The Global Food Safety Initiative (GFSI) was developed by a collection of retailers and manufacturers who were looking to establish minimum standards for food safety, regardless of geographic location. GFSI does not have any audits of its own, rather, it has established a benchmarking document, against which “scheme-owners” submit their audit schemes for approval.

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EXAMINING THE BRC AND SQF CERTIFICATION PROCESS for the Transportation and Storage Industry

BY STEPHANIE LOPEZ, AIB INTERNATIONAL

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Food Safety

SQF and BRC are two of the schemes that are benchmarked for food processing. The audits for storage and distribution have been submitted and are currently in the benchmarking process. Many food manufacturers that are already certified to a scheme, such as BRC and SQF, are requiring that their suppliers, including third-party logistic providers, meet equivalent criteria.

GFSI-benchmarked audits are different than typical GMP inspections. With GFSI, the burden of proof is on the facility. In most GMP audits, you begin with a score of 100% until the auditor finds a non-conformance, at which time your score decreases. It is the opposite for GFSI. You begin with zero points when the auditor arrives, and you must provide evidence that you are complying with each clause of the standards to earn points. Companies must comply 100% to become certified, so any non-conformances must be corrected before proceeding.

Another significant difference between the GMP- and GFSI-audit process is the focus on quality systems. While a GFSI-approved audit will involve some physical inspection, the emphasis is on the food safety management system and the associated documentation. The certification endorses your programs for a full year, so the programs provide evidence that the good practices that are observed during the audit will continue and be sustained.

GFSI auditors are required to be completely independent of the facility being audited. For this reason, they are not allowed to give any advice on how to resolve non-conformances.

BRC STANDARD
Some of the BRC requirements are basic and likely already in place, while others (such as management commitment and quality management system) may introduce new requirements. Management commitment includes specific requirements for documented management team meetings.

The quality management system includes elements, such as document control, where every policy, procedure, form, and record needs to be controlled. Use of obsolete documents will lead to a non-conformance.

BRC also requires that facilities demonstrate that employees have been trained to complete each activity for which they are responsible. For example, if any employee is required to sweep the warehouse or inspect a vehicle, effective training will need to be demonstrated.

Sections covered in the BRC Storage and
Distribution Audit include:
• Senior management commitment.
• Hazard and risk analysis.
• Quality management system.
• Site and building standards.
• Vehicle operating standards.
• Facility management.
• Good operating practices.
• Personnel.

The BRC audit format covers documentation and facility inspection and typically lasts a day and a half to two days, depending on the size and complexity of operation.

There is no special score for certified operations; just pass/fail or certified/not certified. The frequency of reaudits is dependent on the number and severity of non-conformances. With a minimal number of non-conformances, the audit cycle is every 18 months after one year of certification. If there are reasons for concern, the frequency is 12 months.

BRC has a unique standard for storage and distribution that is separate from the standard for food auditing. Operations that meet one of the following criteria are not eligible for the BRC storage and distribution audit.

• Warehouses that are within 50 kilometers (about 31 miles) of manufacturing sites and under the same ownership.
  – In these instances, the warehouses are typically included in the manufacturing-site audit.
• Facilities that handle bulk agricultural products, such as a grain elevator.
• Facilities that remove product from its original container for sorting or repacking.
  – This is more aligned with manufacturing.
• Rail and boat bulk transport.
  – The audit currently only applies to bulk transport by road.

SQF CODE
One of the unique features of SQF is that the audit is offered at three levels.

• **Level 1** covers prerequisite programs. It does not meet GFSI requirements because it doesn’t include a food safety plan, but it can be used as stepping stone to the next levels.

• **Level 2** covers food safety and food legality (or regulatory compliance).

• **Level 3** also covers food safety and food legality, but adds the component of food quality.

For example, if you store chocolate in a hot warehouse and it melts, it would not be included in a Level 2 audit. However, it may be covered by a Level 3 audit.

Many companies opt to start with a Level 2 certification, then after a year or two advance to Level 3.

SQF uses the same code for food manufacturing and warehouse audits. However, only the modules specific to your operation are covered. A common theme to the various modules is an emphasis on verification and validation.

All audits include Module 2, which is the systems module.

**Module 2 – Systems Module**

• Management commitment.
• Document control and records.
• Specifications and product development.
• Attaining food safety (HACCP).
• System verification.
• Product identification, trace, withdrawal, recall.
• Site security.
• Identity preserved foods (Level 3).
• Training.

Just as with BRC, there is large emphasis on the food safety management system, including management commitment, document control, and training.

In addition to module 2, warehouses and logistics companies would be audited under module 12, which covers the prerequisite programs, or GMPs, specific to transportation and distribution.

**Module 12 – GMPs for Transport/Distribution**

• Site requirements.
• Construction/Control of storage areas.
• Personnel hygiene/welfare.
• Personnel processing practices.
• Storage and transport.
• Control of foreign matter.
• Waste disposal.
• Exterior.

Warehouses and transport companies associated with a manufacturing site may choose to have a separate audit or add it to the manufacturing-site audit. The stand-alone transport/distribution audit is usually a one-time audit for the first two years. It is expected that GFSI will complete the benchmarking process for these schemes in the near future. It is also expected that there will be a big push from manufacturers and retailers for their logistics suppliers to get certified.

One of the nice features of this format is that if non-conformances are identified during the desktop audit and they are correct before the facility audit, then they do not count toward the final score.

SQF has a tiered scoring system. The highest rating, based on the least number and low severity non-conformances is Excellent. This is followed by Good and Comply. And as Comply suggests, it is meeting the requirements, but not necessarily exceeding them. Facilities that receive Excellent or Good scores go into an annual audit cycle. Facilities that receive a Comply score will need to undergo a surveillance audit at the six-month point.

Just as with BRC, all non-conformances need to be closed out to achieve certification. Major non-conformances must be closed within 14 calendar days, and minor non-conformances must be closed within 30 days. This includes providing evidence to the auditor of corrective action and preventive action.

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The author is Vice President of Food Safety Education, AIB.
FS•360 Food Safety Evaluation

The FS•360 can be used in a free-standing manner or complementary to our other audits. This extends the scope of the AIB Consolidated Standards to really challenge your GMPs.

FS•360 is an educational, non-scored probe of on-the-floor food safety practices that offers recommendations to eliminate issues while remaining true to AIB’s core principles.

FS•360 is derived from the core elements of the AIB Consolidated Standards for Inspection. It is guided by two critical sections of the Food, Drug, and Cosmetic Act of 1938:

• Section 402 (a)(3) specifies that food has been manufactured under such conditions that it is unfit for consumption.
• Section 402 (a)(4) considers that food may be adulterated if it is prepared, packed, or held under insanitary conditions whereby it may have become contaminated with filth or rendered injurious to health.

FS•360 is intended to be consultative and educational in nature. However, the extent to which the focus is on consultation, or education, or some other purpose, can also be specified by the client. The evaluation could include third shift inspections, downtime inspections (including weekends), or focus on specific areas of the facility only... the options are endless.

Questions about Food Safety?

AIB can answer and offer support with the following:

• G MP Inspections
• G FSI Certification
• BRC
• FSSC 22000
• SQF

800-633-5137 • www.aibonline.org