

BRCGS Food Safety Issue 9:

New Advancements in Food Safety Regulations

Focus on chapter 4.11



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Overview

The release of BRCGS Food Safety Issue 9 on 1 August 2022 introduces significant advancements in the realm of food safety requirements. This update places particular emphasis on food safety culture, validation and verification processes, training and competence standards, and the audit protocol. Version 9 accentuates the improvement of food safety culture within organizations, necessitates the validation of changes prior to implementation, extends training obligations to encompass all staff members, and introduces a novel audit option called the "blended audit."

1. Food Safety Culture Implementation:

Version 9 underscores the paramount importance of food safety culture at the highest levels of management. It mandates clear commitments and activities aimed at improving the food safety culture within an organization.

2. Validation and Verification:

In the future, changes within food safety processes must undergo validation prior to implementation. Notably, the HACCP area is now subject to additional validation requirements, including the validation of control points and critical limits. Verification activities are no longer limited to an annual occurrence but should transpire at least once per year and promptly following any alterations or incidents.

4. Audit Protocol:

The "blended audit" option is new. This method encompasses two parts—an announced remote audit and an on-site audit. Unannounced audits have been scaled back, while the requirement for an announced audit remains obligatory every three years.

3. Training and Competence:

Training requirements dictate that all personnel undergo training programs. The identification of training needs and the formulation of a plan to improve food safety and quality culture are now mandatory across the entire workforce. Specifically, the VACCP [Vulnerability Analysis Critical Control Point] and TACCP [Threat Assessment Critical Control Point] teams must possess comprehensive knowledge concerning food fraud and food defense principles.



Focusing on Chapter 4.11 Housekeeping and Hygiene

The maintenance of proper hygiene standards through effective housekeeping and cleaning systems is important. These systems are essential to minimize the risk of product contamination and ensure hygiene is upheld consistently.

4.11.1

It is necessary to maintain the premises and equipment in a clean and hygienic condition. This requirement ensures that proper sanitation practices are implemented to prevent the accumulation of dirt, debris, and contaminants that may pose a risk to food safety. By maintaining cleanliness and hygiene, the likelihood of product contamination is reduced, promoting a safe and sanitary environment for food production and processing.



4.11.2

It is required the establishment and maintenance of documented cleaning and disinfection procedures for the building, plant, and all equipment. Specifically, cleaning procedures for processing equipment and food contact surfaces must be implemented. The frequency and methods of cleaning should be determined based on risk assessment. These procedures are crucial for achieving appropriate standards of

cleanliness, ensuring that potential contaminants are effectively removed, and minimizing the risk of product contamination.



4.11.3

The importance of defining acceptable and unacceptable cleaning performance is highlighted. Specifically, these limits should be established for food contact surfaces and processing equipment, considering potential hazards related to the product or processing area, such as microbiological, allergen, foreign body, or product-to-product contamination.

Acceptable levels of cleaning can be determined based on various methods, including visual appearance, ATP bioluminescence techniques, microbiological testing, allergen testing, or chemical testing, depending on the specific requirements. If monitored results fall outside of the acceptable limits, the site must define and implement corrective actions to address the situation effectively.

In cases where cleaning procedures are part of a prerequisite plan to control specific hazards, it is crucial to validate the cleaning and disinfection procedures and establish their frequency. Records of these validations should be maintained. This also includes considering the risk associated with cleaning chemical residues on food contact surfaces.

By establishing clear limits for cleaning performance and implementing appropriate corrective actions, food facilities can effectively control and mitigate potential risks related to contamination, ensuring the safety and quality of their products.

4.11.4

Adequate resources for cleaning purposes must be available, in situations where equipment dismantling or accessing large equipment is necessary for cleaning, appropriate scheduling should be followed, preferably during non-production periods. If access to equipment is required for cleaning, cleaning staff should be adequately trained, or engineering support should be provided to ensure the task is performed effectively and safely. This requirement ensures that the necessary arrangements are made to facilitate thorough cleaning and maintenance without disrupting production processes or compromising food safety standards.

4.11.5

The cleanliness of equipment must be assessed before it is reintroduced into production. This assessment involves conducting checks on cleaning effectiveness, which may include visual inspections,

analytical tests, and microbiological analyses. The results of these checks should be recorded and documented. The purpose of recording these results is to identify trends in cleaning performance over time and to initiate necessary improvements when required.

By monitoring and documenting the cleanliness checks, food facilities can track the effectiveness of their cleaning processes and identify any areas that may require attention or enhancements. This proactive approach ensures that equipment is thoroughly cleaned, minimizing the risk of cross-contamination, and maintaining high standards of food safety and quality.



4.11.6

Requirements for cleaning equipment must include:

1. Hygienic Design and Fitness for Purpose: Cleaning equipment used in food facilities should be designed in a way that promotes hygiene and be suitable for the intended purpose. This ensures that the equipment itself does not become a source of contamination and facilitates effective cleaning procedures.
2. Suitable Identification: Cleaning equipment should be appropriately identified to indicate its intended use.

Clear identification helps prevent cross-contamination by ensuring that equipment is used only for designated cleaning tasks.

3. Hygienic Cleaning and Storage: Cleaning equipment must be cleaned and stored in a hygienic manner to prevent contamination. Thorough cleaning practices, including proper sanitation and drying, are essential to maintain cleanliness.

By ensuring that cleaning equipment is hygienically designed, clearly identified, and properly cleaned and stored, food facilities can minimize the risk of cross-contamination during cleaning activities and maintain high standards of hygiene and food safety.

4.11.7

Specific requirements apply to Clean-in-Place (CIP) equipment to ensure effective operation and control of hazards. These requirements include:

1. Design and Construction: All CIP equipment must be designed and constructed in a manner that enables effective cleaning. This ensures that the cleaning process adequately eliminates potential sources of contamination.
2. Performance Limits and Validation: Limits for key process parameters, such as temperature, time, flow rate, and concentration of cleaning agents, shall be established to define acceptable and unacceptable performance. Validation procedures must be conducted to confirm the effectiveness of the CIP equipment in meeting these performance limits.

3. Maintenance and Staff Training: CIP equipment should be properly maintained by adequately trained personnel. Staff responsible for operating and maintaining the CIP equipment should receive appropriate training to perform their tasks competently.

4. Monitoring and Action: If CIP facilities are used, a defined frequency of monitoring should be established based on risk. This monitoring aims to assess the effectiveness of the CIP process and ensure it remains within the defined limits. Procedures should be in place to outline the actions to be taken if monitoring indicates that the cleaning process deviates from the defined limits.

By adhering to these requirements, food facilities can ensure the proper design, validation, maintenance, monitoring, and control of CIP equipment, contributing to effective cleaning operations and the mitigation of potential hazards.

4.11.8

A risk-based environmental monitoring program is required to control the presence of relevant pathogens or spoilage organisms within the production areas. The program should be designed based on risk considerations and, at a minimum, include the following elements:

1. Sampling Procedures: Clearly defined procedures should be established for collecting environmental samples to ensure consistency and accuracy throughout the monitoring process.
2. Sample Locations: The identification of appropriate sample locations within the production areas is essential. These locations should be

strategically chosen to capture representative samples and areas of potential contamination.

3. **Frequency of Tests:** The frequency at which environmental tests are conducted should be determined based on risk. Higher-risk areas or processes may require more frequent testing to ensure timely detection of potential issues.
4. **Target Organisms:** The environmental monitoring program should specify the target organisms of concern, which can include pathogens, spoilage organisms, and indicator organisms. The selection of target organisms should align with the specific risks associated with the facility and its products.
5. **Test Methods:** The program should outline the test methods to be used for environmental monitoring, such as settle plates, rapid testing, or swabbing. These methods should be suitable for detecting the target organisms effectively.
6. **Recording and Evaluation of Results:** Clear procedures should be established for recording and evaluating the results of

environmental monitoring tests. This includes documenting positive or negative results and analyzing trends over time.

The environmental monitoring program, along with its associated procedures, should be documented to ensure clarity, consistency, and traceability. Appropriate control or action limits should be defined to determine acceptable levels of contamination and trigger corrective actions when necessary.

The company must also establish documented procedures for taking corrective action when monitored results indicate a failure to meet control limits or when positive results show an upward trend. Regular review of the environmental monitoring program is required, at least annually, and in response to specific circumstances, such as changes in processing conditions, new scientific information, product failures, or consistently negative results. This review ensures the effectiveness and relevance of the program in identifying and managing environmental risks within the facility.

Conclusion:

The introduction of BRCGS Food Safety Issue 9 brings forth crucial updates in various aspects of food safety requirements. With a focus on food safety culture, validation and verification, training and competence, and the audit protocol, these advancements aim to enhance overall food safety practices. By emphasizing the importance of food safety culture, validating changes before implementation, expanding training requirements, and introducing a blended audit option, organizations can strive towards improved food safety practices and mitigate the risk of incidents.



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