CERTIFICATION GUIDELINES

Global Standard for Food Safety (Issue 7 - January 2015)

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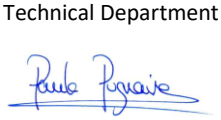
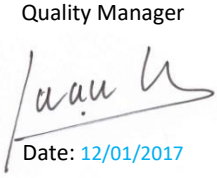
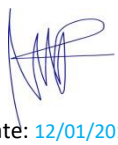
Technical Department  Date: 12/01/2017	Quality Manager  Date: 12/01/2017	Operations Manager  Date: 12/01/2017	12

REASON FOR NEW REVISION:

Bulletins/Statements issued by BRC in 2016: changes in the audit duration, voluntary modules and review of the control program.

CERTIFICATION GUIDELINES

Global Standard for Food Safety - BRC Issue 7 - January 2015

1. CERTIFICATION SYSTEM OF THE GLOBAL STANDARD FOR FOOD SAFETY (Issue 7)

1.1 APPLICATION PROCEDURE

Once ACERTA is aware of the interest about the certification in accordance with the Global Standard for Food Safety by a company, ACERTA Administration Department will contact this company to request some basic information that will let ACERTA make the appropriate quotation. In order make the process easier, the applicant may use the document **"*Information Request Form*".**

Next, an appropriate quotation is made by using the ACERTA management computer system (SIG), to be then reviewed by the Administration Manager.

The quotation includes the costs derived from the certification process and a specification of the items detailed in the said costs: application procedure, file opening, certification inspection, certification decision-making process, issue of the certificate, and, at the customer's request, a previous inspection of the facilities. The method of payment and the IFS fees, paid by the customer through ACERTA, are also specified in the quotation.

The applicant who wishes to begin the certification process shall send this quotation appropriately accepted. The Technical Department includes then the accepted quotation in the SIG and files the document in hard copy in the appropriate folder.

Once the approved quotation is received, the Technical Department sends the applicant the "***Certification Request Form***", to be sent back to ACERTA duly filled in. This form includes all relevant details concerning the scope of the certification, like e.g. **"types of products", "types of processes"** and **"m2 of manufacturing facilities"** and "number of employees" to be certificated, and it also includes a link to the ***"BRC Certification Guidelines"*** and to the ***"User Guidelines of ACERTA Hallmark"***.

Together with the "Certification Request Form", the ***"SGC Certification Agreement"*** is sent. This document establishes the conditions that will regulate the commercial relationship between ACERTA and the applicant company. The duration of the agreement will be 1 year. The applicant shall send back ACERTA this ***"SGC Certification Agreement"*** duly dated, signed, and if possible, sealed.

These documents will be accepted by ACERTA either received by mail (original document) or received by fax (a copy) provided that the applicant is clearly identified.

The Technical Department will then review the **"*Certification Request Form*"** sent by the customer, and once this document is checked, a file will be opened in the SIG, assigning a code automatically. The file code assigned is made up of the acronym "BRC", the code of the customer, the digits of the year in which the certification is made and a correlative number to identify the works undertaken in that site.

E.g. BRC.000582-10/002

Then, a folder is opened for each certification applicant, identified with the appropriate code, so that the hard copies are adequately filed and maintained. The electronic records will be also filed in the appropriate computer folder.

The Manager of the Technical Department (or the Technical Manager Assistant in his absence) will then draw up a plan for the auditing work by using the SIG from the review of the ***"Certification Request Form"***. He will assign the auditor, determine the working days needed for the audit, define the specific time period established for the audit and inform the auditor or auditor team in writing through the "***Audit Order***". Likewise, he will ensure that no site is audited more than 3 consecutive times by the same auditor, unless exceptional circunstances like e.g. audits in special or remote areas. All exceptions shall be clarified in the appropriate "***Audit Report***".

The audits against the BRC standard may be conducted either by ACERTA own staff or by external auditors (subcontracted and with exclusivity with ACERTA), provided that they are previously approved by BRC and ACERTA for the certification of the standard.

Then, every auditor is responsible for arranging the specific previous / certification audit date, by following the instructions detailed in the "***Work Order"***.

1.2 CERTIFICATION AUDIT

Once all relevant aspects of the audit and the assessment of the documents provided by the applicant company have been determined, the auditor will draw up the "***Audit Plan"*** to be sent both to the applicant and to ACERTA Technical Deparment. In the event that the applicant does not agree with any aspect detailed in that document, he/she will be able to communicate it within 3 days after its reception. In this case, the auditor or the Technical Department, and the applicant, shall have to reach an agreement, and a new "***Audit Plan"*** will be issued.

The auditor will then perform the audit by using the document: "***Audit Checklist"*** in accordance with the Global Standard for Food Safety.

The on site audit is made up of the following steps:

1. Opening meeting: to confirm the scope and process of the audit.
2. Document review: a review of the documented HACCP and quality management systems.
3. Traceability test, including a vertical audit of associated production records. The customer shall be able to achieve full traceability within 4 hours.
4. Production facility inspection: to review practical implementation of the systems, including product changeover procedures, and interview to the appropriate staff.
5. Inspection of production facilities: for the verification and additional review of the documents.
6. Final review of findings by the auditor: preparation for the closing meeting.
7. Closing meeting: to review audit findings with the company. Non-conformities are subject to subsequent independent verification by ACERTA Senior Management. A written summary of the non-conformities discussed at the closing meeting will be documented by the auditor in the "***Final part of Checklist***".

Senior managers with the appropriate authority to ensure that corrective action can be progressed shall attend both opening and closing meeting.

1.3 PRELIMINARY AUDIT REPORT AND CORRECTIVE ACTION PLAN

Once the audit is finished, the auditor will issue the ***"Preliminary" Audit Report***, based on the "***Audit Checklist***". This report will be made in computer format and sent (PDF format) to the customer together with the document "***Corrective Action Plan"***, within 2 weeks after the audit.

The auditor shall include in this report the **type** and **number** of non-conformities found during the audit.

The auditee shall then draw up and submit the "***Corrective Action Plan"*** together with the **objective evidence** needed to solve the non-conformities and the root cause of non-conformities **within 28 calendar days** from the first date of the audit.

The "***Corrective Action Plan"*** and the objective evidence shall be easily accessed for reading, clear and accurate. If not, they will be sent back to the auditee.

If the "***Corrective Action Plan"*** is not approved, or the objective evidence provided are not adequate, ACERTA will be able to undertake a "***Follow-up audit*****"**. At the time of this "***Follow-up audit*****"**, the auditor will only focus on the outstanding non-conformities, so that he/she will check whether the company has solved the non-coformities arisen during the previous audit or not.

1.4 AUDIT REPORT

Once the "***Corrective Action Plan***" has been assessed by the auditor, an "***Audit Report***" will be issued (including a positive or negative recommendation by the auditor/person in charge of the technical review) and this report will be sent to the person(s) responsible for the certification decision.

For every audit undertaken, the appropriate audit report will be issued, complying with the format defined by the BRC organization. The report will be issued in English language and/or, when appropriate, in a different language, depending on the needs of the auditee.

The report includes the following sections:

- PART 1: AUDIT DETAILS (IN ENGLISH LANGUAGE)
- PART 2: SUMMARY OF NON-CONFORMITIES/CORRECTIVE ACTION PLAN (IN ENGLISH LANGUAGE)
- PART 3: DETAILED AUDIT REPORT (SECTION SUMMARIES IN ENGLISH LANGUAGE).

The report shall accurately detail the findings obtained by the auditor at the time of the audit. The section "Detailed audit report" of the report shall include summaries for all sections describing the procedure and objective evidence.

The reports shall be drawn up and sent to the customer within 42 calendar days after the audit, unless special circumstances occur.

ACERTA shall send the customer the "***Audit Report***" after the certification decision, and a copy of this report will be kept in a safe place for 5 years together with any other document connected with it.

The "***Audit Report***" shall not be reproduced fully or in part by ACERTA without the written permission of the holder (unless the law so requires); express consent may be given as a part of the contract between the company and the user, or between the company and ACERTA.

1.5 CERTIFICATION DECISION

In order to make the certification decision, the appropriate responsible person, according to the structure detailed in the quality procedure PC-03 "Assessment of results, certificate awarding", shall take into account what is described in the chapter 3 of this document.

To begin the certification decision process, the Technical Department is in charge of collecting all documents to be assessed, which shall include, at least, ***"Certification Request Form"***, "***Audit Report***", "***Corrective Action Plan***" and objective evidence.

The Technical Department shall be responsible for the file and for the process to be completed, providing the person responsible for the "***Technical Review and Certification Decision***" all documents needed.

1.6 NOTIFICATION OF CERTIFICATION DECISION AND CERTIFICATE OF CONFORMITY

ACERTA shall assess all information included in the file of the applicant, and shall detail the decision made in the "***Technical Review and Certification Decision***". Once the certification report has been issued, the Technical Department shall inform the applicant, within 42 calendar days after the audit, of the certification decision.

When the decision is positive, the "***Certificate of Conformity***", appropriately signed by ACERTA representative, will be sent to the holder together with the "***Audit Report***", once the payment has been confirmed. The certificate will be valid from the issue date detailed in the document, for 6 or 12 months, depending on the grade obtained. The certificate will

be issued for every specific production facility, and both the audit grade awarded and the product category(ies), defined in the Appendix 6 of the Global Standard for Food Safety (Issue 7) will be indicated.

In case of a failed audit, the grade of the non-conformities will be reviewed in an ACERTA independent certification process in two days after the audit.

The certificate shall comply with what is established in the Appendix 5 of the standard and with the user guidelines in relation to BRC and ACERTA logos. Its compliance will be verified during the audit, and the findings obtained will be detailed in the section "Company Profile" within the "***Audit Report***".

The certificate shall always include the following information:

- ACERTA Certificación, S.L. logo or name.
- The logo of the Accreditation Body responsible for the accreditation under *UNE-EN ISO/IEC 17065* to certify BRC
- BRC logo.
- ACERTA Certificación, S.L. name and accreditation number
- Name, BRC SITE CODE and address of the site audited.
- Name of the lead auditor.
- Product certification scheme, that is, GLOBAL STANDARD FOR FOOD SAFETY, Issue 7 – January 2015.
- Audit scope (product and process details).
- Inclusion of voluntary modules (when appropriate)
- Exclussions from scope.
- Product categories.
- Audit programme.
- Grade obtained.
- Audit date/s (day/month/year), including two possible audit date ranges for unannounced option 1 and unannounced option 2. In the event of an extension to scope, it includes the original audit date and the re-audit date.
- Certificate issue date (day/month/year).
- Re-audit due date (day/month/year).
- Certificate expiry date (6 or 12 months from the certificate issue date, as appropriate), (day/month/year).
- Name and signature of ACERTA manager /representative.
- Place and date of signature.
- Full name and address of ACERTA.
- Certificate number (traceable reference).
- The text "This certificate is property of ACERTA Certificación, S.L.".
- The text "If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, please contact enquiries@brcglobalstandards.com or call the Tell BRC Hot line +44 (0)20 7717 5959."
- The specification "Visit the BRC Directory *www.brcdirectory.com* to validate the authenticity of this certificate"
- In case of reissue "Reissued after extensión to scope/ Reissued for company name- address- change"

The audit, the "***Audit Report***" and the "***Certificate of Conformity***" will be specific for the "manufacturing site" and its products

ACERTA will advise the ***certificate*** holders to verify the scope detailed in the certificate, so that the information shown meets the company's own requirements. Although the certificate is granted to the company, it will be property of ACERTA, the one to control its use, ownership and display.

The company has the right to appeal the certification decision made by ACERTA, and any appeal should be made, in writing, and sent within 7 calendar days from the reception of the certification decision.

In the event that the interested party does not agree with the decision, ACERTA Technical Department will give him/her the appropriate format established for appeals. The appeals will finish within 30 calendar days after its reception. The appeal procedure as described within ACERTA internal quality procedure: PC-05 "Appeals, complaints and lawsuits" will begin once the appeal record, adequately completed, is received. Once a detailed and exhaustive investigation process on the subject is finished, the definitive answer will be communicated in writing to the company.

In the event of an unsuccessful appeal, ACERTA has the right to charge costs for conducting the appeal.

ACERTA will upload the audit relevant data and the "***Audit Report***" in the BRC Directory within 49 calendar days from the date of the audit.

In the event that the customer does not make the appropriate payment of the audit, the "***Audit Report***" will not be uploaded in the BRC Directory, and this circumstance (non-payment) will be detailed in the "Comments" section. Its status (certificated) will not be public. No "***Certificate of conformity***" will be issued and no "***Audit Report***" will be available for this customer.

1.7 EXTENSIONS TO SCOPE

Once the certification has been granted, any additional significant product manufactured or process undertaken by the site that are required to be included in the scope of certification, shall be communicated to ACERTA, who will evaluate the possibility of issuing a direct extension of the current scope of the necessity of conducting an on-site scope extension audit ("***Follow-up audit***") to examine the aspects of the required extension to scope.

A "***Follow-up audit***" will be required always when any of the following circumstances is met:

- Inclusion of new production facilities
- Inclusion of new process technologies
- Inclusion of new products that pose a significant risk.

The current "***Certificate of conformity***" will be superseded by a new certificate using the same expiry date detailed in the orginal certificate.

1.8 CERTIFICATION MAINTENANCE: RENEWAL

Once the validity of the certificate expires (1 year in the case of certificates with "A" and "B" grades, and 6 months in the case of certificates with "C" and "D" grade), the certification maintenance process begins.

For this purpose, about 6 months before the renewal date, ACERTA Technical Department will inform the certifcate holder of the new activities to be carried out to maintain the certification. A new "***Certification Request Form***" will be sent so that the current scope is detailed.

The Technical Department will contact the company to agree the date of the renewal audit. All appropriate steps will be taken by following the same criteria used for the previous certification audit. A due audit date will be agreed sufficiently in advance from the calcullation of the date of the initial audit so that the certificate does not expire (from 28 days before initial audit date).

1.9 OPTIONAL UNANNOUNCED AUDITS

In order to demonstrate confidence in their quality and safety systems, the companies may choose to participate in the **optional unannounced audit programme**.

The decision to participate in this scheme depends exclusively on the company, and is open to any site that is currently awarded a **certification Grade AA, AA+, A, A+, B, B+, C o C+, D o D+** and to non-certified companies during the regular annual audit. Sites that are not currently certified shall take into account that it is possible that the audit "has no place in the period of one year from the date of application".

Successful completion of the audit will result in the awarding of **certification grade AA, A, B, C o D**. The unannounced audit will be distinguished by a **(+)**, so companies completing the audit successfully will be awarded **AA+, A+, B+, C+, o D+ Grades**, where **+ indicates an unannounced audit**. This grade will be detailed in the Certificate, which will supersede the existing certificate, to be then revoked.

Two unannounced audit programmes are available. The applicant company shall choose the appropriate option in the "***Certification Request Form***".

1.9.1. Option 1 - Full Unannounced Audit:

- This option involves a single unannounced audit against all the requirements of the Standard with complete duration in accordance with audit duration standards.
- The stie shall notify ACERTA within 3 months of the last audit date, either by the "***Certification Request Form***" or contacting the Technical Department.
- In the case of BRC/IFS combined audits, the company may request **the first unnanounced audit to ACERTA up to 16 weeks before its initial audit date**. The subsequent unnanounced audits must be confirmed before 3 months since the last audit date. ACERTA will begin the unannounced audit always before of the initial audit date.
- This option allows for a number of days (up to 15) to be blocked out from the audit plan as non-audit days. ACERTA shall be informed of these "non-audit dates" at the time of opting for the unannounced audit programme by the customer. The dates shall be provided at least 4 weeks in advance and appropriate justification shall be provided as well. Those days when the factory is not operating (e.g. weekends, public holidays, planned shutdowns for site holidays or maintenance) will not be included within these 15 days.
- In the case of seasonal production.
  - The expected seasonal production dates shall be notified to ACERTA at the moment of choosing the "unannounced scheme".
  - No dates may be excluded within the production season.
- The Technical Department Manager (or the Quality Manager in his absence) or Auditor Coordinator, will schedule the unannounced audit by using the SIG from the review of the "***Certification Request Form***", to then assign the auditor team, determine the working days needed for inspection, define the

audit dates and communicate, in writing, the auditor or auditor team assigned, all through the "***Work Order***".

- The dates for performing the unannounced audit shall be choosen between months 3 and 12 of the audit date; this shall typically be within the last four months of the certification cycle.
- The auditor shall appear in the production facility in the appropriate date and shall begin the audit without prior notice. The site shall be obliged to accommodate the auditor and allow the audit to start immediately on arrival to the site. If not, ACERTA will charge the costs of this audit to the customer, and the site will revert to the announced audit scheme. At the discretion of ACERTA, the existing certificate may also be suspended or withdrawn.
- The audit will begin with the site production facility inspection (it will normally proceed to the production factory inspection within 30 minutes of arrival).
- The rest of the process shall be the same as described within sections 1.4 to 1.7, within the general audit protocol with the exception that the "***Audit Report***" and "***Certificate of conformity***" will specify "Unannounced option 1".
- The new certificate shall be issued within 42 days of the audit and will have an expiry date based on the expiry date of the previous certificate plus 12 months, providing the company remains within the unannounced audit scheme. If the company decides to return to the announced audit programme or is awarded a "C" Grade, the certificate expiry date will be based on 6 or 12 months from the date of the unannounced audit.

1.9.2 Option 2 – Two part Unannounced Audit:

- The option two unannounced audit scheme divides the audit requirements into two separate audits, each of which takes the half of the full duration. The first audit will be carried out as an unannounced audit, and the second audit can be announced.
- The company shall notify ACERTA the wish to join the option 2 unnannounced audit programme within the first 3 months following the qualifying audit, either by the "***Certification Request Form***" or by contacting the Technical Department.
- In the case of BRC/IFS combined audits, the company may request **the first unnanounced audit to ACERTA up to 16 weeks before its initial audit date**. The subsequent unnanounced audits must be confirmed before 3 months since the last audit date. ACERTA will begin the unannounced audit always before of the initial audit date.
- The option 2 unnanounced audit programme allows for a number of days (up to 10) to be blocked out from the audit plan as non-audit days. These "non-audit" dates shall be provided at least 4 weeks in advance and appropriate justification shall be provided as well. Those days where when the factory is not operating (e.g. weekends, public holidays, planned shutdowns for site holidays or maintenance) will not be included within these 10 (as appropriate) "non-audit" days.
- For seasonal production sites:

  • The expected seasonal production dates shall be notified to ACERTA at the time of choosing the "unannounced scheme".

  • No dates may be excluded within the production season.

  • where the option 2 scheme is chosen, the audit will take place first at pre-arranged date at least 28 days before the expected start to the season. The part 1 gtood manufacturing practice audit will be carried out as an unannounced audit during the season.
- The Technical Department Manager (or the Quality Manager in his absence) or Auditor Coordinator, will schedule the unannounced and announced audits by using the SIG from the review of the

"***Certification Request Form***", to then assign the auditor team, determine the working days needed for inspection, define the audit dates and communicate, in writing, the auditor or auditor team assigned, all through the "***Work Order***".

- **Unannounced "Good Manufacturing Process" based audit:**

1. The requirements covering the GMP (indicated in key orange color) are audited. Supporting documentation (normally covered in a part 2 audit) may be requested when required to complete an audit trail.
2. It shall occur at any stage between months 6 and 10 after the last audit date.
3. The option 2 programme allows for a number of days (up to 10) to be blocked out from the audit plan as "non-audit days". ACERTA shall be notified of these "non-audit days" when completing the certification request form or at the time of opting for the unannounced audit programme.
4. The auditor shall appear in the production facility in the appropriate date and begin the audit without prior notice. The site shall be obliged to accommodate the auditor and allow the audit to start immediately on arrival to the site. If not, ACERTA will charge the costs of this audit to the customer, and the site will revert to the announced audit scheme. At the discretion of ACERTA, the existing certificate may also be suspended or withdrawn.
5. The audit will start with the production facility inspection (no later than 30 minutes within auditor arrival).
6. At the end of the audit, ACERTA will provide a written summary of non-conformities discussed in the closing meeting and detailed in the document "***Final Part of Checklist***" (exceptionally within one working days of the audit).
7. The customer shall solve the non-conformities detected at the time of the audit and define a plan to identify the root cause of the non-conformance. For this purpose, the auditor will send the customer the "***Corrective Action Plan***". The customer shall submit the appropriate documents within 28 days of the audit date, for review. These corrective actions will be reviewed as part of the part 2 audit, although the audit grade will not be modified.
8. In the case that the number and level of non-conformities identified at the part 1 audit would result in the failure to achieve a certificate, the existing certificate for the site shall be immediately withdrawn.

- **Announced audit of systems and documentation:**

1. The audit will cover systems and documentation (green color).
2. It shall be arranged with the site in the 28-day window up to and including the audit due date indicated on the certificate.
3. The auditor shall agree the audit date with the site, prepare and send the "***Audit Plan***" and undertake the audit.
4. The audit will include a factory tour to review the non-conformities arisen from the part 1 audit, gather data to inform the document review and ensure that appropriate standards of GMP are maintained.
5. At the end of the audit, ACERTA will provide a written summary of non-conformities discussed in the closing meeting and detailed in the document "***Final Part of Checklist***" (exceptionally within one working days of the audit).
6. The customer shall solve the non-conformities detected at the time of the audit and define a plan to identify the root cause of the non-conformance. For this purpose, the auditor will

send the customer the ***Corrective Action Plan***. The customer shall provide the appropriate documents, together with the documentary evidence, within 28 days of the audit date.

7. In the case that the number and level of non-conformities identified at the part 1 audit would result in the failure to achieve a certificate, the existing certificate for the site shall be immediately withdrawn.

- A full final "***Audit Report***" shall be produced in the standard format that will include all details, comments, non-conformities and corrective actions identified at both the part 1 and the part 2 audits. The grade will be based upon the total number and level of non-conformities raised during both the part 1 and the part 2 audits.
- The rest of the process shall be the same as described within sections 1.4 to 1.7, within the general audit protocol with the exception that the audit report and certificate will state "Unannounced option 2".
- The new certificate will have an expiry date based on the expiry date of the previous certificate plus 6 or 12 months depending on the grade awarded. If the company decides to re-join the announced audit programme, the next audit will be scheduled to occur within the 28 days up to and including the audit due date indicated on the certificate.

1.10 GLOBAL MARKETS PROGRAMME

The BRC Global Markets programme is designed for sites which are either very small and for which the full Standard may not be appropriate or for sites which are in the development process of their food safety management systems.

Those sites interested in taking part of the BRC Global Markets programme shall inform ACERTA of their intentions through the "**Certification Request Form**". ACERTA will register the company's production site and the proposed audit date in the BRC Directory. The company shall select the level to be audited: basic or intermediate level:

1. Basic requirements – cover the minimum requirements within the BRC Standard to enable the production of safe, legal food.
2. Intermediate requirements – incorporate the basic requirements but in addition include more robust systems for food safety and product quality management from the full Standard.

Once the Company has completed its internal assessment of compliance, ACERTA will agree the date of the audit with the Company. All audits for the BRC Global Markets programme at the basic and intermediate level are announced.

The site shall ensure that the production programme at the time of the audit covers products for the intended scope of the certification. Where possible, the widest range of these products shall be in production for the auditor(s) to assess. Where the product range is large or diverse, the auditor(s) has the discretion to continue the audit until sufficiently satisfied that the intended scope of the certification has been assessed. Where a significant production process is undertaken only during a different period of the year from the audit, a separate audit will be required to assess that production method.

The company shall supply ACERTA with background information prior to the audit day to ensure the auditor(s) is fully prepared and to provide the best opportunity for the audit to be completed efficiently. This information could be:

- confirmation of the audit level (i.e. basic or intermediate)
- a summary of critical control points (CCPs)
- a simple process flow diagram or process description
- a simple site plan

- the main management contacts and positions
- the list of products or product groups included within the audit scope
- typical shift patterns
- production schedules, to allow audits to cover relevant processes (e.g. night-time manufacture or where production

processes are not carried out each day)

- recent quality issues, withdrawals or customer complaints and other relevant performance data

Audit duration

Before the audit takes place, ACERTA shall indicate the approximate duration of the audit. The typical duration of the

basic-level audit is 1 day (8 hours/day) at the site. The intermediate-level audit will typically take 1.5 days. The normal duration of audit may be altered depending on different factors defined in "**2.1.2 Audit Duration**". Any disruption of the normal duration of the audit will be justified and documented in the "**Audit Order**" and the "**Audit Report**".

The audit performance will be made by following the same guidelines and operation made in the certification / renewal audits.

Following the identification of non-conformities found during the audit, the company must undertake corrective action to remedy the immediate issue (correction). It is also strongly encouraged that an analysis of the underlying cause of the non-conformity (root cause) is undertaken to allow any preventive actions to be taken to prevent recurrence.

The process for 'closing out' non-conformities depends upon the level of non-conformity and the numbers of non-conformities identified.

Critical non-conformities

The grading of non-conformities will be reviewed by the certification body as soon as possible after the audit. Where the review confirms that a non-conformity is classed as critical, the site will be required to undertake another full audit before attainment of basic or intermediate level.

Where this occurs at a site which has previously been awarded basic or intermediate-level recognition, this recognition must be immediately withdrawn.

It is a requirement of some customers that they shall be informed when their suppliers have a critical non-conformity identified or fail to retain basic or intermediate-level recognition. In such circumstances the company shall immediately inform its customers and make them fully aware of the circumstances. Information on the corrective actions to be taken in order to address the non-conformities will also be provided to customers where required.

Major and minor non-conformities

No basic or intermediate-level recognition shall be issued until major and minor non-conformities have been demonstrated as having been corrected, either permanently or via a temporary solution that is acceptable to the certification body.

Close-out of non-conformities can be achieved either by objective evidence being submitted to the certification body, such as updated procedures, records, photographs or invoices for work undertaken, or by the certification body undertaking a further on-site visit.

Where a high number of non-conformities are identified or the type of issues identified would make it very difficult to confirm compliance through documentary evidence alone the certification body would need to revisit the site to confirm correction.

Sites that have not yet achieved basic level are allowed up to **90 days** after the audit date to correct and provide evidence of corrective action. Where sites have already achieved basic and/or intermediate level, **28 calendar days** are allowed for submission.

If satisfactory evidence of correction is not provided within the timescale an award of basic or intermediate level cannot be granted and a further audit will be required for consideration of the award of basic or intermediate level.

There is no grading of the awards of basic or intermediate level. The numbers and type of non-conformity will, however, be indicated on the audit report.

Reports

Following each audit, a full written report shall be prepared in the designated format.

Reports shall be prepared and dispatched to the company within 42 calendar days (104 days for sites that have not previously attained basic level) of the completion of the full audit.

The audit report shall be uploaded to the BRC Global Standards Directory in a timely manner irrespective of whether basic or intermediate level is attained. The owner of the audit report may allocate access to the audit report to customers or other parties in the directory.

The audit report and associated documentation including auditor's notes shall be stored safely and securely for a period of 5 years by ACERTA.

After a review of the audit report and documentary evidence provided in relation to the non-conformities identified, a decision shall be made on whether to award recognition of attainment of the basic or intermediate level. Please note attainment of a level is not certification; certification is only achieved by successful compliance with the full BRC Global Standard.

Where recognition is granted this shall be confirmed in writing by ACERTA within 42 calendar days of the audit (104 days where sites have not previously achieved recognition). The letter of recognition shall include the following details:

- company name
- address of the site audited
- scope of the audit and any permitted exclusions
- date(s) of the audit
- the level attained (i.e. BRC Global Markets basic or intermediate level)
- the name and address of the awarding certification body
- expiry date of recognition (i.e. 1 year and 42 days after the full audit date).

In order to maintain recognition at either basic or intermediate level the site shall be re-audited every 12 months. The due date of the re-audit shall be calculated from the date of the initial audit, irrespective of whether further site visits were made to verify corrective action arising from the initial audit.

The subsequent announced audit shall be scheduled to occur within a 28-day time period up to the next audit due date. This allows sufficient time for corrective action to take place in the event of any non-conformities being raised, without jeopardizing continued recognition.

1.11 VOLUNTARY MODULES

The Standard has been designed to enable the addition of voluntary modules to the routine audit. The voluntary modules will enable sites to demonstrate compliance to specific sets of requirements in order to meet specific market or customer requirements.

The certification body shall be notified in advance of the audit that a particular voluntary module is intended to be added to the scope of the audit. This ensures sufficient additional time can be scheduled and that an auditor with the appropriate qualifications for the additional module is selected. The site shall ensure that the production programme at the time of the audit covers products for the intended voluntary module where this is applicable.

When these voluntary modules are used, they will be detailed within the scope of the audit report and certificate of conformity. When the voluntary modules are not included in the audit, they do not need to be identified as exclusions, except for the module "Traded Goods". In case that a site carries out commercial activities, if the site does not select the voluntary module, it must be identified as an exclusion to guarantee it is clear for the reader of the report or certificate.

For the voluntary modules that are not accredited, ACERTA will issue an independent certificate.

Audit duration

In order for the voluntary modules to be included within the audit programme additional time will be needed for the audit. ACERTA shall indicate the expected additional time requirement for audit planning in the "**Work Order**".

Module number	Module title	Typical required duration (in hours)
8	Trade products	1
9	Management of Food Materials for Animal Feed	1
10	Global G.A.P. Chain of Custody	≥1
11	Meat Supply Chain Assurance	2 – 4
12	AOECS Gluten free food	2 – 4
14	Culture Excellence	0
15	FSMA	2 - 4
	ASDA	2 - 4

Critical non-conformities

If a critical non-conformity is identified against a requirement of the module then the site cannot be certificated for this module without a further full audit of the module.

Where this occurs at a site which already holds certification for the module, certification of the module must be immediately withdrawn. If it is a requirement of customers that they shall be informed when their suppliers have a critical non-conformity identified or fail to gain certification against a module the company shall immediately inform its customers.

Note a critical non-conformity against a requirement of a voluntary module does not necessarily prevent certification against the main Standard or other voluntary modules.

Major and minor non-conformities

A voluntary module cannot be included on a certificate until major and minor non-conformities have been demonstrated as having been corrected, either permanently or via a temporary solution that is acceptable to the certification body.

Close-out of non-conformities can be achieved either by objective evidence being submitted to the certification body, such as updated procedures, records, photographs or invoices for work undertaken, or by the certification body undertaking a further on-site visit.

If satisfactory evidence is not provided within the 28 calendar-day period allowed for submission following the audit, certification for the module will not be granted. The site will then require a further full audit in order to be considered for certification of the module.

There will be no grading of the voluntary modules. The modules will either be certificated or not.

Any non-conformities identified when assessing a voluntary module shall not be taken into account when deciding the grade for certification against the Global Standard for Food Safety.

Following each audit, a written report shall be prepared in the agreed format for the particular module and this will form an addendum to the Global Standard for Food Safety audit report. The addendum report shall be produced in English or in another language, dependent upon user needs. Where the report is produced in a language other than English, any applicable audit summary sections shall, in addition, always be reported in English.

The report addendum covering the requirements for the voluntary module shall be prepared and dispatched to the company within 42 calendar days of the completion of the full audit.

The full BRC audit report together with the addendum for the voluntary module shall be uploaded to the BRC Global Standards Directory in a timely manner irrespective of whether a certificate is issued. The owner of the audit report may allocate access to

the audit report with addendum to customers or other parties in the directory.

1.12 SUSPENSION OR CANCELLATION OF THE CERTIFICATION

The certificate may be withdrawn by ACERTA due to:

- ✓ evidence that the site no longer complies with the requirements of the Standard, raising significant doubt of the conformity of the products produced
- ✓ failure to implement adequate corrective action plans within appropriate timescales
- ✓ evidence of falsification of records.

In the event that certification is cancelled or suspended by ACERTA, the company shall immediately inform its customers and make them fully aware of the circumstances relating to the cancellation or suspension. Likewise, information on the corrective actions to be taken in order to reinstate certification status will also be provided to customers.

I. Definitions:

SUSPENSION OF CERTIFICATION**:** **"**It is the deprivation, by the company, of the right to use the certificates, logo and trademark for a specific time period, due to any change or deviation detected in relation to the products, quality system or the own company. The producer will be prevented from using the logo/trademark, Licence/certificate or any other type of document that has any relation to BRC until the situation which has caused the suspension is solved within the time period set ACERTA (see table with the causes of suspension and cancellation of the certificate)".

If the deviation has been caused by the own company, this shall demonstrate that the deviation has been solved, if possible, without a follow-up visit by ACERTA, and always within a reasonable time period.

CANCELLATION OF THE CERTIFICATION: "It is the complete cancellation or invalidation of a certificate granted to a company, due to different causes, being these motivated by the own producer or by other reasons beyond his/her control. Some causes of cancellation of the certification are: shutdown of the company, change of activities, drastic changes to normative documents, company's express desire, expiration of the certificate, etc."

Besides what is described in this section, ACERTA shall suspend or cancel the certification in the following cases:

Table with the causes of suspension and cancellation of the certificate		
Cause of the suspension	**Maximum period of suspension(*)**	**Cause of the cancellation**
S1. The certification renewal inspection is delayed, in an unjustified way, more than 1 month from the previous inspection audit date.	3 months	C1. The cause of the suspension is not solved before the period of time allowed ends.
S2. The contracting party neglects to pay the economic agreements signed with ACERTA.	3 months	C2. The applicant does not comply, in a persistent way, with the economic agreements signed with ACERTA.
S3. Abusive misuse of trademarks. Non-fulfilment of what is established in the User guidelines for BRC Trademark and logo.	3 months	C3. Recurrent abusive use of BRC Trademark.
		C4. The company has intentionally provided ACERTA with false information.
		C5. A misuse of the certificate is verified. For example, it is linked, in case of product certificate, with a quality system or other products which are not certified.
S4. Non-fulfilment of obligations derived from the contract signed with ACERTA, or, acting, in any way, against ACERTA.	3 months	C6. Acting against ACERTA insterests in a fraudulent way, recurrent non-fulfilment of the obligations derived from the contract signed with ACERTA, or when the cause of the suspension has not been solved before the period of time stipulated for that purpose.

(*)ACERTA reserves the right to establish shorter periods of time for solving the causes of suspension.

1.13 COMPLAINTS, APPEALS AND LAWSUITS

For the purposes of this document, the following definitions are established:

COMPLAINT: Act by which a natural or legal person states his/her disagreement with ACERTA's procedures in any issue related to its activity (administrative, economic, technical, etc).

APPEAL: Act by which a natural or legal person states his/her disagreement with a decision made by ACERTA.

LAWSUIT: Act by which a natural or legal person, or even ACERTA, decides to settle the resolution of any discrepancy to the arbitration of a third party.

Complaints: Any natural or legal person will be the right to issue a complaint against ACERTA. The complaints may be communicated oral or in writing. In both cases, ACERTA shall document it in the corresponding Complaint Form. The complaint will be internally assessed by ACERTA.

Initially, the applicant will be informed of the decisions adopted within 10 calendar days from the reception of the complaint; a written answer shall be sent within 30 calendar days from the reception of the complaint.

Appeals: Any customer or applicant for certification has the right to give notice of appeal against the decisions adopted by ACERTA.

All appeals shall have to be communicated in writing within 7 calendar days from the reception of the certification decision. Appeals will finish within 30 calendar days from the reception date. One a detailed and thorough investigation has finished, the definitive answer will be communicated in writing.

Lawsuits: In order to solve the lawsuits arising in connection with the certification or any other activity between ACERTA and other party, these will be ruled by arbitration of the Madrid Chamber of Commerce and Industry, by one or more arbitrators to be appointed in accordance with those rules.

Note: The change notification of requirements certification is done through the website ACERTA: www.acerta-cert.com.

1.14 PROCEDURES FOR HANDLING NON-CONFORMITIES AND CORRECTIVE ACTIONS

1.14.1 Critical or Major non-conformity against "fundamental" clauses

When ACERTA has identified a **critical or major non-conformity** against the statement of intent of a "fundamental" clause at an **initial audit**, the company shall not gain certification. If a critical non-conformity is found at a **subsequent audit**, certification shall be **immediately suspended**.

In either of the above cases, this results in the certification no granted ("No Grade" wil be detailed in the report) and a **further full on-site audit** shall be carried out to verify that appropriate corrective actions have been implemented and there is demonstrable evidence of compliance.

Furthermore, the customer shall be immediately informed of these circumstances and about the corrective actions to be taken in order to achieve certification.

1.14.2 Critical non-conformities against the "Statement of intent" of a non-fundamental or any clause

When ACERTA has identified a critical non-conformity against a "Statement of intent" of a non-fundamental or any clause of the standard, the same procedure described in section 3.3.1 shall be followed.

1.14.3 Major non-conformities

When ACERTA has identified a Major non-conformity against the "Statement of intent" or a clause, no "***Certificate of conformity"*** shall be issued until major non-conformities have been demonstrated as having been corrected.

The customer shall submit the corrective actions (including the root cause) within **28 calendar days** from the day of the audit. ACERTA shall verify that the correctives actions have been implemented and are effective. This assessment will be made either from objective evidence sent by the customer, like, e.g. updated procedures, records, photos or invoices for works undertaken, etc, or by a further on-site visit by ACERTA.

If there is no formal commitment to implement corrective action received by ACERTA within 28 calendar days post-audit period, or if there is a failure to meet the timeframes proposed in the non-conformity summary sheet without justification, the company **shall be excluded from the certification programme**. The company will then require a further full audit in order to be considered for certification.

1.14.4 Minor non-conformities

When ACERTA has identified a Minor non-conformity against the "Statement of intent" or a clause, no "***Certificate of conformity***" shall be issued until minor non-conformities have been demonstrated as having been corrected.

The customer shall submit the corrective actions (including the root cause) within **28 calendar days** from the day of the audit. ACERTA shall verify that the correctives actions are implemented and effective. This assessment will be made either from objective evidence sent by the customer, like, e.g. updated procedures, records, photos or invoices for works undertaken, etc, or by a further on-site visit by ACERTA.

Where documentary evidence is provided, absolute verification may be left until the next audit. At the subsequent audit, if verification cannot be confirmed, then a non-conformity may be raised and elevated to a **major non-conformity**.

CLASSIFICATION CRITERIA, TIME SCALES FOR SUBMITTING CORRECTIVE ACTIONS AND AUDIT FREQUENCY:

Grade	Critical or major non-conformity against the "statement of intent" of a "fundamental" requirement	Critical	Major	Minor	Corrective action	Audit frequency
AA / AA+				5 or fewer	Objective evidence within 28 calendar days	12 months
A / A+				6 to 10	Objective evidence within 28 calendar days	12 months
B / B+			1	10 or fewer	Objective evidence within 28 calendar days	12 months
B / B+				11 a 16	Objective evidence within 28 calendar days	12 months
C / C+				17 a 24	Objective evidence within 28 calendar days	6 months
C / C+			1	11 a 16	Objective evidence within 28 calendar days	6 months
C / C+			2	10 or fewer	Objective evidence within 28 calendar days	6 months
D / D+				25 a 30	Revisit required within 28 calendar days	6 months
D / D+			1	17 a 24	Revisit required within 28 calendar days	6 months
D / D+			2	11 a 16	Revisit required within 28 calendar days	6 months
Not certificated	1 or more				Certificate not granted. Re-audit required (re-audit shall not take place any earlier than 28 days from the audit date, although there may be some exceptions)	Certification not granted
Not certificated		1 or more			Certificate not granted. Re-audit required (re-audit shall not take place any earlier than 28 days from the audit date, although there may be some exceptions)	Certification not granted
Not certificated				31 or more	Certificate not granted. Re-audit required (re-audit shall not take place any earlier than 28 days from the audit date, although there may be some exceptions)	Certification not granted
Not certificated			1	25 or more	Certificate not granted. Re-audit required (re-audit shall not take place any earlier than 28 days from the audit date, although there may be some exceptions)	Certification not granted
Not certificated			2	17 or more	Certificate not granted. Re-audit required (re-audit shall not take place any earlier than 28 days from the audit date, although there may be some exceptions)	Certification not granted
Not certificated			3 or more		Certificate not granted. Re-audit required (re-audit shall not take place any earlier than 28 days from the audit date, although there may be some exceptions)	Certification not granted

Note that shaded cells indicate zero non-conformities.