BRC Storage and Distribution
from issue 2 to issue 3 – what are the main changes

Audit and certification consequences

Issue 3 was published in August 2016, and the requirements are an evolution from previous issues.

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.

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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.

From February 1st, 2017 all BRC S&D audits will be conducted against Issue 3. Certificates issued against Issue 2 will remain valid for the duration indicated on the certificate.

This document lists a summary of the main changes and the impact on you as a certificate holder. Please be aware that this is a summary and not an exhaustive list of all the requirements of the Standard.

The new standard is available from BRC (http://www.brcglobalstandards.com/) and is free downloadable if you have a BRC-Participate subscription or a valid S&D certificate.

Changes - General

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).

Changes to protocol

Audit grading

To encourage differentiation and improvement, the audit grades are different from issue 2:

AA grade 5 or less minor NCs
A grade 6-10 minor NCs
B grade
11-16 minor NCs
1 major and 10 or less minors
C grade
17-24 minor NCs
1 major and 11-16 minor NCs
2 major and 10 or less minors
D grade
25-30 minor NCs
1 major and 17-24 minor NCs
2 major and 11-16 minor NCs

AA, A and B grade result in a 1 year audit frequency, C and D grade in a 6 month audit frequency.

Companies that handle consumer products only may receive an audit frequency of 18 months.

Optional Unannounced audits
This feature was already present under version 2. There are two options:
Option 1 – full unannounced
Option 2 – part announced, part unannounced
The + symbol will be added to the audit grade (e.g. A+).

NOT new but re-emphasized: Scope / exclusions from scope
Exclusions can only be approved by exception. Sites with exclusions on the certificate are not allowed to use the BRC logo.

Changes to the Audit Requirements
This chapter lists a summary the main changes, it is not an exhaustive list of all changes. BRC will issue a document “Guide to key Changes” soon. This document will be available on BRC Participate.

1. Clause coding
makes more clear where the specific clause may be excluded e.g. exclusion of warehouse related clauses for transport-only companies. Clauses are followed by:
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

A new clause is added (3.5.1.1) to provide a more robust risk assessment for service providers

Chapter 5 Vehicle operating standards
Two new clauses added
(5.3.4) to emphasize hygiene and cleanliness of loading area
(5.2.1) to address risks while in transit

Chapter 6 Facility Management
6.5 Waste and waste disposal: 2 new clauses introduced (6.5.5 and 6.5.6) to reflect the increased donation of surplus foods to charities.
6.6 Pest control: new clause added to make sure infestation is effectively controlled

Chapter 10 – Wholesale Module
BRC considers a wholesaler as a food handler which involves more than storage/distribution. Following changes have been made to reflect the additional activities, the additional clauses are similar to those in BRC Food.
10.1: Wholesale module. Clauses for supplier approval procedure (10.1.1; 10.1.2) added. These clauses align the S&D standard with other BRC standards (e.g. BRC food).
10.2 Product authenticity is now addressed similar to BRC Food.
10.5 Traceability (new) to have greater emphasis and more transparency in the supply chain (new clauses similar to Food)
10.6 Product Inspection and analysis greater emphasis on claims made on the packaging (as in BRC Food)
10.7 Management of product withdrawal and recall (new) to highlight and clarify the role of wholesalers

Chapter 13 Contract Packing Module
New clauses to put greater focus on label application and the allocation of packaging materials in the packaging area. This should reduce the opportunity for errors as these areas are among the major reasons for recalls.
For more information contact your local ISACert office or check our website http://www.isacert.com/ for an ISACert office near to you.