HM Government

Review into the Integrity and Assurance of Food Supply Networks

Note of meeting with the British Retail Consortium Global Standards

Location: BRC, 21 Dartmouth Street, London

Date: 2 September 2013

Attendees:

Mark Proctor - Chief Executive Officer, BRC Global Standards

Dave Brackston – Technical Director, Food, BRC Global Standards

Elizabeth Andoh-Kesson Policy Officer, BRC Global Standards

Professor Chris Elliott – Independent Reviewer – Review into the Integrity and Assurance of Food Supply Networks

Mary Newman – Secretary - Review into the Integrity and Assurance of Food Supply Networks

David Foot – Assistant Secretary - Review into the Integrity and Assurance of Food Supply Networks

1. BRC Standard

Professor Chris Elliott said he was keen to get a better understanding of how the BRC standard was used by industry and what changes might be under consideration following the horsemeat incident. BRC confirmed that no additional requirements had been added since the horsemeat incident. That reflected the fact that the standard was update every three years and a new version was being prepared. The system already had elements which should help ensure food supply integrity. For example raw materials risk assessment informed systems to approve suppliers. Auditors from the certification bodies would be checking revised company testing regimes following the horsemeat incident.

The BRC Standard was used in 16,000 sites with 2,500 in the UK. There were around 80 certification bodies accredited to undertake audits. They employed around 1500 auditors. There were a number of controls in place to ensure high quality audits took place.

CE asked how BRC ensured high quality audits took place. BRC explained that the industry was divided into 18 product sectors by the BRC and auditors had to demonstrate experience in the product category they would be auditing. Certification bodies had to ensure their auditors were competent. Accreditation was handled by UKAS in the UK and

by equivalent single bodies in other countries. The certification body also had to be accredited to ISO Guide 65. Certification bodies were licensed by BRC. There was a requirements document which set out how certification bodies were expected to operate. BRC set KPI's for the certification bodies which were checked every 6 months. BRC sent surveys to sites to get feedback on auditor competence. BRC had a complaints system but had received few complaints about the conduct of audits. Those that were received were about auditors alleged to have been over zealous. BRC conducted follow up audits of sites inspected to check audit results. Results of audits were held on a BRC database and the information could be mined to assess the operation of certification bodies. BRC held an annual conference for certification bodies to discuss issues arising from audits and operation of the Standard. BRC held calibration webinars for certification bodies and information was cascaded to auditors. Another aid to ensuring high standards was the fact that certification bodies could be de-registered for poor performance and that would have a significant impact on their business.

CE asked for clarification about when unannounced audits would take place. BRC explained that most audits were pre-arranged to ensure the right people were on-site to deal with the audit. Under the Standard a site could be awarded the highest mark of A+ if they successfully passed an unannounced audit. Currently only around 40-50 companies had chosen unannounced audits. That might change in light of the decision by Asda that unannounced audits would take place at all of their supplier sites from October. Other retailers might follow their example.

CE asked for details on how non-conformances were dealt with. BRC said that if a critical non-conformance was identified the site would not receive its certificate. Other non-conformances would be re-assessed, including by a further audit if necessary. BRC confirmed that critical non-conformities were not notified to FSA or the relevant local authority by the BRC. Trust was an issue for companies as they were nervous about how the information would be used. BRC said that companies not performing well could decide to drop out of the BRC scheme but that could have commercial implications for them because of customer requirements to be within the scheme. BRC did not announce when a company dropped out of the scheme, but results for the company would no longer be recorded and made available from the BRC database and so potential customers would know the company was not part of the scheme.

CE asked about the role of the Standard in helping a company to achieve 'earned recognition' from regulators. BRC said that this was being discussed with the Food Standards Agency but was not yet in place.

CE asked about sampling by certification bodies. BRC said that no sampling was required under the scheme to verify audit results. Retailers did their own testing.

CE thanked BRC for taking the time to explain the way the Standard was operated.

30 October 2013