequate support to establish the FSQMS
- ✓ Ensure there is adequate infrastructure and work environment and develop a Corrective Action Plan to rectify Prerequisite shortfalls
- ✓ Allocate responsibility and authority
- ✓ Assess, plan and establish appropriate internal and external communication (including the food chain) channels
- ✓ Plan to establish a food safety culture

As a decision has already been made to implement a system compliant with the BRCGS Global Standard for Food Safety, the Senior Management meeting should also consider the requirements of the Standard which are summarised below and should be read direct from the Standard:

Section 1 Senior Management Commitment	
The site's senior management shall demonstrate they are fully committed to the implementation of the requirements of the Global Standard Food Safety and to processes which facilitate continual improvement of food safety, quality management and the site's food safety and quality culture.	
1.1 Senior Management Commitment and Continual Improvement	
1.1.1	Documented Food Safety Policy - produce safe, legal and authentic products to the specified quality
1.1.2	Plan and Develop Food Safety & Quality Culture
1.1.3	Documented Food Safety Objectives for safety, authenticity, legality and quality
1.1.4	Management Review
1.1.5	Meeting Program
1.1.6	Confidential Reporting System
1.1.7	Human and Financial Resources
1.1.8	Informed of scientific/technical developments, industry codes of practice, new risks to authenticity of raw materials & relevant legislation
1.1.9	Current, Original Copy of the Standard
1.1.13	Logo & certification status
1.1.14	Appropriate registrations with the relevant authorities where required by legislation
1.2 Organisational Structure, Responsibilities and Management Authority	
1.2.1	Organisation Chart
1.2.2	Employees Are Aware of Responsibilities
1.2.3	Staff shall be aware of the need to report any risks
1.2.4	Use of external expertise

A meeting should now be co-ordinated involving all the Senior Management Team.

Senior Management FSQMS Implementation Meeting

Date

Time

Venue

Agenda

1. Formulating a checklist of Customer, Regulatory, Statutory and other relevant Food Safety requirements
2. Decide which Food Safety requirements the company should address and develop relevant policies.
3. Based on the Food Safety Policy Management Policies establish Food Safety Objectives
4. Define the scope and boundaries of the FSQMS
5. Plan the establishment of the FSQMS using the project planner
6. Provide adequate support to establish the FSQMS
7. Ensure there is adequate infrastructure and work environment
8. Allocate responsibility and authority
9. Assess, plan and establish appropriate internal and external communication (including the food chain) channels
10. Plan to establish a food safety culture

Attendees:

Senior Management Team		
Job Title	**Name**	**Role in Team**
Managing Director		Chairman
General Manager		Deputy Chair
Operations Manager		Operations Reporting
Technical Manager		Food Safety and Quality Reporting
Planning Manager		Planning and Capacity Reporting
Distribution Manager		Distribution Reporting
Maintenance Manager		Services and Engineering Provision
Finance Manager		Financial Reporting
Human Resources Manager		Resource reporting

Senior Management FSQMS Implementation Checklist

The Senior Management FSQMS Implementation Meeting should follow the guidelines of the Senior Management Implementation Checklist:

	Senior management formulate a checklist of Customer, Regulatory, Statutory and other relevant Food Safety requirements	
Action (i)	Customer/Regulatory/Statutory/Other	Record Details
	XYZ Customer Requires this	
	BRCGS Global Standard for Food Safety Issue 9	
	Food Regulations	
	CODEX Recommended International Code of Practice General Principles of Food Hygiene (2020) Chapter Two HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM AND GUIDELINES FOR ITS APPLICATION.	
	Senior Management decides which Food Safety requirements the company should address and develop relevant policies.	
Action (ii)	Requirement	Policy Details

At a later stage, Senior Management will be required to carry out a management review		
After implementation and verification Senior Management take action to continually improve the FSQMS		

The outputs from this meeting will be:

- ✓ Food Safety Policy
- ✓ Food Safety Objectives
- ✓ Defined Scope
- ✓ A Developed Project Planner
- ✓ Support Plan for Implementation/Training
- ✓ Plans for Infrastructure/Work Environment/Prerequisites
- ✓ Allocation of Responsibility/Authority
- ✓ Defined Communication Channels
- ✓ An Action Plan to lead and support a food safety culture within the site

11

Senior Management can choose/adapt the templates supplied with the system to assist in documenting policies and objectives:
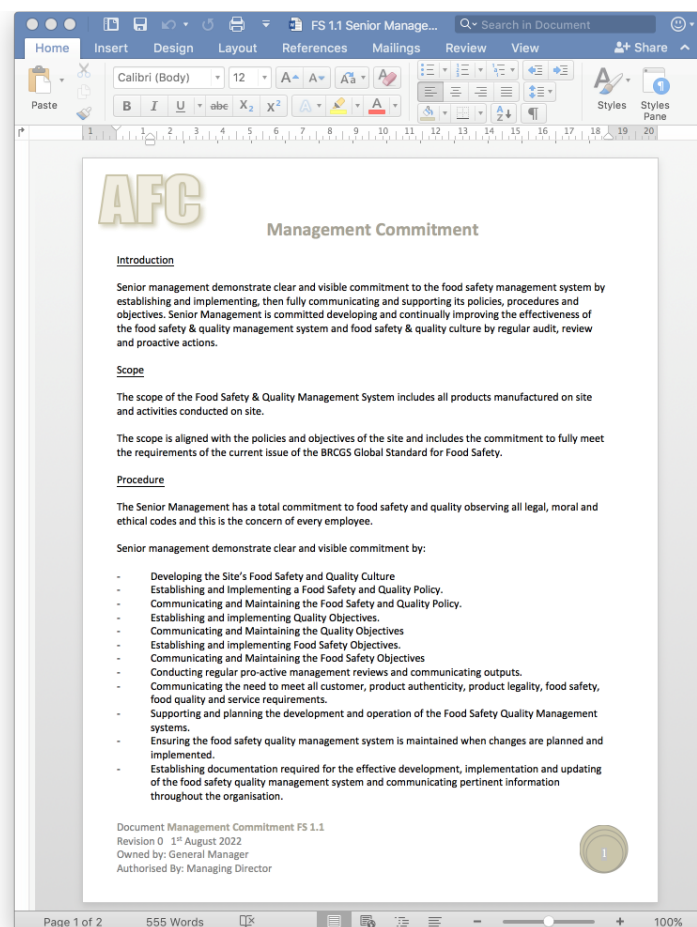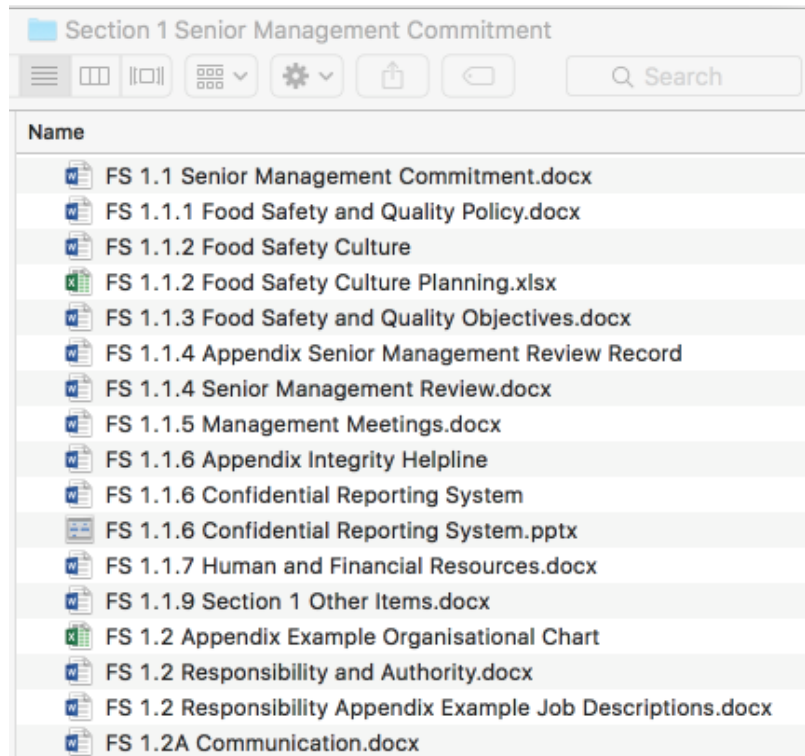
Senior Management Establish the Project Plan

Senior Management can adapt/use the template supplied with the system to establish a Project Plan.

Senior Management provide adequate support to establish the FSQMS

Senior management establish and provide adequate support to establish the FSQMS including the resource required to complete the implementation plan, establish, implement and maintain the Food Safety Management System, conduct Internal Audits and Monitor & Measure.

	Senior management provide adequate support to establish the FSQMS	
Action (vi)	Resource requirement	Details
	Food Safety Team Leader	
	Food Safety Team	
	FSQMS Steering Group	
	Trainers	
	Internal Auditors	

Senior Management allocate Responsibility and Authority Requirements

Senior Management establishes responsibility and authority levels. The scope of the defined responsibility and authority will include all staff, both full time and temporary. Staff responsibilities will include contributing to achieving site objectives and continuous improvement. The level of responsibility and authority of sub-contractors is defined in the procedure for the control of sub-contractors.

Responsibilities and authorities of all personnel should be communicated to them via induction and role training.

An organisational chart should be drawn to demonstrate the company structure with deputies for each management position. The identity of deputies should be communicated to all employees.

All Managers will need to have agreed and signed job descriptions for their individual roles which include responsibility and authority.

General Job descriptions including levels of responsibility and authority should be made available for all roles on site. All personnel should be required to sign the relevant general job description which is held with their individual training records. Responsibility for reporting any problems with the food safety quality management system should be detailed in individual job descriptions. The job descriptions include details of staff responsibility and authority to initiate and record corrective actions.

Specific responsibilities for key processes are to be documented within operational procedures. Individual objectives are cascaded in staff appraisals.

The Management Representative for Quality and Food Safety is the Technical Manager, who retains responsibility and authority for:

- Ensuring that Quality and Food Safety Management systems are established, implemented, maintained and updated.
- Reporting directly to senior management regarding system performance and suitability
- Presenting FSQMS information for senior management review so that actions for improvement can be determined.
- Ensuring that the Food Safety team are fully qualified and trained to meet the company requirements.

20

- Ensure the development of the HACCP Plan.
- Promotion of the awareness of customer requirements throughout the company.
- External communication and liaison regarding the management systems.

Remember the Food Safety/HACCP Team Leader should be able to demonstrate competence and experience of HACCP. Day to day responsibility of Food Safety should be the responsibility of the company

Site and Departmental Annual Objectives and targets are agreed and documented in the Management Review minute

Key Personnel and Nominated Deputies

Job Title	Job Holder	Nominated Deputy
Emergency Response Coordinator		
Food Safety/HACCP Team Leader		
General Manager		
Operations Manager		
Production Manager		
Warehouse Manager		
Maintenance Manager		
Factory Safety Manager		
Human Resource Manager		
Quality Manager		
Production Supervisor		
Packing Manager		
Technical Manager		
Planning Manager		
Goods Receipt Manager		
Design and Development Manager		
Planning Manager		
Customer Service Manager		
Laboratory Manager		
Distribution Manager		
Project Manager		

Senior Management Establish a Product Recall/Crisis Management Team

Crisis Management/Product Recall Team			
Crisis	**Name**	**Crisis Coordinator**	**Contact Details**
Fire or Site evacuation		Health and Safety Manager	
Utility Supply failure		Maintenance Manager	
IT systems failure		Operations Manager	
Water Supply Contamination		Technical Manager	
Breaches of security		General Manager	
Distribution Failure		Distribution Manager	
Bomb Threat or similar		General Manager	
Bioterrorism		Managing Director	
Extortion or Sabotage		General Manager	
Product quality or safety		Technical Manager	

Senior Management Establish Food Safety Responsibility & Authority Levels

Process	Responsible Persons	Activity
Purchases	Purchasing Manager	Purchase ingredients from approved and certified sources Ensure purchase orders comply with applicable specifications
	Quality Manager	Ensure adequate information on supply application form Ensure suppliers adhere to supply handling practices Perform suppliers audit or review supply status where necessary
Receiving and warehousing	QA/QC & Store Executives	Compare Purchase Order and Delivery note or check contracts as per Suppliers Specifications criteria (if applicable) Check receiving temperature, pest infestations, quality, packing conditions and truck hygiene. Observe unloading practices Handle incoming goods as per documented procedures Ensure Good Storage Practices and FIFO rotation principles
Preparation of Ingredients	QA/QC, Production Manager & Production Executive	Follow safe food preparation and handling practices Check environmental hygiene and safety Check equipment process performance and maintenance Check water quality and safety Check raw materials identification and traceability
Production	QC/QC, Production Manager, Supervisor & Operators	Maintain product recipes and characteristics Do not modify recipes prior to approval from top management Follow safe food handling practices Ensure Good Manufacturing Practices are adhered to Follow cleaning and sanitation standards and procedures Follow the handling standards of raw and processed foods
Holding and Filling of Processed Food	Production Supervisor & Operators	Follow safe food holding procedures Hold foods outside the range of danger zone Follow safe food filling procedures into primary packaging
Capping, coding and packing	Production Supervisor & Operators	Follow safe capping procedures Ensure food in primary packaging are hygienically located Ensure coding for traceability is performed to procedures Follow secondary packaging procedures to protect products

25

Senior Management Establish Food Safety Responsibility & Authority
Levels

Process	Responsible Persons	Activity

Step Three: Food Safety Plan/HACCP Implementation

HACCP Training

HACCP training is supplied to train your food safety team in the preliminary steps to a Hazard analysis, the principles of HACCP and Instructions in implementing your HACCP system.
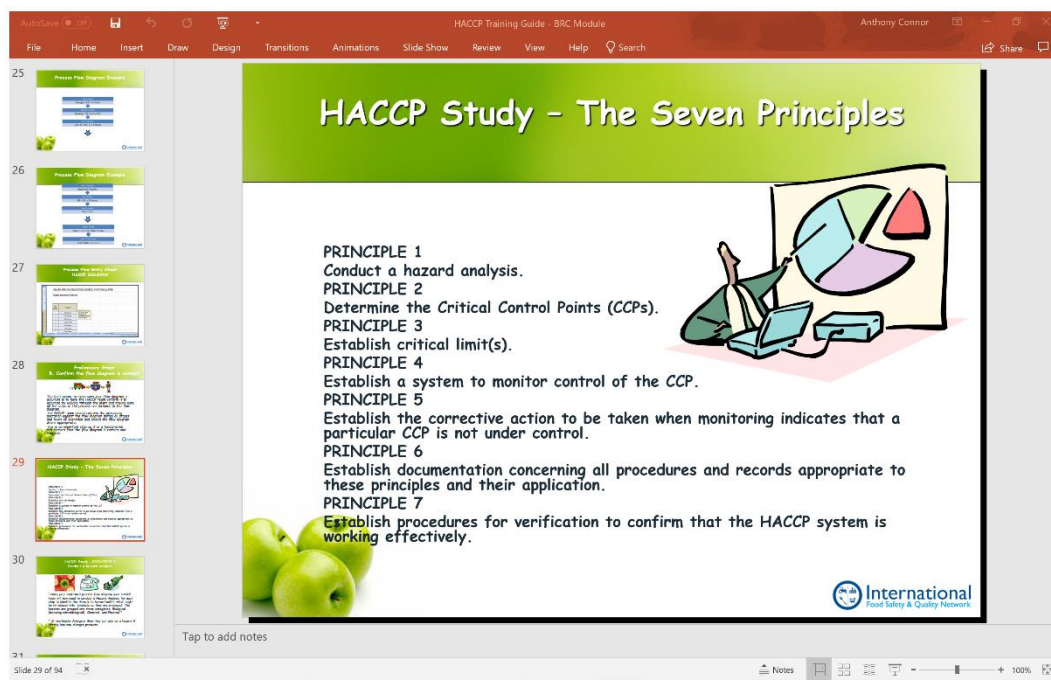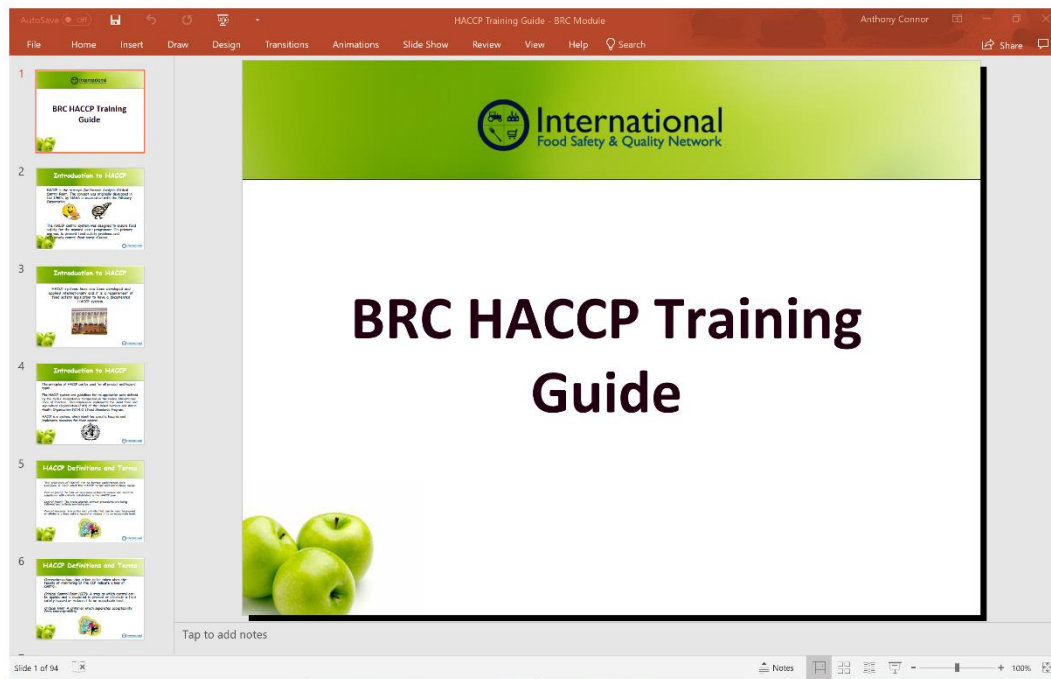
HACCP System

The HACCP System is implemented by following the FSQMS procedures:

FSQMS Section 2
FS 2 HACCP System
FS 2.1.1 HACCP Team
FS 2.1.2 HACCP Scope
FS 2.2 HACCP Prerequisites
FS 2.3 HACCP Product Description and Relevant Information
FS 2.4 HACCP Intended Use
FS 2.5 HACCP Flow Diagrams
FS 2.6 HACCP Flow Diagram Verification
FS 2.7.1 Hazard Identification
FS 2.7.2 Hazard Assessment
FS 2.7.3 Identification of Control Measures
FS 2.8 Identification of Critical Control Points (CCPs)
FS 2.9 Establishing Validated Critical Limits for each CCP
FS 2.10 Establishing a Monitoring System for each CCP
FS 2.11 Establishing a Corrective Action Plan
FS 2.12 Validating the HACCP Plan and Establishing Verification Procedures
FS 2.13 Establishing HACCP Documents and Records

Supplementary HACCP Tools and Documents
HACCP Calculator CODEX 2022 & BRCGS Issue 9 & Instructions

HACCP Implementation Tasks

HACCP Implementation Tasks are to be completed by the Food Safety Team using the guidelines included in this HACCP Implementation Section. We will go through the task by section as the requirements are listed in Section 2 of the BRCGS Global Standard for Food Safety. Note that the documents match the clauses of the section for ease of implementation.

This implementation is based on CODEX Guidelines for HACCP Application:

The Food Safety System has been developed based on CODEX Recommended International Code of Practice General Principles of Food Hygiene 2020 Edition - CHAPTER TWO - HAZARD ANALYSIS AND CRITICAL CONTROL POINT (HACCP) SYSTEM AND GUIDELINES FOR ITS APPLICATION - SECTION 3: APPLICATION

3.1 Assemble HACCP Team and Identify Scope (Step 1)
3.2 Describe product (Step 2)
3.3 Identify intended use and users (Step 3)
3.4 Construct flow diagram (Step 4)
3.5 On-site confirmation of flow diagram (Step 5)
3.6 List all potential hazards that are likely to occur and associated with each step, conduct a hazard analysis to identify the significant hazards, and consider any measures to control identified hazards (Step 6/ Principle 1)
3.7 Determine the Critical Control Points (Step 7/ Principle 2)
3.8 Establish validated critical limits for each CCP (Step 8/ Principle 3)
3.9 Establish a Monitoring System for Each CCP (Step 9/ Principle 4)
3.10 Establish corrective actions (Step 10/ Principle 5)
3.11 Validation of the HACCP Plan and Verification Procedures (Step 11/ Principle 6)
3.11.1 Validation of the HACCP Plan
3.11.2 Verification Procedures
3.12 Establish Documentation and Record Keeping (Step 12/ Principle 7)
3.13 Training

HACCP Implementation Guide Section 2.1 Food Safety Team

A core multidisciplinary team is utilised within the company to develop the Food Safety Management System and HACCP (Food Safety) plans. This team includes personnel from engineering, production operations quality assurance, technical management and other relevant functions with knowledge of the relevant raw materials, packaging, processing aids, products and associated processes. This core team is supplemented by other staff when specific areas or products are being analysed and by departmental staff who can contribute expert knowledge of their particular areas.

The HACCP team have knowledge and experience of HACCP, Products, the Process, the Equipment, and Associated Hazards. Food Safety Team Members have knowledge and experience of HACCP Systems and in developing and implementing a food safety management system.

Key personnel identified as HACCP team members are HACCP trained and have appropriate experience, all of which is documented on the HACCP teams training records. Expert external assistance is used as an aid, when in-house knowledge is limited, but day-to-day management of the food safety system remains the responsibility of the HACCP Team.

A typical HACCP Team may include:

Team Member	HACCP Training
Technical Manager	Advanced
Laboratory Manager	Intermediate
Processing Manager	Intermediate
Engineering Manager	Intermediate
Operations Manager	Intermediate
Warehouse Manager	Intermediate
Production Manager	Intermediate

38

Confirm your HACCP (Food Safety Team)

Food Safety Team			
Food Safety Team	**Name**	**Position**	**Qualification**

The HACCP Team is responsible for:

- Following HACCP procedures and constructing the Food Safety Plans
- Validation and verification of the HACCP system
- Review of the effects of any factory process or product change on the Food Safety Management System
- Updating Food Safety Plans as necessary

HACCP Implementation Guide Section 2.2 Pre- requisite programs

Prerequisite programmes are established including:

Cleaning and disinfection (FS 4.11)
Pest management (FS 4.14)
Maintenance programmes for equipment and buildings (FS 4.4 & FS 4.6)
Personal hygiene requirements (FS 7.2 & FS 8)
Staff training (FS 7.1)
Supplier approval and purchasing (FS 3.5)
Transportation arrangements (FS 4.16)
Processes to prevent cross contamination (FS 4.9 & FS 4.10)
Allergen management (FS 5.3)
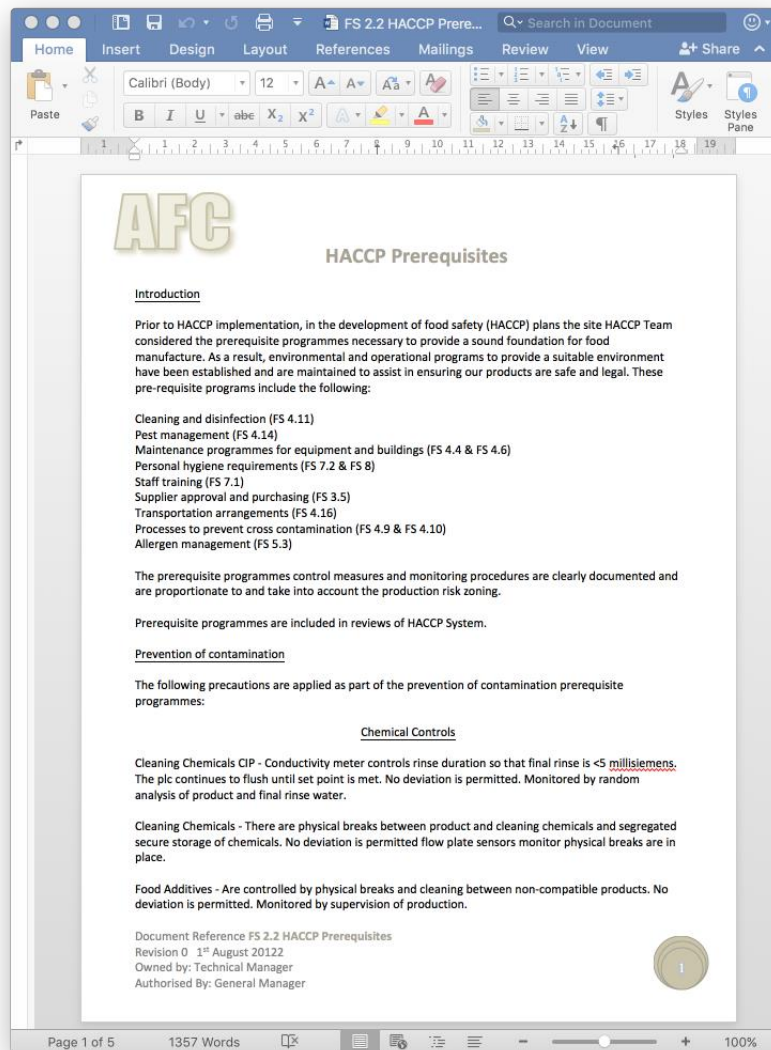
Use the Sample Product Description in the HACCP documents to assist you in compiling an end product description

HACCP Product Description

Product Description	Details
Product Name	Natural 1.5% Set Bio Yoghurt
Describe the product	Acidified coagulated milk product made from skimmed milk powder and whole milk powder, in which, after pasteurisation, lactic acid has been produced within the product by bacterial cultures Lactobacillus bulgaricus and Streptococcus thermophilus plus Bio cultures Bifidobacterium and Lactobacillus acidophilus. These organisms remain viable and abundant.
Details of the packaging	14g Printed Polyethylene terephthalate (PET) Pot Printed 30 micron PE lid with sealing lacquers Plastic packing tray
Composition of the product	7% Protein 1.5% Fat 14% Total Solids
Preservation from chemical composition	pH < 4.5
Microcidal treatment	Pasteurised > 71.7 °C > 15 seconds
Shelf life	14 Days
Storage temperature	< 8 °C
Consumers	All groups including elderly and children

Document Reference HM 002 HACCP Product Description
Revision 0   1st August 2022
Owned by: Technical Manager
Authorised By: General Manager

1

HACCP Implementation Guide Section 2.4 Identify Intended Use

The food safety management team identify all possible users and consumers for each product and process category. Vulnerable consumer groups in particular are considered for each food safety hazard.

HACCP Implementation Guide Section 2.5 Construct a Process Flow Diagram

The Food Safety Team should be responsible for constructing flow diagrams for the products and process categories covered by the scope of the food safety management system as an overview of the process and where there is a potential for occurrence, increase or introduction of food safety hazards.

The Flow diagrams should be accurate and clearly show:

The sequence and interaction of all steps
Outsourced processes
Subcontracted work

The Flow diagram should clearly show the stage(s) that:

Raw Materials enter the flow
Ingredients enter the flow
Intermediate Products enter the flow
Packaging Materials enter the flow
Reworking and/or Recycling take place
End Products leave the flow
Intermediate Products leave the flow
By products leave the flow
Waste leaves the flow

Flow Diagram Example

Yoghurt Flow Diagram 1

Document Reference HM 001 Stirred Yoghurt Flow Diagram 1
Revision 1st August 2018
Owned by: Technical Manager
Authorised By: General Manager
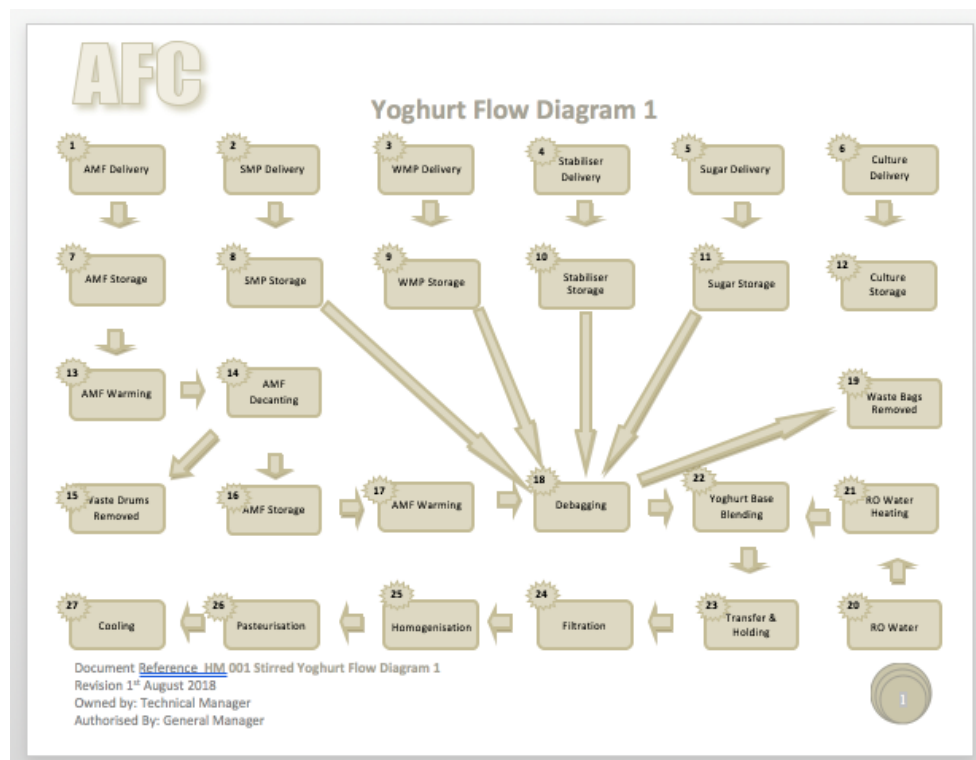
The steps in the process should be entered into the Process Flow sheet:

Process Worksheet

Step Number	Step Name
1	Delivery of Ingredient A
2	Delivery of Ingredient B
3	Delivery of Ingredient C
4	Delivery of Ingredient D
5	Packaging Removed
6	Filtration

The food safety team specify acceptable levels for each hazard

For each Food Safety Hazard Identified, the acceptable level of the hazard in the end product is determined, justified and recorded taking into account regulatory requirements, customer food safety requirements, historic information, scientific literature, professional experience and intended use by the customer.

This hazard list is referred to as a preliminary hazard list and covers all hazards that could potentially occur in the product.

The hazards identified should be entered into the list of Hazards on the sheet in the HACCP manual:

Step Number	Step Name	Hazards Identified
1	Delivery of Ingredient A	Bone
1	Delivery of Ingredient A	Campylobacter spp.
1	Delivery of Ingredient A	Contamination with Bacteria from pests
1	Delivery of Ingredient A	Pesticides
1	Delivery of Ingredient A	Salmonella spp. (S. typhimurium, S. enteriditis)
1	Delivery of Ingredient A	Bacteria (spore-forming) General
1	Delivery of Ingredient A	Pest control chemicals

The food safety team assess the food safety hazards

Each potential food safety hazard should now be risk assessed by the Food Safety Team to determine whether its elimination or reduction to acceptable levels is required to produce a safe product and also any controls required to achieve the acceptable levels.

For each step grades of impact (severity of adverse health effects) and probability (likelihood of a food safety hazard occurring) need to be allotted and the combined matrix used to judge the severity and priority for elimination or minimisation of the hazard.

The Food Safety Team should identify the hazards that need to be prevented, eliminated or reduced to acceptable levels.

The Food Safety Team need to consider the probability of the hazard occurring, the severity of the hazard on the consumer, the vulnerability of the targeted consumer, the survival and multiplication of any biological hazards and any likely toxin production, the presence of chemicals or foreign bodies, contamination at any stage in the process and possible deliberate contamination or adulteration.

Taking these factors into account a rating is given for probability and severity and entered:

Step Number	Step Name	Hazards Identified	Probability	Severity	Significance
1	Delivery of Ingredient A	Bone	1	3	3
1	Delivery of Ingredient A	Campylobacter spp.	2	3	6
1	Delivery of Ingredient A	Contamination with Bacteria from pests	3	3	9
1	Delivery of Ingredient A	Pesticides	3	1	3
1	Delivery of Ingredient A	Salmonella spp. (S. typhimurium, S. enteriditis)	3	3	9
1	Delivery of Ingredient A	Bacteria (spore-forming) General	2	2	4
1	Delivery of Ingredient A	Pest control chemicals	1	1	1

First, the Food Safety Team assesses the likelihood of the hazard occurring and enter:

- 1 for Highly Unlikely
- 2 for Possible
- 3 for Likely

Then the Food Safety Team assesses the severity of the hazard and enters:

- 1 for Not Severe
- 2 for Could possibly cause illness
- 3 for Severe (Could be fatal)

The Food Safety team should factor in the vulnerability of the targeted consumer, the survival and multiplication of any biological hazards and any likely toxin production, the presence of chemicals or foreign bodies,

52

HACCP Implementation Guide Section 2.8 Determine the Critical Control Points

Identification of Critical Control Points (CCPs)

The Hazard Assessment is conducted using the HACCP Calculator (BRC HACCP Calculator CODEX 2022 BRC 9 xlsx file) to answer the decision tree questions and indicate the critical control points.

If a significant hazard is identified at a step in the process, but no control measure exists, then the process has to be modified to include an appropriate control measure.

The Hazard Analysis:

Question 1 Question 1: Can the significant hazard be controlled to an acceptable level at this step by prerequisite programs (e.g. GHPs) *?
Question 2 Question 2: Do specific control measures for an identified significant hazard exist at this step?

Question 3 Will a subsequent step prevent or eliminate the identified significant hazard or reduce it to an acceptable level?
Question 4 Can this step specifically prevent or eliminate the identified significant hazard or reduce it to an acceptable level?

The HACCP Calculator highlights significant hazards and critical control points in dark red.

Document Reference Identification of Critical Control Points (CCPs) FS 2.8
Revision 0   1st August 2022
Owned by: Technical Manager
Authorised By: General Manager

HACCP Plan

Critical Limits	Monitoring Procedures	Corrective Action	Responsibility	HACCP Record
Minimum / Maximum acceptable levels to ensure condition is in control	- measurements to be taken (or observations) method of measurement - devices used (including applicable calibration procedures) - frequency of monitoring - responsibility and authority for monitoring and evaluation of the monitoring results	Action to be taken when outside of critical limits to regain control and ensure unsafe product is controlled	Who is taking the action	Where is it recorded

Design of the HACCP Plan

The Food Safety Team need to formulate and document a HACCP plan defining the hazards to be controlled, CCPs where hazards are controlled, critical limits and monitoring procedures at each CCP and action to be taken when critical limits are exceeded. The HACCP plan needs to define those responsible for performing monitoring procedures and the records where the monitoring results are recorded.

The food safety team identify critical control points (CCP) s for each food safety hazard

Critical Control Points are established using the decision tree as the latest step in the flow path where controls can be effectively administered for a particular Significant Food Safety Hazards.

HACCP Implementation Guide Section 2.9 Establish Validated Critical Limits for each CCP

The food safety team determine the critical limit for each CCP

For each Critical Control Point the Food Safety Team should identify the appropriate control measure(s) and critical limits for each CCP monitoring procedure.

The critical limits should be specific for each Significant Hazard identified and where more than one food safety hazard has been identified at a CCP then critical limits should be established for both hazards and the most stringent limit applied.

Control Measures and Control Limits should be defined. They are often using guidance from the external approved documents including codes of practice and regulatory requirements. The Food Safety Team should justify and document how critical limit levels have been determined.

Critical Limits based on subjective data such as visual inspections should be supported by specific procedures, specifications, education/training and where applicable photographs.

HACCP Implementation Guide Section 2.10 Establish a Monitoring System for Each CCP
The food safety team determine and establish monitoring procedures and records for each CCP

The Food Safety Team should now establish monitoring procedures and records for each CCP to include all scheduled measurements (or observations) in relation to the critical limit.

The procedures and records should define:

- ✓ measurements to be taken (or observations)
- ✓ method of measurement
- ✓ devices used (including applicable calibration procedures)
- ✓ frequency of monitoring
- ✓ responsibility and authority for monitoring and evaluation of the monitoring results

When determining monitoring procedures, the Food Safety team should take into consideration the operational flow and monitoring result timeframes to ensure that the monitoring method and frequency are capable of identifying a breach of critical limits so that product can be isolated before being used or consumed.

HACCP Implementation Guide Section 2.11 Establish a Corrective Action Plan

The food safety team determine the corrections and corrective actions to be taken when monitoring results exceed critical limits

For each CCP Corrections and Corrective actions when critical limits are exceeded should be defined by the Food Safety Team in the HACCP plan.

The HACCP team should define and document the corrective action when trends indicate a likely loss of control.

Corrections should be applied to bring the parameters controlled at the CCP under control and the correction instruction include reporting requirements and action to be taken by the authorised nominated person with regards to the products produced while the process was out of control.

59

Control Measure Validation

Product Category			
Step Number			
Hazard			
Control Measure			
Validation Methods	**Applicable**		**Comments**
	Yes	**No**	
Third Party Scientific Validation			
Historical Knowledge			
Simulated Production Conditions			
Collection of Data in normal production			
Admissible in industrial practices			
Statistical Programmes			
Mathematical Modelling			
Conclusion			
Internal Validation Required?			
If so by which method?			
CCP Confirmed			
Authorised by(Name):			
Signature:			

63

HACCP Implementation Guide Section 2.12

Validating the HACCP Plan

Before the HACCP (Food Safety) Plan can be implemented and prior to any change that may affect product safety, the HACCP Plan is validated by the HACCP (Food Safety) Team; this consists of making sure that the following elements together are capable of ensuring control of the significant hazards relevant to the food business:
Hazards
Critical Control Points
Critical Limits
Control Measures
Frequency & Type of Monitoring of CCPs
Corrective Actions
Recorded information

For existing HACCP food safety plans, validation may be possible using existing verification procedures and results

Establish Verification Procedures

Verification Planning

The Food Safety Team should define the methods, frequencies and responsibilities for verification activities. Verification activities should be put in place by the Food Safety Team to confirm the effective operation of the Food Safety Management System.

The following areas should be verified by HACCP verification audit and review of Key Performance indicators:

HACCP plan is implemented and effective
PRP(s) Infrastructure and Maintenance are implemented
Hazards are below identified acceptable levels
All other procedures required for the effective operation of the Food Safety Management system are implemented and effective
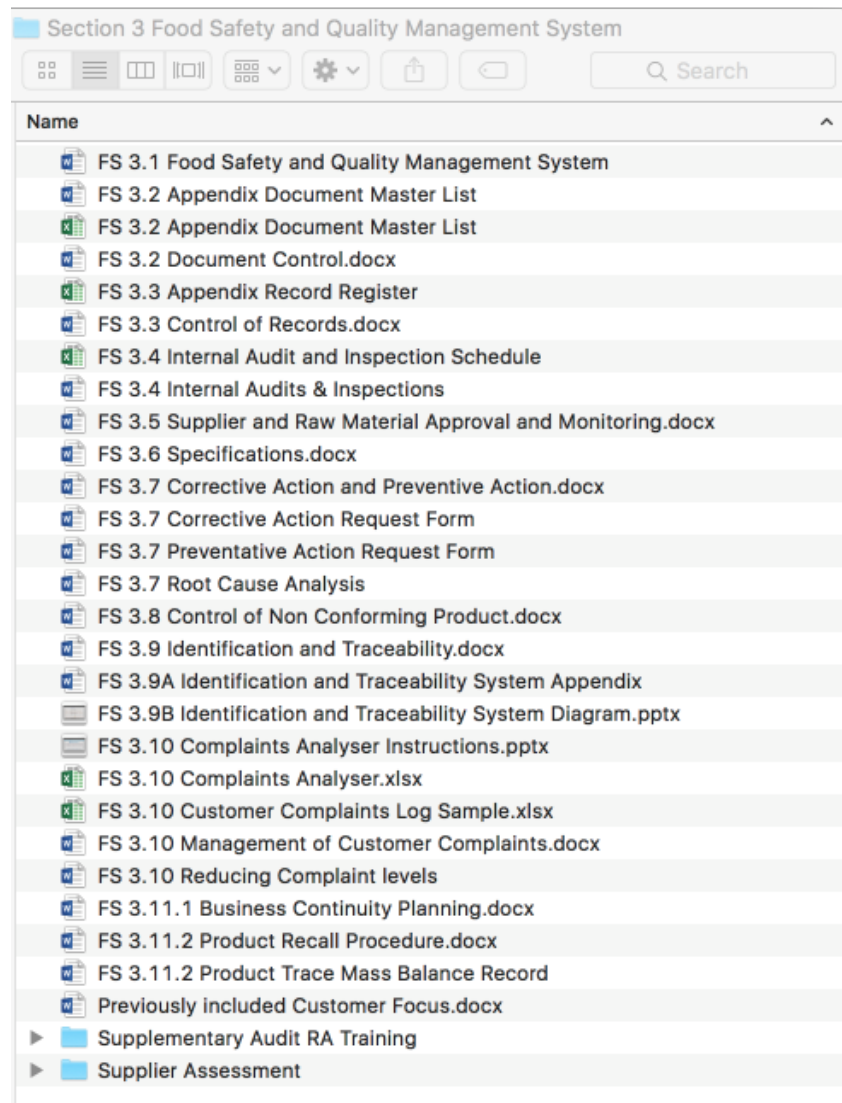
The Food Safety Representative is usually responsible for establishing an audit schedule and allocating audit responsibility.

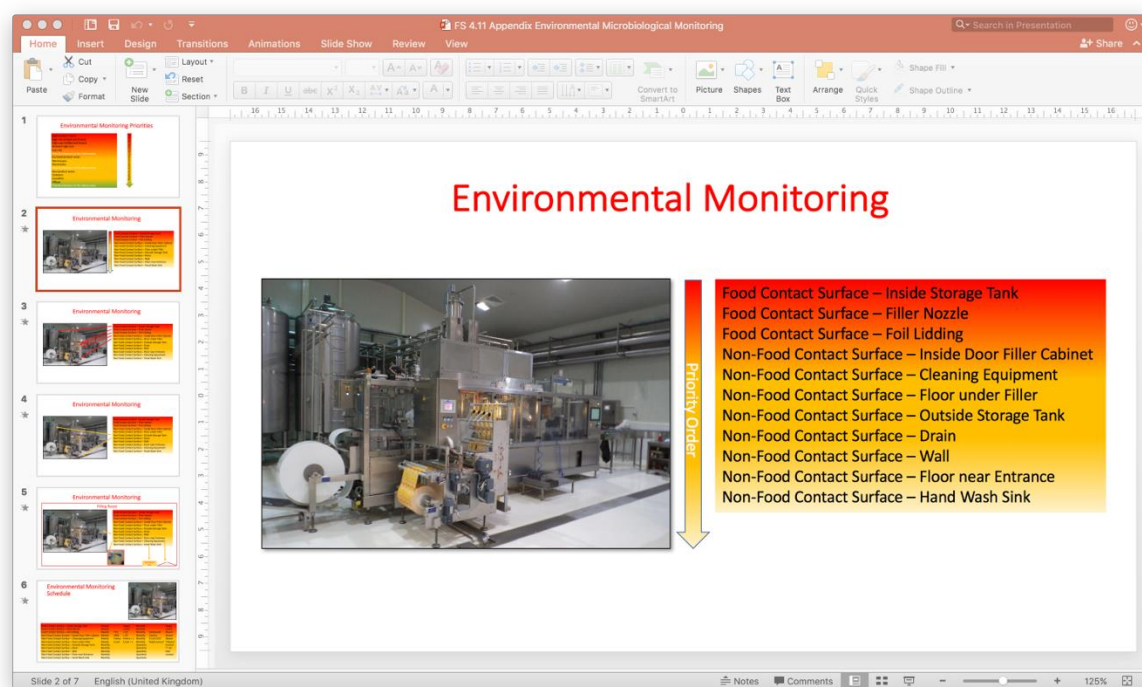**Step Four: Food Safety Quality Management System**

Our Food Safety Management System contains a comprehensive BRCGS compliant documentation package.

The Food Safety Quality Manual contains comprehensive top level procedures templates that form the foundations of your Food Safety Management System so you don't have to spend 1,000's of hours writing compliant procedures.

There are procedures that cover each clause and section of the BRCGS Global Standard for Food Safety Issue 9

Section 3 Food Safety and Quality Management System

Name
FS 3.1 Food Safety and Quality Management System
FS 3.2 Appendix Document Master List
FS 3.2 Appendix Document Master List
FS 3.2 Document Control.docx
FS 3.3 Appendix Record Register
FS 3.3 Control of Records.docx
FS 3.4 Internal Audit and Inspection Schedule
FS 3.4 Internal Audits & Inspections
FS 3.5 Supplier and Raw Material Approval and Monitoring.docx
FS 3.6 Specifications.docx
FS 3.7 Corrective Action and Preventive Action.docx
FS 3.7 Corrective Action Request Form
FS 3.7 Preventative Action Request Form
FS 3.7 Root Cause Analysis
FS 3.8 Control of Non Conforming Product.docx
FS 3.9 Identification and Traceability.docx
FS 3.9A Identification and Traceability System Appendix
FS 3.9B Identification and Traceability System Diagram.pptx
FS 3.10 Complaints Analyser Instructions.pptx
FS 3.10 Complaints Analyser.xlsx
FS 3.10 Customer Complaints Log Sample.xlsx
FS 3.10 Management of Customer Complaints.docx
FS 3.10 Reducing Complaint levels
FS 3.11.1 Business Continuity Planning.docx
FS 3.11.2 Product Recall Procedure.docx
FS 3.11.2 Product Trace Mass Balance Record
Previously included Customer Focus.docx
▶ Supplementary Audit RA Training
▶ Supplier Assessment

Food Safety and Quality Management System Implementation

Food Safety and Quality Management System Implementation Tasks are to be completed by the Food Safety Team using the Food Safety Management System templates:

Section 1 Senior management commitment

FS 1.1 Senior Management Commitment
FS 1.1.1 Food Safety and Quality Policy
FS 1.1.2 Food Safety Culture
FS 1.1.2 Food Safety Culture Planning
FS 1.1.3 Food Safety and Quality Objectives
FS 1.1.4 Senior Management Review
FS 1.1.4 Appendix Senior Management Review Record
FS 1.1.5 Management Meetings
FS 1.1.6 Appendix Integrity Helpline
FS 1.1.6 Confidential Reporting System
FS 1.1.7 Human and Financial Resources
FS 1.2 Responsibility and Authority
FS 1.2 Appendix Example Organisational Chart
FS 1.2 Responsibility Appendix Example Job Descriptions
FS 1.2A Communication

Section 2 The food safety plan – HACCP

FS 2 HACCP System
FS 2.1.1 HACCP Team
FS 2.1.2 HACCP Scope
FS 2.2 HACCP Prerequisites
FS 2.3 HACCP Product Description and Relevant Information
FS 2.4 HACCP Intended Use
FS 2.5 HACCP Flow Diagrams
FS 2.6 HACCP Flow Diagram Verification
FS 2.7.1 Hazard Identification
FS 2.7.2 Hazard Assessment
FS 2.7.3 Identification of Control Measures
FS 2.8 Identification of Critical Control Points (CCPs)
FS 2.9 Establishing Validated Critical Limits for each CCP
FS 2.10 Establishing a Monitoring System for each CCP
FS 2.11 Establishing a Corrective Action Plan

Section 8 Production Risk Zones

FS 8 Production Risk Zones High Risk, High Care and Ambient High Care Production Risk Zones

Section 9 Requirements for Traded Products
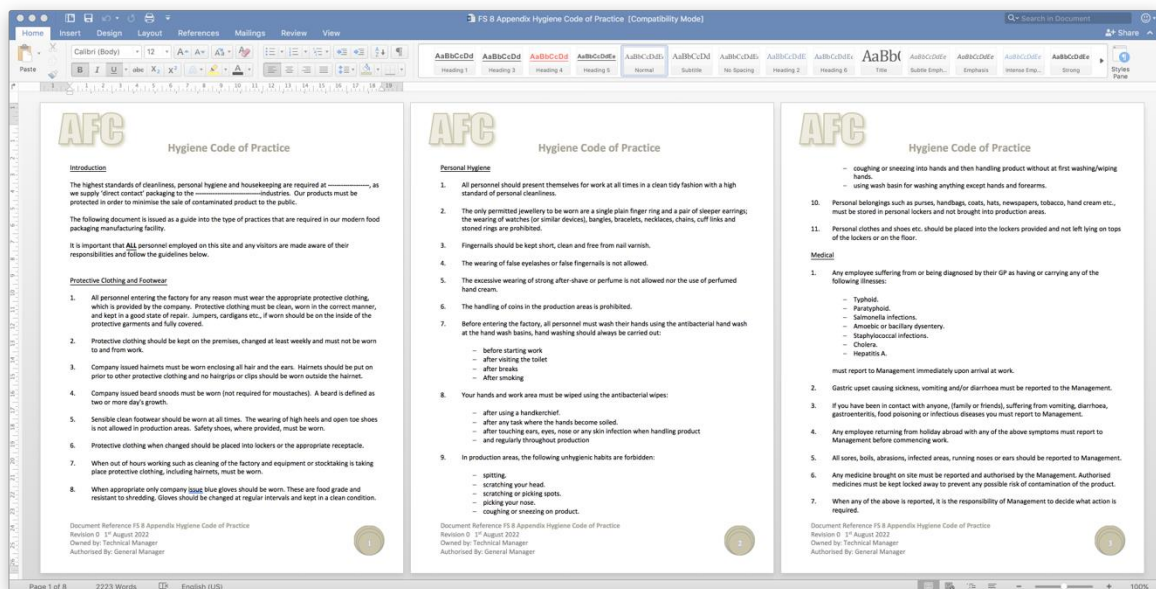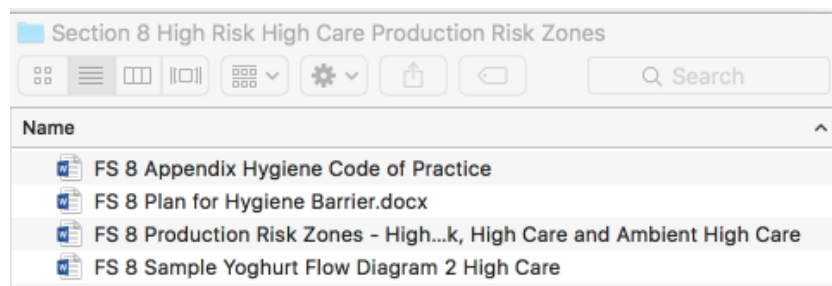
FS 9.1 The Food Safety Plan - HACCP
FS 9.2 Approval and Performance Monitoring of Manufacturers/Packers of Traded Food Products
FS 9.3 Specifications
FS 9.4 Product Inspection and Laboratory Testing
FS 9.5 Product Legality
FS 9.6 Traceability

Step Five: Training and Implementation

A significant part of the implementation process is training. Job Descriptions should be available for all staff and they should be briefed and aware of their food safety responsibilities.

A training matrix and plans should be drawn up for all staff and the relevant training given based on responsibility and authority.

We have provided a Staff Training Matrix Template in Microsoft Excel Format.

For each employee and individual training record should be completed. QMR 002 Training Record is provided in the documentation pack as a template.

Basic Training should be given to all staff and also include:

- ✓ Job/Task Performance
- ✓ Company Safety and Quality Policies and Procedures
- ✓ Good Manufacturing Practices
- ✓ Allergen Controls
- ✓ Cleaning Procedures
- ✓ HACCP
- ✓ Bio security and Food Defence
- ✓ Product Quality
- ✓ Chemical Control
- ✓ Hazard Communication
- ✓ Blood borne Pathogen
- ✓ Emergency Preparedness
- ✓ Employee Safety
- ✓ Safety Regulatory Requirements/Quality Regulatory Requirements

The Food Safety Team should receive extra training:

- ✓ Internal Audit Training (Conducted in Step Seven)
- ✓ HACCP Training

Remember all food handlers should receive Basic Food Hygiene Training

Implementation

At this stage of the project you will need to ensure:

- ✓ Steering Group are established and briefed
- ✓ The Steering Group take control of the Project Plan established by Senior Management

| Food Safety Management System Steering Group			
FSQMS Team Member	**Name**	**Position**	**Qualification**
FSQMS Team Leader			
FSQMS Assistant Leader			
FSQMS Team Members			

Project Plan

The Steering Group use the Excel Project Plan developed by Senior Management as a step by step guide to implementing the Food Safety Management System.

		Weeks	01-Jan	08-Jan	15-Jan	22-Jan	29-Jan	05-Feb	12-Feb	19-Feb	26-Feb	05-Mar	12-Mar	19-Mar

Legend: Plan/Document (blue), Implement (grey), Maintain (green)

		Weeks	01-Jan	08-Jan	15-Jan	22-Jan	29-Jan	05-Feb	12-Feb	19-Feb	26-Feb	05-Mar	12-Mar	19-Mar
Section 1 Senior Management Commitment														
Fundamental requirement - Senior management need to demonstrate they are fully committed to the implementation of the food safety and quality management system, meeting the requirements of the Global Standard for Food Safety and														
1.1	Senior Management Commitment And Continual Improvement													
1.1.1	Documented Food Safety Policy													
1.1.2	Documented Food Safety Objectives	1		▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
1.1.3	Management Review	1		▓	▓	▓	▓	▓	▓	▓	▓	▓	▓	▓
1.1.4	Meeting Program													
1.1.5	Human And Financial Resources													
1.1.6	Informed Of All Relevant Legislative, Scientific													
1.1.7	Current, Original Copy Of The Standard													
1.1.8	Announced recertification audits													
1.1.9	Attendance most senior production or operations manager													
1.1.10	Non- Conformities Identified At Previous Audit addressed													
1.2	Organisational Structure, Responsibilities And Management Authority													
1.2.1	Organisation Chart													
1.2.2	Employees Are Aware Of Responsibilities													
Section 2 The Food Safety Plan – HACCP														
Fundamental requirement - There must be an implemented and effective Food Safety Plan based on														
2.1	The HACCP Food Safety Team													
2.1.1	Multi-disciplinary food safety team													
2.2	Pre- requisite programs													
2.2.1	Cleaning and sanitising													
	Pest control													
	Maintenance programs for equipment and buildings													
	Personal hygiene requirements													
	Staff training													
	Purchasing													
	Transportation arrangements													
	Processes to prevent cross contamination													
	Allergen controls													
2.3	Describe the Product													

79

Step Six: Internal Auditing Training

Internal Auditor Training - An interactive and illustrated Internal Audit training presentation to train your Internal Audit procedure.
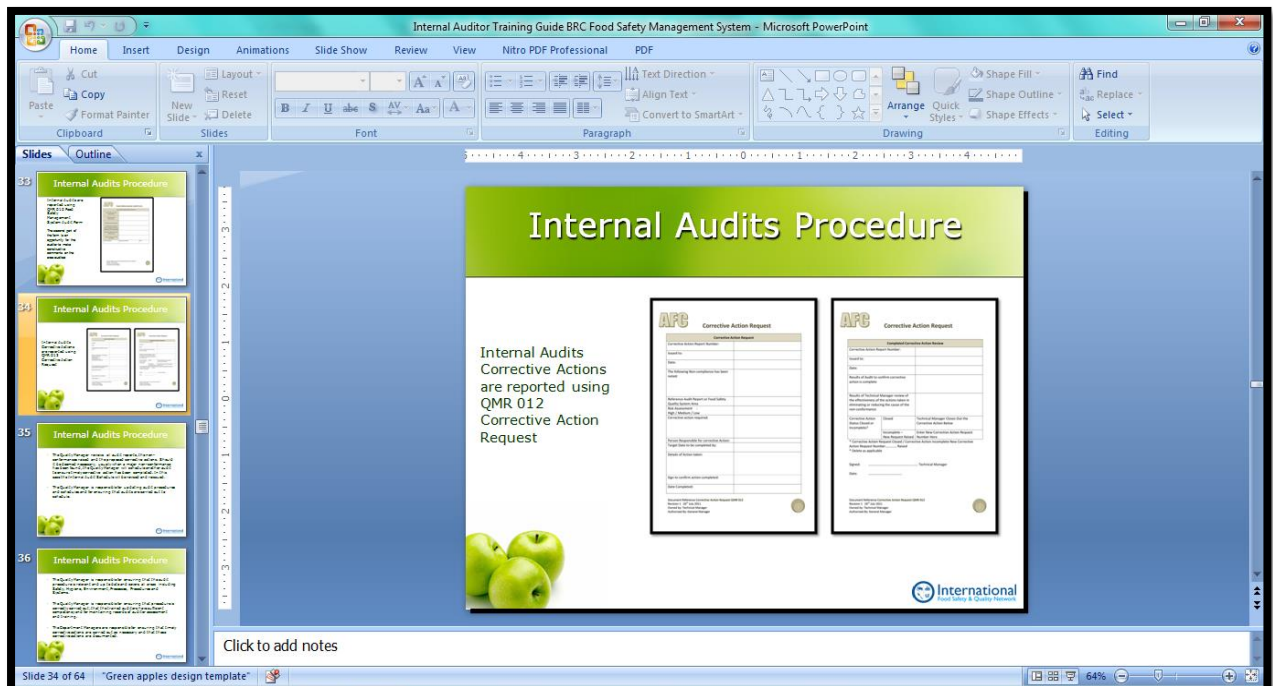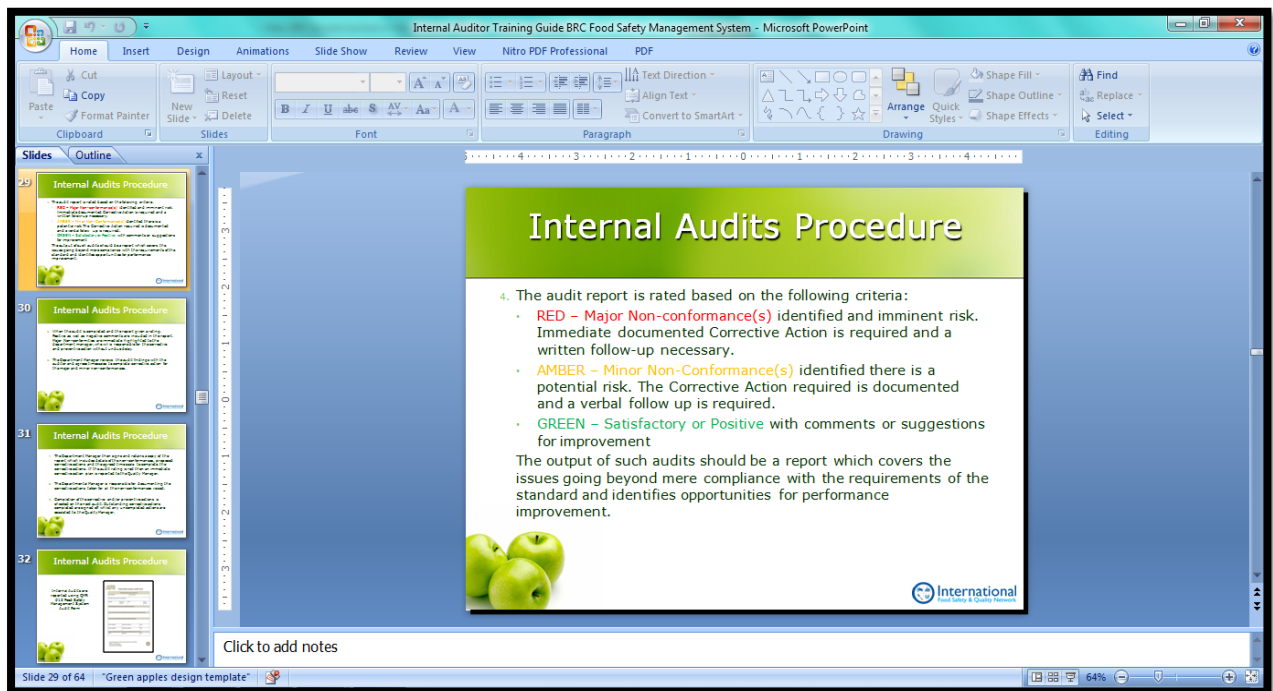
Stage Seven: Final Steps to BRCGS Certification

There a few final steps to achieving BRCGS Certification:

- ✓ Carry out a Senior Management Review
- ✓ Carry out an assessment of your system to make sure that it meets the requirements of the BRCGS Global Standard for Food Safety using our Checklist and a copy of the standard
- ✓ Ensure any areas requiring corrective action are addressed
- ✓ Choose your Certification Body
- ✓ Agree a Contract with a Certification Body
- ✓ On-Site Audit
- ✓ Audit & Corrective Action Review
- ✓ Certification & Issuing of the Audit Report
- ✓ Celebrate!
- ✓ Communicate your success!

Our system is supplied with QM 1.2 Management Review Procedure and QMR 001 Management Review Meeting Minutes which should be used as a template.

Senior Management Review Meeting Notification

Date/Time

Venue

Agenda

1. Review of the Food Safety and Quality Policy
2. Review of the Food Safety and Quality Objectives*
3. Review of Management Changes
4. Minutes and Follow-up actions and timescales from previous review meetings
5. Food Safety Culture performance review
6. Outstanding Non-conformances as a result of internal and external audits
7. Results of external second and third-party audits
8. Trend analysis of Customer and Supplier complaints
9. Analysis of the results of verification activities including internal audits, GMP and HACCP plan verification audits
10. Food Safety and Quality Key Performance Indicators Review and trend analysis
11. Emergencies and Accidents
12. Process performance and product conformity
13. Corrective and preventive action status
14. Food Safety incidents including allergen control and labelling non-conformances, recalls, withdrawals, safety or legal issues
15. Review of HACCP systems
16. Review of changes which could affect food safety and the HACCP Plan (including legislation changes and food safety related scientific information)
17. Review of food defence measures
18. Review of ingredient and product authenticity
19. Communication activities and effectiveness of communication
20. Review of Resources and effectiveness of Training
21. Recommended improvements
22. Customer Feedback and Sales levels are reviewed to give an indication of trends
23. A.O.B

Senior Management Review Record

Management Review Meeting - Date xx month YEAR

Meeting Objective

To review and assess the effectiveness of the Food Safety Quality Management System and to formulate action plans for improvement.

Attendees
Managing Director - Name
General Manager - Name
Operations Manager - Name
Engineering Manager - Name
Supply Chain Manager - Name
Distribution Manager - Name
Technical Manager - Name

Review Inputs		
Item on Agenda	Performance, Review Comments & Details	Details of Action Required
Review of the Food Safety and Quality Policy	-	-
Review of the Food Safety and Quality Objectives*	-	-
Review of Management Changes	-	-
Review of site food safety culture development plan performance	-	-
Minutes and Follow-up actions and timescales from previous review meetings	-	-
Outstanding Non-conformances as a result of internal and external audits	-	-
Results of external second and third-party audits	-	-
Trend analysis of Customer and Supplier complaints	-	-

Document Reference FS 1.1.4 Appendix Senior Management Review Record
Revision 1 1st August 2022
Owned by: General Manager
Authorised By: Managing Director

The senior management team implement actions to continually improve the FSQMS

Senior Management should implement actions to improve the Food Safety Management System. This will normally be as outputs from the Management Review:

Self-Assessment

A final assessment should be made by the most senior technical member of the management team to decide if the Site Food Safety Management System in its current form meets the Requirements in Sections 1 to 9 of the BRCGS Standard. The nominated manager should read through the requirements in Section 1 to 9 of the BRCGS Global Standard for Food Safety and assess for compliance using the checklist below to record their findings.

BRCGS Global Standard for Food Safety F804a: Issue 9 Auditor Checklist and Site Self-Assessment Tool can be used for this task and can be downloaded here: https://BRCGSglobalstandards.com/media/1055370/f804a-issue-8-checklist-english.docx

Findings can be summarised below.

BRCGS Global Standard for Food Safety Issue 9 Gap Analysis			
Relevant Documentation Requirements	**Compliant**		**Comments**
Section 1 Senior Management Commitment	**Yes**	**No**	
1.1 Senior management commitment and continual improvement			
1.2 Organisational structure, responsibilities and management authority			
Relevant Documentation Requirements	**Compliant**		**Comments**
Section 2 The Food Safety Plan – HACCP	**Yes**	**No**	

93

Ensure any areas requiring corrective action are addressed

The non-compliances identified in the assessment of compliance with the BRCGS Standard should be logged by the Food Safety Team Leader and the appropriate corrective action allocated and taken:

Date	BRCGS Section	Details of Non-Conformance	Identified by:	Corrective Action Required	Responsibility	Target completion Date	Date Completed

101