



BRC Global Food Safety Standard – Issue 6

Summary of changes

Issue 6	Issue 5 reference	Summary of Changes (wording may not be verbatim from Issue 6)
★ 1.1 SOI	Unchanged	Company's Senior Management shall demonstrate they are fully committed to processes which facilitate continual improvement of food safety and quality management.
1.1.1	Moved from 3.1.1	Food Safety and Quality Policy must be signed by the person with the overall responsibility for the site. Reference to signed food safety and quality policy was previously included in 3.1 Statement of Intent.
1.1.2	Previously 1.3	<ul style="list-style-type: none"> Objectives must be targets or clear measures of success and Results reported quarterly to site senior management.
1.1.3	Previously 1.6	Management review meetings: <ul style="list-style-type: none"> Attended by senior management Performance reviewed against the Standard and objectives from 1.1.1 Evaluate previous management review action plans and time frames Evaluate customer complaints Records of meetings documented and used to revise the objectives
1.1.4	New	Monthly meetings to bring food safety, legality and quality issues to the attention of senior management and allow for resolution of issues requiring immediate action.
1.1.5	Previously 1.1	Resources required to comply with this Standard. Reference to food safety plan changed to 'HACCP based food safety plan'.
1.1.6	Moved from 3.3.5	No significant change to wording.
1.1.7	Previously 1.10	Company must have a 'genuine hard copy' or 'electronic version' of the current Standard available.
1.1.8	Previously 1.11	'Announced' recertification audits shall occur or before audit due date versus 'certification does not expire'.
1.1.9	Previously 1.12	Relevant department managers or their deputies shall be available during the audit process.
1.1.10	Previously 1.13	'Root cause' of nonconformities identified at the previous audit against the Standard have been effectively addressed to prevent recurrence.
1.2 SOI	Previously in 3.3 SI and 1.0	Organization structure was in 3.3 SI. Lines of communication was in 2 nd sentence of 1.0 SI.



1.2.1	Previously in 3.3.1, 3.3.2, 3.3.3	Responsibilities for food safety, legality, and quality shall be allocated and understood by the managers responsible . 'Deputies' shall be documented versus 'arrangements in place to cover for the absence of key staff'.
1.2.2	Previously 3.3.4	Employees are aware of their responsibilities. Employees shall be able to demonstrate that work is carried out in accordance with documented work instructions.

★ 2.0 SOI		Removed 'reference shall be made to relevant legislation, codes of practice or guidelines.'
2.2.1	Added 2.1.2 and 2.1.3	Team members shall have specific knowledge of HACCP and relevant knowledge of the product, process, and associated hazards.
2.2.2	New	Pre-requisite programs added. Control measures and monitoring procedures for pre-requisite programs must be documented and shall be included within the development and reviews of the HACCP program .

2.3.1	Previously 2.2.3	<ul style="list-style-type: none"> The scope of each HACCP plan including products and processes covered shall be defined. Allergens shall be included in composition of product description. Description shall include potential for known customer misuse.
2.3.2	Previously 2.2.2	Information for the hazard analysis shall include food safety legislation relevant for the production and sale .
	Previously 2.2.1	Removed reference to who is responsible for defining product description.

2.4.1	Previously 2.3.1	No change in wording.
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2.5.1	Previously 2.4.1	Flow diagram must start with raw material receipt versus selection. List of required diagram elements changed from 'may' to 'shall'. Added reference to high care / high risk segregation.
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2.6.1	Previously 2.5.1	Flow diagrams shall be verified at least annually.
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2.7.1	Previously 2.6.1	Removed the requirement to 'confirm the scope'.
2.7.2	Previously 2.6.2	Removed potential for adulteration and /or deliberate contamination. Where elimination of the hazard is not practical, justification for acceptable levels of the hazard in the finished product shall be determined.



2.7.3	Previously 2.6.3	Where control is achieved through existing pre-requisite programs, adequacy of the program to control the hazard shall be validated .
2.8.1	Previously 2.7.1	Definition of CCPs expanded to include control points that may reduce food safety hazards to acceptable levels.
2.9.1	Previously 2.8.1	Critical limits supported by clear guidance or examples where CCP measurements are subjective. Removed reference to CCPs establishing based on government regulations and industry guidelines.
2.9.2	Previously 2.8.3	No significant change in wording.
	Previously 2.8.2	Removed reference to critical limits based on subjective data
2.10.1	Previously 2.9.1 and 2.9.2	Monitoring 'system' changed to monitoring 'procedure'. Changed 'batch sampling' to 'discontinuous measurement'.
2.10.2	Previously 2.9.3	Electronic records must be checked and verified.
2.11.1	2.10.1	No change in wording.
	Previously 2.10.2	Removed requirement for establishing documented procedures for appropriately handling of potentially unsafe products until they are confirmed suitable for release.
2.12.1	Previously 2.11.1 and 2.11.2	Verification procedures shall include control measures managed through pre-requisite programs.
2.13.1	Previously 2.12.1	HACCP documentation and recordkeeping shall include controls managed through pre-requisite programs.



2.14.1	Previously 2.13.1 and 2.13.2	Review of the HACCP Plan shall include pre-requisite programs. Reviews of HACCP plan shall include changes in product safety including the emergence of new risks (e.g. developments in scientific information, etc.).
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3.1 SOI	Previously 3.2 SOI	Processes and procedures to meet the requirements of the Standard shall be documented to allow consistent application, facilitate training, support due diligence, and production of a safe product.
3.1.1	Partially addressed in previous 3.2 SI	Quality manual may be printed or electronic. Procedures, working methods and practices shall be collated .
3.1.2	Previously 3.2.2	The food safety and quality manual shall be fully implemented. Standard refers to manual or 'relevant components'.
3.1.3	Previously in 3.7.1.2	Procedures and work instructions include photographs, diagrams, or other pictorial instructions.

3.2 SOI	Previously 3.7.1 SOI	There shall be a system to ensure only correct versions of forms are available and in use.
3.2.1	Previously 3.7.1.1, 3.7.1.2, 3.7.1.3 and 3.7.1.4	Document control system shall include: <ul style="list-style-type: none"> • List of controlled documents indicating a revision number • Method for identification and authorizing controlled documents • Revision history including any changes • System for replacing documents when updated.

3.3 SOI	Previously 3.7.3	No change in Record Completion and Maintenance Statement of Intent.
3.3.1	Previously 3.7.3.1 and 3.7.3.2	Electronic records must have a back-up system to prevent loss.
3.3.2	Previously 3.7.3.4 and	Records shall be retained for the shelf life of the product plus 12 months.



	3.7.3.5	
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★ 3.4 SOI	Previously 3.5 SOI	The company shall be able to demonstrate that they verify the effective application and implementation of the Standard.
3.4.1	Previously 3.5.1	Internal audits shall cover the HACCP program, pre-requisite programs, and procedures implemented to achieve this Standard.
3.4.2	Previously 3.5.2	No change
3.4.3	3.5.3 and 3.5.4	No change
3.4.4	New	A monthly inspection program shall be established and inspections documented. Inspections shall include: <ul style="list-style-type: none"> • GMPs • Sanitation and housekeeping • Facilities (e.g., walls, floors, ceilings, etc.)

3.5.1 SOI	Previously 3.6 SOI	Company shall have a supplier approval and monitoring system.
3.5.1.1	New	<ul style="list-style-type: none"> • Document a risk assessment of each raw material or group of raw materials to identify potential risks to safety, legality and quality. • Assessments shall include allergens, foreign body risks, microbiological and chemical contamination. • Raw material testing and acceptance criteria, supplier approval and supplier monitoring shall be based on the risk assessment.
3.5.1.2	Previously 3.6.2	<ul style="list-style-type: none"> • Supplier approval and monitoring shall be based on supplier audits and/or 3rd party audits or certification (e.g. BRC Global Standards). • If approval is based on questionnaires, these shall be done every 3 years and suppliers are required to notify site of any significant changes.
3.5.1.3	Previously 3.6.3	How exceptions are handled and now include where raw materials are prescribed by a customer or where products are purchased from agents.
	Previously 3.6.4	Requirement for trail period for new suppliers has been removed..



3.5.2 SOI	New	Establish controls for acceptance of incoming materials including food safety, legality and quality.
3.5.2.1	New	<ul style="list-style-type: none"> • Document procedures for receiving raw materials and packaging based on risk assessment. • Define list of raw materials and acceptance requirements. • Define incoming materials testing procedures.
3.5.2.2	New	<ul style="list-style-type: none"> • Incoming inspection procedures are implemented. • Records are available for incoming materials and packaging inspections
3.5.3 SOI	New	Risks from outside serves have been evaluated and controls are in place.
3.5.3.1	New	<ul style="list-style-type: none"> • Approval procedures for approval and monitoring of suppliers of services are implemented. • Services to covered shall include: <ul style="list-style-type: none"> ○ Pest Control ○ Laundry ○ Contract cleaning ○ Outside maintenance services ○ Transport and distribution ○ Offsite storage ○ Laboratory testing ○ Catering ○ Waste management
3.5.3.2	New	Contracts or agreements are in place with outside services and potential food safety risks are addressed
3.5.4 SOI	New	Sub contracted services for products within the scope of the certification are managed.
3.5.4.1	New	Outsourced processes are declared to brand owners and if required approval has been granted.
3.5.4.2	New	Outsourced suppliers are approved and have a documented site audit, 3 rd party audit or certified to a GFSI recognized Standard.
3.5.4.3	New	<ul style="list-style-type: none"> • Outsourced processing is contracted. Contracts include processing requirements and specifications. • Product traceability is maintained for outsourced suppliers.
3.5.4.4	New	Inspection and testing procedures are established for receiving of any outsourced product.
3.6 SOI	Previously 3.7.2	Work in process has been removed from this Statement of Intent.



3.6.1	Previously 3.7.2.1	Specifications shall have defined limits for relevant attributes.
3.6.2	3.7.2.2	No significant change.
3.6.3		Specifications shall be defined for all finished products.
3.6.4	3.7.2.3	No changes.
3.6.5	3.7.2.4	Specifications shall be reviewed at least every 3 years.

★ 3.7 SOI	Previously 3.8 SI	Senior Management is removed from the SI. Company must be able to demonstrate that they use the information from food safety and quality failures to make corrections and prevent recurrence.
3.7.1	Previously 3.8.1	Procedures shall be documented to address: <ul style="list-style-type: none"> • Assessment of consequences of a food safety or quality failure by a competent and authorized person • Identification of the root cause of the non conformity • Identification of corrective action for immediate issue and root cause
	3.8.2	Removed requirement that corrective actions be undertaken as soon as possible.
	3.8.3	Removed requirement of approval for corrective actions relating to food safety, legibility and regulatory compliance or quality only by personnel who have defined responsibility and accountability for the areas of control.
	3.8.4	Removed reference to monitoring corrective actions to ensure effectiveness and completion in a timely manner.

3.8 SOI	Previously 5.6 SI	Statement of Intent no longer specifies out of specification product has to be identified, labeled and quarantined. Only that the product be effectively managed to prevent release without authorization.
3.8.1	Previously 5.6.1, 5.6.2, and 5.6.3	<ul style="list-style-type: none"> • Staff identify and report potentially nonconforming product • Secure storage to prevent accidental release • Defined responsibilities for disposition decision making • Disposition decisions are documented • Records of product destruction when destroyed for food safety reason
	Removed from 5.6.3	<ul style="list-style-type: none"> • Quarantining nonconforming product is no longer stipulated

★ 3.9 SOI	Remained 3.9	Statement of Intent no longer specifies a 'system' for identifying and tracing and 'in a timely manner'.
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3.9.1	Previously 3.9.1	'Work in progress' replaced with 'intermediate / semi-processed products'.
3.9.2	Previously 3.9.2	Tests of traceability shall be done 'across the range of product groups'. Full traceability shall be achievable within 4 hours.
3.9.3	Previously 3.9.4	Statement removed: 'In addition, the company must be able to demonstrate that this does not affect the safety, regulatory, or legal status of the finished product....'.

3.10 SOI	Remained 3.10	Statement of Intent no longer specifies a 'system' for product complaints. Information shall be used to reduce recurring complaints.
3.10.1	Combined 3.10.1 and 3.10.2	Root cause of the complaint issue is recorded when sufficient information is provided.
3.10.2	Previously 3.10.2	No change.

3.11 SOI	Remained 3.11	No significant change in Statement of Intent.
3.11.1	3.11.1	Procedures for emergencies and incidents shall be documented.
3.11.2	3.11.3	Recall procedures shall be documented.
3.11.3	3.11.5	Results of recall testing used to implement improvements.
3.11.4	3.11.7	Certification bodies must be notified within 3 working days of a decision to issue a recall.

4.1 SOI	Remained 4.1	Specifically states "production site". Construction and design are to "reduce the risk of contamination" versus prevent contamination.
4.1.1	Unchanged	Measures put in place to protect the site includes potential contaminates and flooding. Changes to the site shall be reviewed.
4.1.2	Unchanged	External areas shall be maintained, grass and planted areas regularly tended.
	Previously 4.1.4	External traffic routes under site control shall be suitably surfaced and maintained was moved to 4.1.2 from 4.1.4.
	Previously 4.1.2	Reference to inclusion in the internal audit process was removed. Current 3.4.4 requirement for Internal Audits does not specifically include inspection of exterior grounds.



	Previously 4.1.3	Removed requirement regarding “where natural drainage is inadequate, external drainage shall be installed”.
4.1.3	4.1.5	Eliminate bird roosting sites

4.2 SOI		Products are “protected from theft or malicious contamination” versus “prevent access by unauthorized persons”.
4.2.1	New	<ul style="list-style-type: none"> Documented assessment of security arrangements and potential risks to products and any deliberate attempt to contaminate or damage. Sensitive or restricted areas shall be clearly defined, marked, monitored and controlled. Security arrangements shall be implemented and reviewed at least annually.
4.2.2	Previously 4.2.1	<ul style="list-style-type: none"> A visitor reporting system shall be in place. Access to the site by employees, contractors and visitors shall be controlled.
	Previously 4.2.2	<ul style="list-style-type: none"> Shall be trained in site security procedures and encouraged to report unidentified or unknown visitors.
	Previously 4.2.3	<ul style="list-style-type: none"> Measures in place to ensure only authorized personnel have access to production and storage areas.
4.2.3	Previously 4.2.6	No significant change to the requirement.

★ 4.3 SOI	No change	Wording changed to “prevent the risk of product contamination” versus “control the risk of product contamination.”
4.3.1	New	<ul style="list-style-type: none"> Areas where there are different levels of risk shall be designated. Reference is made to pre-requisite programs for the particular areas of the plant.
4.3.2	Previously 7.2.1	A site plan is required that designates: <ul style="list-style-type: none"> Production process flow Routes for removal of waste Routes for movement of rework
	Previously 7.2.2	There shall be designated walkways if access is required through a production area.
	Previously 7.2.3	Movement by personnel is by simply, logical routes.



4.3.3	Previously 7.2.4	Contractors and visitors, including drivers shall be made aware of procedures for access and requirements of the areas they are visiting with special reference to hazards and potential product contamination
	Previously 7.1.1	Contractors shall be under the supervision of a designated person
4.3.4	New	Low risk area not specifically addressed in Issue 5.
4.3.5	Previously 4.3.1.10	High care areas <ul style="list-style-type: none"> • Physical segregation • Where physical barriers are not in place, full evaluation of risks of cross contamination and alternative effective processes • Segregation shall take into account: <ul style="list-style-type: none"> ○ Flow of product ○ Nature of materials ○ Equipment ○ Personnel ○ Waste ○ Airflow ○ Air quality ○ Utilities
4.3.6	Previously 4.3.1.9	High risk “areas” changed from high risk “products” <ul style="list-style-type: none"> • Transfer points shall not comprise the segregation • Practices shall be in place to minimize the risk of product contamination (e.g. disinfection of materials on entry.)
4.3.7	Previously 4.3.1.5	No change in wording.
4.3.8	Previously 4.3.1.7	Added “ensure the safety and quality” of products.

4.4 SOI	Previously 4.3.2 SI	The word ‘construction’ replaced with the word ‘fabrication’.
4.4.1	Previously 4.3.2.1.1	Removed ‘design’ requirement.
4.4.2	Previously	Removed ‘design’ requirement. Shall be ‘suitably hard wearing’.



	4.3.2.2.1	
4.4.3	Previously 4.3.2.2.2 and 4.3.2.2.3	Drainage requirements combined into one requirement.
4.4.4	new	Specifically addresses drainage for high risk and high care area. Plan of drains including: <ul style="list-style-type: none"> • direction of drainage flow and • location of back flow devices
4.4.5	Previously 4.3.2.3.1	Wording changed from “accumulation of dirt, minimize condensation, and mold growth, and facilitate cleaning” to “prevent the risk of product contamination”.
4.4.6	Previously 4.3.2.3.2	Added roof voids. Facility inspections shall include voids in suspended ceilings unless the void fully sealed.
4.4.7	Previously 4.3.2.4.1	No change to wording.
4.4.8	Previously 4.3.2.4.2	No change to wording.
4.4.9	Previously 4.3.2.5.1 and 4.3.2.5.2	Reference to “raw material handling, processing, packing and storage areas” was reduced to “product areas”. Basic requirement regarding exterior doors was unchanged.
4.4.10	Previously 4.3.2.6.1	Reference to safe working environment removed for lighting.
4.4.11	Previously 4.3.2.6.2	Reference to fluorescent lighting changed to strip lights.
4.4.12	Previously 4.3.2.7.1	“Air flow” changed to “extraction”.
4.4.13	Previously 4.3.2.7.2	High care areas shall be supplied with sufficient changes of air. Filter specification and frequency of air changes shall be documented and be based on risk assessment
	4.3.2.7.3	Requirement for positive air-pressure systems retained.
4.5 SOI		Removed reference to “designed, constructed and maintained.”
4.5.1	Previously 4.4.1	Added minimum annual testing of water. Sampling point and frequency shall be based on risk assessment taking into account:



		<ul style="list-style-type: none"> • Source • Site storage and distribution facilities • Previous sample history • Usage.
4.5.2	New	Plan of water distribution system on site required.
4.5.3	New	Where legislation allows the use of non-potable water for initial product cleaning (e.g. storage / washing of fish), water shall meet these designated legal requirement for this operation
4.5.4	New	<ul style="list-style-type: none"> • Air, gases, and steam used in direct contact with or as an ingredient shall be monitored. • Compressed air shall be filtered.

4.6 SOI		No significant change.
4.6.1	Previously 4.5.1	Removed requirement that equipment be specified before purchase
	Previously 4.6.2	A commissioning process shall be established for new equipment and plant.
4.6.2	Previously 4.5.3	Equipment in direct contact with food shall be suitable for food contact and meet legal requirements.
	4.5.2	Removed requirement that equipment be secured and sealed to the floor.
	4.5.3	Removed requirement for certificates of conformity for equipment in contact with food.

4.7 SOI		Maintenance program shall be effective, prevent contamination and reduce potential for breakdowns.
4.7.1	Previously 4.6.1 and 4.6.2	<ul style="list-style-type: none"> • Maintenance shall be documented, planned and include a schedule or monitoring system.
4.7.2	Previously 4.6.4	Where there is a risk of product contamination, equipment shall be inspected at pre-determined intervals. Inspections shall be documented and appropriate corrective actions taken.
4.7.3	Previously 4.6.5	No change in wording.
4.7.4	Previously 4.6.3 and 4.6.7	No significant change in working



4.7.5	Previously 4.6.8	Lubricating oils shall be food grade.
4.7.6	Previously 4.6.9	Removed requirement that workshops be controlled.

4.8 SOI	Previously 4.7	Staff Facilities – no significant change to wording.
4.8.1	Previously 4.7.1 and 4.7.10	No changes. Slight wording change to incorporate visitor and contractors into changing facilities requirement.
4.8.2	Previously 4.7.2	Removed the word “reasonable”.
4.8.3	Previously 4.7.3	Added requirement to make available facilities to separate clean and dirty work wear.
4.8.4	High Care Area not specifically addressed in Issue 5	Addresses High Care Area. Specific requirements are for a specially designated changing facility and procedures that shall include: <ul style="list-style-type: none"> • Arrangements so that protective clothing not be contaminated before entry into the high care area. • Defined instructions for the order of changing into dedicated protective clothing • Dedicated footwear or for visitors only, shoe coverings • Segregation areas for high care footwear or effective boot wash on entrance into high care area. • Handwashing during changing procedure to prevent contamination of clean protective clothing • Hand disinfection upon entry into high care area.
4.8.5	Previously 4.7.11	Addresses High Risk Area. Specific requirements are for a specially designated changing facility that must include: <ul style="list-style-type: none"> • Defined instructions for the order of changing into dedicated protective clothing. • Dedicated footwear including segregation of high risk footwear from other footwear. • Visually distinctive footwear for high risk areas that is not worn in other areas. • Handwashing incorporated into the changing procedure to prevent contamination of clean protective clothing • Hand disinfection upon entry into high risk area.
4.8.6	Previously 4.7.4	Specified that water for hand washing be warm at a suitable temperature.



4.8.7	Previously 4.7.5	No change.
4.8.8	Previously 4.7.6	Handwashing facilities and reminders to wash hands no longer required after smoking.
4.8.9	Previously 4.7.7 and 4.7.9	No change to wording.
4.8.10	Previously 4.7.8	Control of catering facilities shall address prevention of product contamination for <ul style="list-style-type: none"> • Source of food poisoning • Introduction of allergenic material to the site

4.9 SOI	Previously 4.8	Chemical and Physical Product Contamination Control - No change to SOI wording
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	Removed 4.8.1	Removed requirement for risk assessments regarding potential risks from chemical, physical or biological contamination. Removed requirement to verify risks by regular site audits.
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4.9.1.1	Previously 4.8.2.1	Added purpose of chemical control “to prevent chemical contamination”.
4.9.1.2		Procedures in place to prevent the risk of taint from strongly scented materials or taint forming materials used for building work.

4.9.2.1	Previously 4.8.3.1 and 4.8.3.2	“Suitable controls” changed to record of inspection for damage and investigation of any lost items.
4.9.2.2	Previously 4.8.3.4	<ul style="list-style-type: none"> • Purchased ingredients and packaging shall not use staples. • Staples and paper clips shall not be used in open product areas. • Staples used as packaging material or closures shall be minimized and precautions taken to minimize risk of contamination.



4.9.3.1	Previously 4.8.4.1	Risk assessment requirement removed. Where glass and brittle materials are present in open product areas must be removed or protected against breakage.
4.9.3.2	Previously 4.8.4.2	Frequency of glass and brittle material inspections shall be based on a specified frequency based on level of risk to the product.
4.9.3.3	Previously 4.8.4.3	Risk assessment requirement removed.
4.9.3.4	New	Additional requirements where products are packed into glass or brittle containers.
4.9.3.4.1	New	Storage of containers shall be segregated from storage of raw materials product or other packaging
4.9.3.4.2	New	Systems in place to manage container breakages between cleaning / inspection point and container closure.
4.9.3.4.3	New	Records maintained for container breakages and production periods where there are no breakages.

4.9.4.1	Previously 4.8.5.1	<ul style="list-style-type: none"> • Risk assessment requirement removed. • Wood not used in open product areas except where a process requirement (e.g. maturation in wood). • Condition of wood in continually monitored to ensure good condition and free from damage or splinters which could contaminate products.
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4.10 SI	Previously 5.3	SOI reworded from “appropriate” detection equipment to “risk of product contamination shall be reduced or eliminated by the effective use of equipment to remove or detect foreign bodies”.
4.10.1.1	Previously 5.3.1	Replaced “justification” with <u>assessment in association with HACCP</u> shall be carried out on each production process to identify potential use of foreign body detection equipment. Typical equipment may include: <ul style="list-style-type: none"> • Filters • Sieves • Metal detection • Magnets • Optical sorting equipment • X-ray detection equipment • Physical separation equipment.
4.10.1.2	Previously 5.3.2	The location of the detection method or other factors influencing the sensitivity of the detector shall be validated and justified .
4.10.1.3	Previously	Frequency of testing detection and / or removal equipment takes into consideration:



	5.3.4 and 5.3.5	<ul style="list-style-type: none"> • Specific customer requirements. • Company's ability to identify hold and prevent release of affected materials.
4.10.1.4	New	<ul style="list-style-type: none"> • Source of any unexpected foreign material shall be investigated. • Information on rejected materials shall be used to identify trends and • Instigate preventative action to reduce the occurrence of the foreign material.
4.10.2	Previously 4.8.6.1	Filters and Sieves requirements expanded
4.10.2.1	New	<ul style="list-style-type: none"> • Specified mesh size or gauge • Designed to provide maximum protection for the product • Material retained or removed by the system examined and • recorded to identified contamination risks
4.10.2.2	Previously 4.8.6.1	<ul style="list-style-type: none"> • Inspection or testing for damage on a documented frequency based on risk. • Defective filters or screens shall be recorded and potential for contamination investigated.
4.10.3	Previously 5.3	Metal Detector and X-ray equipment requirements expanded
4.10.3.1	Previously 5.3.1	Metal detection equipment required unless risk assessment demonstrates protection of final product is not improved. Justification shall be documented. Absence of metal detection equipment would be based on use of more effective of alternative method.
4.10.3.2	New	Metal detector or X-ray equipment shall be situated at the latest practical step in the process and after the product has been packaged.
4.10.3.3	Previously 5.3.3	Automatic rejection device for continuous in-line systems
4.10.3.4	Previously 5.3.4	Procedures for testing shall include: <ul style="list-style-type: none"> • Responsibilities for testing • Operating effectiveness and sensitivity of the equipment and any variation to this for particular products • Method and frequency for checking the detector
4.10.3.5	New	Metal detector checking procedures shall be based on best practice and include: <ul style="list-style-type: none"> • Use of test pieces incorporating a metal sphere of known diameter • Test pieces shall be marked with size and type of test material



		<ul style="list-style-type: none"> • Tests shall be carried out using separate pieces containing ferrous, non-ferrous and stainless steel unless product is within a foil container • Tests shall test both detection and rejection mechanisms • Check shall test the memory / reset function of the metal detector by passing successive test packs through the unit • Test pieces shall pass as close as possible to the center of metal detector aperture and inserted the test piece within a clearly identified pack of the food being produced a the time of the test.
4.10.3.6	Previously 5.3.5	No change in wording.
4.10.4	Previously 4.8.6.1	<p>Magnets requirement given its own clause.</p> <ul style="list-style-type: none"> • Type location and strength of magnets shall be documented. • Documented procedures shall include inspecting, cleaning, pull strength testing and integrity checks. • Checks shall be documented.
4.10.5	New	<p>Optical Sorting</p> <ul style="list-style-type: none"> • equipment shall be checked in accordance with manufacturer’s instructions or recommendations. • Checks shall be documented.
4.10.6.1	New	<p>Container cleaning – glass jars, cans and other rigid containers</p> <ul style="list-style-type: none"> • Based on risk assessment, procedures shall be implemented to minimize potential of contamination from packaging (e.g. jars, cans and other preformed containers.) • Includes use of covered conveyors, container inversion and foreign body removal through the use of rinsing with water or air jets.
4.10.6.2	New	<ul style="list-style-type: none"> • Effectiveness of container cleaning equipment shall be checked and recorded during each production period. • Where a rejection system for dirty or damaged containers is incorporated in the system, a test of the detection / rejection shall be included.
★4.11 SOI	Previously 4.9	Wording of SOI is unchanged.
4.11.1	Previously	<ul style="list-style-type: none"> • Added “cleaning chemicals and concentrations”.



	4.9.1	<ul style="list-style-type: none"> Frequency and method of cleaning based on risk.
4.11.2	New	<p>Limits of acceptable and unacceptable cleaning performance shall be defined based on risks e.g. micro, allergen control or product contamination.</p> <ul style="list-style-type: none"> Acceptable levels may be defined for: <ul style="list-style-type: none"> visual appearance, bio luminance techniques, micro testing or chemical testing
	Previously 4.9.5	<ul style="list-style-type: none"> Cleaning and disinfection procedures shall be validated. Removed 4.9.6, revalidation of cleaning and sanitation after building or maintenance work, new product introduction or changes to equipment.
4.11.3	New	<ul style="list-style-type: none"> Resources for cleaning shall be available. Where it is necessary to disassemble or enter equipment for cleaning, cleaning shall be scheduled for non-production periods.
	Previously 4.9.3	Cleaning staff adequately trained.
4.11.4	New	<ul style="list-style-type: none"> Cleanliness shall be checked before released back into full production. Results of visual, analytical and micro checks shall be recorded Trends in cleaning identified and instigate improvements where required.
4.11.5	New	<p>Cleaning equipment:</p> <ul style="list-style-type: none"> Fit for purpose Suitably identified (e.g. color coded or labeled) Cleaned and stored in a hygienic manner to prevent contamination Equipment used in high risk and high care areas shall be dedicated for use in that area.
4.11.6	Previously 4.9.2	Scope of clause reduced to CIP facilities being monitored and maintained to ensure efficient operation.
4.11.6.1		<p>Schematic plan of the lay-out of the CIP system.</p> <p>Inspection report or other verification that:</p> <ul style="list-style-type: none"> Systems are hygienically designed Pumps are operated to ensure there is no build up of fluids in the vessels Spray balls effectively clean and periodically checked for blockages CIP equipment has adequate separator from active product lines



		<ul style="list-style-type: none"> • System shall be revalidated following alterations or additions to CIP equipment. • A log of changes made to the CIP system shall be maintained.
4.11.6.2		<p>Operated to ensure effective cleaning is carried out including:</p> <ul style="list-style-type: none"> • Procedures shall be defined • Procedures shall be validated • Detergent concentrations checked routinely • Process validation undertaken by analysis of rinse waters

4.12 SOI	Previously 4.10	Changed to waste disposal managed in accordance with legal requirements and to prevent accumulation risk of contamination and attraction of pests. Previously was “adequate systems”.
4.12.1	Previously 4.10.3	Scope of wording changed to address disposal of categorized waste only.
4.12.2	New	Animal feed products shall be segregated from waste and managed in accordance with relative legislative requirements.
4.12.3	Previously 4.10.4	Added disinfection where required.
4.12.4	Previously 4.10.5	Added disposal of unsafe products by third parties. Records shall include quantity of waste collected for destruction or disposal.

4.13 SOI	Previously 4.11	Changed to specify “whole site”, “effective preventative pest control program” and “resources to rapidly respond to any issues which occur to prevent risk to product”.
4.13.1	Previously 4.11.2	No change to wording.
4.13.2	New	<p>Where pest control is undertaken by the company:</p> <ul style="list-style-type: none"> • Pest control performed by trained and competent staff with knowledge of pest chemicals and biology of pests relevant to the site. • Resources to respond to any infestation • Access to specialist technical knowledge • Understanding of laws governing pest control products • Locked facilities for storage of pesticides
4.13.3	Previously	Changes to records include:



	4.11.3	<ul style="list-style-type: none"> • An up-to-date plan of the full site • Removed requirement that the site map be signed and authorized • Details of pest control products include actions to be taken in the event of emergencies • Any observation of pest activity • Details of pest control treatments under taken
4.13.4	Previously 4.11.4	<ul style="list-style-type: none"> • Removed reference to glue boards and sticky traps from clause. • Missing bait shall be recorded, reviewed and investigated. • Toxic rodent baits shall not be used within production or storage areas except when treating an active infestation.
4.13.5	Previously 4.11.5	“Insect light trap” changed to “fly killing devices”.
4.13.6	Previously 4.11.6	Any potentially affected products from pest infestation or pest activity should be subject to the nonconforming product procedure.
4.13.7	Previously 4.11.7	Records shall include recommendations of “pest proofing and hygiene”. Recommendations are carried out “in a timely manner”.
4.13.8	New	A pest control survey shall be undertaken at t frequency based on risk but not less than quarterly by a pest control expert to review pest control measures in place. The timing of the survey shall allow access to equipment for inspection where a risk of stored product insect infestation exists.
4.13.9	Previously 4.11.8	Trend analysis shall be the basis for improving pest control procedures.

4.14 SOI	New SOI Previously included in 4.12	Requirements for Storage Facilities separated from transportation.
4.14.1	Previously 4.12.1	Documented procedures understood by relevant staff including: <ul style="list-style-type: none"> • Managing chilled and frozen product between temperatures controlled areas. • Segregation of products to avoid cross contamination • Storing materials off the floor and away from walls • Specific handling or stacking requirements to prevent product damage
4.14.2	Previously	<ul style="list-style-type: none"> • Clause removed reference to “transport facility”.



	4.12.2	<ul style="list-style-type: none"> There shall be temperature recording equipment with suitable temperature alarms or a system or recorded manual temperature checks on at least an hourly basis or a frequency which allows for intervention before temperatures exceed defined limits for safety or product quality
4.14.3	New	<ul style="list-style-type: none"> Where controlled atmosphere storage is required, conditions shall be specified and effectively controlled. Records shall be maintained.
4.14.4	Previously 4.12.4	No change in wording.
4.14.5	Previously 4.12.5	Stock rotation of raw materials, intermediate product and finished product are used in relation to their manufacturing date within the prescribed shelf life.

4.15. SOI	New SOI Previously included in 4.12	Requirements for Dispatch and Transport separated from storage. Scope expanded to included “vehicles and containers used for transporting product from the site do not present a risk to safety or quality of the products”.
4.15.1	Previously 4.12.1	Documented procedures for product safety and quality during loading and transport may include: <ul style="list-style-type: none"> Controlling temperature of loading dock areas. Securing the loads on pallets to prevent movement during transit
4.15.2	Previously 4.12.7	Reference to storage removed.
4.15.3	New	All vehicles or containers used for dispatch shall be inspected prior to loading. Inspection are documented and shall ensure: <ul style="list-style-type: none"> Clean condition Free from strong odors which may contaminate product Suitably maintained to prevent damage to products during transit Equipped to ensure temperature requirements can be maintained.
4.15.4	Previously 4.12.2	<ul style="list-style-type: none"> Removed reference to storage. Temperature data-logging devices to confirm time / temperature conditions or a system to verify and record at pre-determined frequencies the operation of the refrigeration equipment. Temperature records shall be maintained.
4.15.5	Previously 4.12.8	No wording change to the clause. The e.g. was modified to refer to hoses used for “connecting to” silo installation.



4.15.6	Previously 4.12.9	Added requirement that documented procedures for transport of products include: <ul style="list-style-type: none"> • “Any restrictions on the use of mixed loads” • “Requirements for the security of products during transport particularly when the vehicles are parked and unattended”. Requirement was reworded regarding instructions for equipment breakdown or accidents.
4.15.7	Previously 4.12.6	Expanded requirement regarding certification of third party contractor to include any internationally recognized standard similar to the Global Standard for Storage and Distribution.

5.1 SOI	Unchanged	Replaced reference to “manufacturing processes” with “new product development process” and “changes to product, packaging or manufacturing “will ensure a safe and legal product.
5.1.1	New	Company guidelines shall define any restrictions to the scope of new products to control the introduction of hazards which would be unacceptable to the company or customers. Examples listed are allergens, glass packaging or microbiological risks.
5.1.2	Previously 5.1.1	HACCP based study replaced with requirement that the HACCP team leader or authorized HACCP team member approve all new products or changes to formulation, packaging or processing methods. This approval is required prior to introduction to the factory environment.
5.1.3	Previously 5.1.2	Slight change to wording; no change to requirement.
		Clause 5.1.4 from Issue 5 was removed.
5.1.4	Previously 5.1.3	Where shelf life trials prior to product are impractical, a documented science based justification for the assigned shelf life shall be documented.
5.1.5	Previously 5.1.6	<ul style="list-style-type: none"> • Removed reference to company’s senior management • There shall be a process to verify the ingredient and labeling is correct based on the product recipe.
5.1.6	Previously 5.1.7	No change.
		Clause 5.1.8 from Issue 5 was removed.

★ 5.2 SOI		Scope of SOI has been changed to only include Allergens
5.2.1	Previously 5.2.1.1	<ul style="list-style-type: none"> • Requirement for risk assessment has been removed. • Additional information from suppliers may be obtained to understand the status of the raw material, it’s ingredients and the factory in which it was produced.



5.2.2	Previously 5.2.1.2	Identification of allergens on site shall include: <ul style="list-style-type: none"> • Processing aides • New product development ingredients or products
5.2.3	Previously 5.2.1.3	A documented risk assessment is required to identify routes of contamination and shall include: <ul style="list-style-type: none"> • Consideration of physical state of the allergenic material • Identification of potential points of cross contamination • Assess the risk of cross contamination at each step • Identify suitable controls to reduce or eliminate the risk of cross contamination.
5.2.4		Documented procedures shall be established including: <ul style="list-style-type: none"> • Use of separator or additional clothing when handling allergenic materials • Identified, dedicated utensils for processing • Scheduling of production to reduce changes between products containing allergen and products not containing the allergen • Systems to restrict movement of air borne dust containing allergenic material • Waste handling and spillage controls
5.2.5	Previously 5.2.1.4	Wording is changed from “cross contamination from allergen-containing materials” to “rework containing allergens is not used in products that do not already contain the allergen”.
5.2.6	New	Where the nature of the process is such that cross-contamination from an allergen cannot be prevented, a warning shall be included on the label.
5.2.7	Previously 5.2.1.5	No change in wording.
5.2.8		The cleaning procedures shall be validated and routinely verified.
5.2.9	Previously 5.2.1.7	All staff including maintenance and contractors shall receive basic allergen awareness training and trained in the company’s allergen handling procedures. It is expected that this will be part of the company orientation.
5.2.10	New	Documented checks are required at line start up, product change over and batch changeover of packaging to verify that labels are correct for the product being packed.

5.3 SOI	New	Scope of SOI is for Provenance, Assured status and claims of Identify Preserved Materials Examples include Global GAP produce, marine stewardship, sustainable palm oil, kosher, halal, Madagascan vanilla, basmati rice, red tractor meat, etc.
5.3.1	Previously	<ul style="list-style-type: none"> • Scope expanded to include claims made about provenance or assured status of raw materials.



	5.2.2.1	<ul style="list-style-type: none"> Status of each batch shall be verified. Requirement for risk assessment has been removed.
5.3.2	New	<ul style="list-style-type: none"> For claims relating to provenance or assured status of a product or ingredient are made, facility shall maintain purchasing records, traceability of raw material usage and final product packing records to substantiate claims. documented mass balance testing is required at least every six months.
5.3.3	Previously 5.2.2.2	<p>Process flows shall be documented</p> <p>Potential areas for contamination and loss of identity identified.</p>

5.4 SOI	No change	No change in SOI wording
5.4.1	New	Supplier of packaging shall be made aware of particular characteristics of the food (e.g. high fat content, pH) or usage conditions that may affect packaging suitability.
5.4.2	Previously 5.4.2 and 5.4.3	Obsolete packaging shall be stored in a separate area and systems in place to prevent accidental use.
5.4.3	Previously 5.4.4	The wording “ Resistant to tearing ” replaced “sufficient gauge”.

5.5 SOI	No change	Removed last words of SOI; “which prevent risk to product safety”.
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5.5.1.1	No change	Minor wording changes.
5.5.1.2	No change	Minor wording changes.
		Removed clause 5.5.1.3 of Issue 5 regarding organoleptic tests.
5.5.1.3	Previously 5.5.1.4	No wording changes.

5.5.2.1	No change	Internal labs conducting pathogen testing shall be fully segregated from the manufacturing site and have operating procedures to prevent any risk of product contamination
5.5.2.2	No change	No changes.
5.5.2.3	No change	No changes.
5.5.2.4	No change	No changes.



5.6 SOI	Previously 5.7	
5.6.1	Previously 5.7.1	Removed specific requirement for risk assessment and changed to “where products require positive release”.

6.1 SOI	No change	SOI wording changed to documented procedures and / or work instructions. Word “verify” changed to “ensure”.
6.1.1	No change	<p>Clause reworded to replace reference to CCPs. Documented process specifications and work instructions required for key processes that ensure product safety, legality and quality. Clause expanded to include:</p> <ul style="list-style-type: none"> • Recipes • Mixing instructions, speed, time • Equipment processing settings • Cooking times and temperatures • Cooling times and temperatures • Labeling instructions • Coding and shelf life marking • Any additional critical control points identified in the HACCP plan.
6.1.2	No change	No change to meaning of clause. Replaced word “established” with “implemented”.
		Removed clause 6.1.3 regarding process monitoring carried out by trained personnel.
6.1.3	Previously 6.1.4	No change
6.1.4	New	Where variation in processing conditions may occur within equipment critical to safety or quality of products, processing characteristics shall be validated at a frequency based on risks.
6.1.5	No change	No change
6.1.6	New	<ul style="list-style-type: none"> • Documented line checks shall be conducted prior to commencing production to ensure lines are cleaned and ready for production. • Documented checks shall be carried out at product changes to ensure all products and packaging from previous production have been removed.
6.1.7	No change	<ul style="list-style-type: none"> • Procedures shall be documented. • Checks shall be performed to verify correct packaging at start of packing, during packaging run and



		<p>following packaging changes and when batches of packaging materials.</p> <ul style="list-style-type: none"> • Checks shall include verification of code information or other printing performed at the packing stage.
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6.2 SOI	No change	Minor wording changes. No change to requirement.
6.2.1	No change	Records of checks shall be maintained.
6.2.2	No change	Records shall be maintained

6.3 SOI	No change	SOI has been simplified for clarity.
6.3.1	Elements of requirement previously in 6.3.3	<p>Company shall identify and control measuring equipment. This shall include:</p> <ul style="list-style-type: none"> • Identification code and calibration due date • Prevention from adjustment by unauthorized staff • Protection from damage, deterioration or misuse.
6.3.2	No change	Removed reference to “trained staff”
6.3.3	Previously 6.3.2	No change
6.3.4	No change	Where the safety or legality of products based on equipment are found to be inaccurate, action shall be taken to ensure at-risk product is not offered for sale.

★ 7.1 SOI	No change	No change.
7.1.1	No change	No change.
7.1.2	No change	Competency testing is required for personnel engaged in activities relating to critical control points.
7.1.3	No change	No change.
7.1.4	No change	Where training is undertaken by a third party on behalf of the company, records of the training shall be available.
7.1.5	No change	No change.

		Requirements in Issue 5 Clause 7.2, Access and Movement of Personnel have been moved to Issue 6, Clause 4.3
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7.2 SOI	No change	SOI has been reworded with no change in meaning. Added “agency staff”, i.e. temporary workers. The words “appropriate to products” replaces “with due regard to product contamination”.
7.2.1	Previously	Requirement for risk assessment removed.



	7.2.1, 7.2.2, 7.2.3 and 7.3.5	Allowance for continuous loop ear rings removed.
7.2.2	Previously 7.3.4	<ul style="list-style-type: none"> Requirement for risk assessment of frequency of hand washing removed. Handwashing required at entry to production areas.
7.2.3	Previously 7.3.8	<ul style="list-style-type: none"> Removed exception for use of metal detectable bandage (e.g. where metal detector / X ray equipment is in use. Finger covering changed to glove to cover bandage on finger.
7.2.4	Previously 7.3.9	Where metal detector equipment is used, a sample of each batch of bandages shall be tested.
7.2.5	Previously 7.3.10	No change.

7.3 SOI	Previously 7.4	Minor rewording. No change in Medical Screening requirement.
7.3.1	Previously 7.4.1	No change.
7.3.2	Previously 7.4.2	Removed the wording completion of a health questionnaire prior to entering the factory.
7.3.3	Previously 7.4.3	No change.

7.4 SOI	No change	No change to SOI
7.4.1	Previously 7.5.1	Requirement for risk assessment has been removed.
7.4.2	Previously 7.5.2, 7.5.6, and 7.5.7	<ul style="list-style-type: none"> Removed requirement for risk assessment of beards and moustaches. Protective clothing includes snoods for beards and moustaches where it is required to prevent product contamination. No external pockets above the waist
7.4.3	Previously 7.5.4	Employee laundering is only approved when <ul style="list-style-type: none"> the clothing is to protect the employee from the product and the clothing is worn in enclosed product or in low risk areas only.



7.4.4	New	Auditing of laundry is only required for protective clothing worn in high care or high-risk areas. Laundry must operate procedures which ensure: <ul style="list-style-type: none">• Effective cleaning• Commercially sterile• Adequate segregation between dirty and cleaned clothes• Cleaned clothes protected from contamination until delivery to the site
7.4.5	Previously 7.5.9	No change
7.4.6	New	Protective clothing that are not suitable for laundering (e.g. chain mail, gloves, aprons) shall be cleaned and sanitized at a frequency based on risk.