



NSF CERTIFICATION UK SERVICE PROTOCOL

For Certification against the BRC Global Standard for Food Safety, Issue 8, August 2018

1. Application

All applicants to the NSF Certification UK scheme for this BRC Standard are required to complete the NSF Certification UK BRC Scheme application form for each audit. The application form also asks for an undertaking that the applicant will abide by the NSF Certification UK scheme rules "Certification Scheme Regulations Governing Accredited Certificates which must be adhered to. These can be found via the NSF Certification UK website link:

<http://www.nsfinternationalfood.co.uk/about-us/certification.php>

2. Arranging Assessments Visits

Assessments are conducted at a mutually convenient date. The audit frequencies and the method of demonstrating correction of non conformities are based on the number and type of non conformities found at the audit. Documentary evidence can be accepted where up to 24 minors, 1 major and up to 10 minors non conformities are found, for higher numbers a revisit, an Enrolment Scheme score or a full re-audit after a period for improvement is required. Audit frequencies are either 6 or 12 months in line with performance. An assessment is typically 2 – 3 consecutive days but certain factors can necessitate an increase or decrease in the duration of the evaluation. The time required will be assessed based on the information provided in the application form using the BRC audit duration calculation and discussion in line with guidance contained in the BRC Standard.

50% of audit duration is typically spent in production areas and site facilities, interviewing staff, observing processes and reviewing documentation in production areas with the relevant staff. However, it is recognised, that in simple operations, the time required may be less than 50% of the audit. In these circumstances the amount of time spent in production and site facilities can be reduced, but the expectation is that at least 30% of the audit (5 hours minimum), will still be spent in these areas. Where the size of the site is larger than 50 employees and 10,000 square metres then an increased proportion of the time allocated to the audit will be spent within these areas.

Reduction in duration is not allowed prior to the audit, unless a site is exceptionally small, a shorter audit duration may be applicable. In this situation the site must meet all of the following criteria:

- There is only one, simple production process (for example, a small produce pack house, packing whole, fresh produce)
- The main shift consists of 5 or less employees
- The size of the manufacturing facility is 5k sq. m or less

In these circumstances an audit duration of 12 hours may be applied.

If additional storage facilities, locations or head office assessments are included within the audit process, then additional time shall be allocated for this over and above that indicated by the audit calculator.

In the event that the audit against the Standard includes modules or is intended to be combined with other audit standards, the total audit time will need to be appropriately extended. Details of combined audits shall be specified on the audit report.

The calculation for audit duration shall determine the amount of time the audit is expected to take at the site. Additional time will be required for the review of any documentary evidence provided and completion of the final audit report.

Deviation from the calculated audit timeframe must be justified and specified on the audit report, even if there is difference of only 1 hour in either total time or time in production/ facility areas.

For seasonal sites (site that is opened specifically to harvest and process a product for the duration of the short term of that harvest (typically 12 weeks or less) during a 12-month cycle), the scheduling of audits needs to be carefully planned so that:

- Certification does not lapse. Where the product harvest is dictated by weather and this affects the actual audit date (e.g. the season is later than expected), there is no penalty for a delay to the audit, although justification for this delay must be included in the audit report
- The site is in production, so that all of the requirements of the Standard can be assessed
- There is a minimum of 1 week's production records for the auditor to review.

Sites currently certificated under unannounced scheme or sites wishing to join unannounced scheme can nominate 15 days when they are not available for an audit. The dates and the reasons must be provided within 3 months of opting into the programme. At the discretion of NSF Certification UK, other unavailable dates may be accepted when provided at least 4 weeks in advance of the next unavailable date. NSF Certification UK may challenge the reason where this does not appropriate and at its discretion accept these nominated dates.

Days when the factory is not operating (e.g. weekends, public holidays, and planned shutdowns for site holidays or maintenance) are not included within the 15 days. Any such non-production days shall be notified to NSF Certification UK when opting into the unannounced scheme.

3. Certification Charges and Invoicing

Assessment charges are calculated after consideration of the size, type and location of the operation. A typical assessment takes 2 to 3 consecutive days to complete, with a further day for report writing. Travel to and from assessments will be charged at the current mileage rates and will be declared on any quotes. Overnight expenses are charged at cost. All assessment charges are agreed with the client and confirmed in writing. Normally the client is invoiced after completion of the assessment. In addition to the costs for the assessment the BRC charge an administration fee for each assessment. This charge will be shown separately on your invoice and is paid directly and in full to the BRC by NSF Certification UK.

BRC annual administration fee includes a single license for both BRC Participate and BRC Global Standards Professional per site. In order to obtain the access, site should contact BRC global Standards directly.

4. Cancellation of Assessment Visits

In the event a client wishes to cancel or postpone an assessment visit, written notification must be sent to NSF Certification UK at least ten working days prior to the date the assessment visit is due. In the event that an assessment visit is cancelled or postponed NSF Certification UK reserves the right to charge the client a cancellation fee as follows:

- ◆ Cancellation/postponement within 10 working days of the assessment date – 50%, within 5 working days 75 % and if on the day of assessment – 100% of the full charge

It is a condition of electing to join the unannounced audit programme that the auditor shall be granted access to the site for the audit on arrival. If access is denied, the site will be liable for the auditor's costs and will revert to the announced audit scheme. At the discretion of NSF Certification UK, the existing certificate may also be suspended or withdrawn.

5. Scope of Assessments

The scope of the assessment will be defined with the client prior to undertaking the assessment (application) and reconfirmed at the opening meeting.

The audit scope and any permitted exclusions shall be clearly defined both on the audit report and on any certificate issued. The wording of the scope will be verified by the auditor during the site audit. The wording of the scope, of the product groups and the packaging format, shall enable a recipient of the report or certificate to clearly identify whether the products supplied have been included within the scope.

Products purchased for resale by a site ('traded products') or key outsourced processes will be clearly identified in the scope of the certificate.

Exclusions are only allowed by exception and they should be agreed with NSF Certification UK prior to the audit. It is not possible to exclude either parts of the process undertaken at the site or parts of the Standard. Where exclusions are accepted, the auditor shall assess any hazards presented by excluded areas or products (e.g. the introduction of allergens or foreign-body risks) and non-

conformities may be raised relating to the excluded area where this poses a risk to the products within the audit scope.

Products purchased for resale by a site (i.e. traded products) can form an agreed exclusion and therefore the requirements of section 9 will not be applicable. It should be noted that the BRC Global Standards 'food' logo cannot be used for promoting traded products even when they form part of the certificated scope.

The audit scope is expected to be site-specific. There are, however, exceptional circumstances where activities that are undertaken at more than one location can be included within a single report and certificate. These include:

- the audit of a head office to review procedures controlled from head office
- the audit of more than one location where a single production process is carried out across two sites.

While storage facilities on the same site as the production facility shall always be included within the audit of the site, it is not uncommon for sites to also own additional off-site storage facilities. Where additional storage facilities are owned and managed by the company in the vicinity of the production site (i.e. within a radius of 50 km), these shall be identified on the audit report and either audited as part of the site audit or specifically excluded.

In addition to the core Standard, BRC Global Standards will develop a range of modules which may apply only to particular types of operation (e.g. sites producing gluten-free products) or may look in greater depth at a particular market concern. These modules are designed to reduce multiple audits or to meet specific geographic or customer requirements. Where such modules are undertaken, they are subject to separate specific protocols.

For seasonal sites the scope of the certification may include a variety of products where these can be 'grouped' because they use the same processing systems. For example, the audit may be undertaken during the harvest of apricots, but certification could include other stone fruits that are known to be packed at the site at the time of the audit. Where products are packed during different seasons, the audit will take place during one season so that the auditor can assess the good manufacturing practice requirements of the Standard. During the audit, the auditor will also review documentation and/or traceability associated with both the product currently in production and those produced in different seasons.

6. Preparation for the Assessment

Prior to each assessment the operation should be reviewed in relation to the requirements of the Standard with a view to making any necessary amendments or improvements to the operation and systems. It is the supplier's responsibility to ensure that they are using the most up to date issue of the BRC Standard. It is important that the activities to be certified are in operation at the time of the assessment and this will be discussed when arranging the assessment. If particular operations such as loading occur at night or early in the morning it may be necessary for the assessment to occur at this time.

The site shall make the previous year's audit report and certificate available to NSF Certification UK, when moving from another certification body.

For seasonal sites it is assumed that the site is not operational 'out of season' and therefore the requirements of the Standard concerning specified meetings or audits which would normally occur at monthly or quarterly intervals throughout the year would not be appropriate during the out-of-season period. However, as a general principle, the site must be able to demonstrate that these activities have taken place in a timely manner (i.e. before the start of the season and at appropriate regular intervals during the season). Sites will need to consider the timing of these activities so that actions, targets or objectives can be completed within meaningful timescales. A schedule must be in place and records available to demonstrate the outcomes.

For site currently certificated under unannounced scheme, it shall notify NSF Certification UK within 3 months of the last audit date of its intention to remain within the unannounced audit programme. Non-certificated sites may opt into the unannounced audit programme on the understanding that the audit may not occur for up to 12 months from the request.

7. Assessment Process

Assessments will usually be conducted in English or local language, where an auditor is available with the appropriate competency and language. Assessments consist of six elements:

- Opening meeting; inspection of the operations – typically 50% of audit duration (incl. staff interviewing, observing processes, reviewing documentation in production areas); document review including HACCP and hazard and risk analysis and quality management systems; traceability challenge, label review; close out of audit trails, verification and further documentation checks; final evaluation of findings by the evaluator in preparation for the closing meeting; closing meeting.

Sites opting for the unannounced audit programme shall be obliged to accommodate the auditor and allow the audit to start immediately on arrival at the site. The audit process will follow the same procedures as outlined for an announced audit. There will be a short opening meeting, after which the site production facility inspection will be expected to commence within 30 minutes of the auditor arriving on site.

It is expected that at the opening and closing meetings those attending on behalf of the company will be senior managers who have the appropriate authority to ensure that corrective action can be progressed, if non-conformances have been identified. It is expected that the most senior operations manager on site at the time of the audit or their nominated deputy are available for the audit and attend both opening and closing meeting.

The assessor will prepare a copy of the assessment summary and non-conformances, which are left with the company's technical representative on the day or in exceptional circumstances provided within 1 day of the assessment. The decision to award certification has to be taken independently of the auditor following a review of the assessment report and any follow up visit or documentary corrective action evidence and root cause analysis provided. This is undertaken independently by NSF Certification UK Managers.

At the closing meeting the auditor(s) will provide the site with an explanation of the BRC Global Standards Directory, which allows secure access to audit data to both the client and their nominated customers, the BRC Global Standards compliance programme, and the feedback systems available to communicate with the NSF Certification UK and BRC Global Standards.

8. Assessment Reports

Following each audit, confirmation of completion will be available on the BRC Global Standards Directory within 10 calendar days. Details will include the date of the audit, the audit scope and the non-conformities found. No audit grade will be included since the certification details, including the details of the non-conformities, will be under independent technical review prior to confirmation.

9. Corrective Action Assessment

In order for a certificate to be issued it is necessary for all non conformances to be closed and the appropriate documentary evidence provided to NSF Certification UK or available for a revisit (grade C, C+ with 2 major non-conformances, D and D+) to enable this to be verified **within 28 days** of the assessment.

It is recognised that for seasonal sites with very short seasons (i.e. less than 4 weeks), it may not be possible to close out identified non-conformities within the season. However, where major non-conformities are identified, these must be resolved before the end of the season or within 28 calendar days of the audit if the site is to gain certification. Where minor non-conformities cannot be closed out within the season, they may be accepted by NSF Certification UK if a suitable action plan is provided. These actions will be assessed prior to the beginning of the next season and verified at the next audit. Any non-conformities that are not adequately closed out by the next audit will have the potential to be raised as non-conformities against management commitment. This will apply whether the certificate has lapsed or not. Where a seasonal site is awarded a grade C, C+, D or D+, it is likely that the site will not be in production when the next audit would normally fall 6 months later. In such circumstances, the next audit shall take place as soon as production has started in the new season. In this situation, the site may be required to agree a course of action with its customers, since it will not be certificated at the beginning of the season, until the scheduled re-audit has taken place. Under no circumstances will the validity of the certificate be extended.

Non-conformities are verified by a technical review process by the NSF Certification UK scheme management. If the review results in a change in the number and/or severity of non-conformities, the site shall will be notified.

Reports, corrective actions and root cause analysis where applicable are included in the decision to award a certificate.

10. Distribution of Assessment Reports

The report is despatched to the client usually within 42 days of the assessment date. The person paying for the assessment is regarded as the customer. As such, it is this party that receives the assessment report. Reports are also uploaded to the BRC database, irrespectively if certificate is issued and will only be made available to BRC members when permitted by the owner of the report. NSF Certification UK will also retain a copy of the report and the information on which a certification decision is based for a period of 5 years.

11. Certificates

Certificates will be issued to clients who meet the requirements of the standard and in accordance with the requirements of the BRC Certification protocol. The certificate remains the property of NSF Certification UK and is issued subject to the client complying with the Rules Governing Certification. The certificate and audit report will not be valid until the service fee (BRC administration fee) and NSF Certification UK audit fees have been received, irrespectively of the outcome of the certification process.

12. Maintaining Certification

It is the client's responsibility to maintain certification, except in the case of unannounced audits. In such case, it is the responsibility of NSF Certification UK to ensure that the audit is undertaken within the certification window so that the late audit non-conformity clause (1.1.10) shall not apply.

If the site wishes to withdraw from the unannounced audit programme, the next audit will be scheduled to occur within the 28 calendar days up to and including the anniversary of the last audit date; this ensures that the maximum time between audits is not more than a year.

For announced audits, when the delayed beyond the due date, except of justifiable circumstances a major non-conformance will be assigned. Justifiable circumstances must be documented within audit report. Those are:

- situated in a specific country or an area within a specific country where there is government advice not to visit and there is no suitable local auditor
- within a statutory exclusion zone that could compromise food safety or animal welfare
- in an area that has suffered a natural or unnatural disaster, rendering the site unable to produce or the auditor unable to visit
- affected by conditions that do not allow access to the site or restrict travel (e.g. heavy snow)
- producing seasonal products where production is delayed by a late start to the seasons (e.g. due to weather or product availability).

In some circumstances it is possible to undertake the audit earlier than these due dates; for example, to reset the audit dates to allow combined audits with another scheme, or to include a product produced during a different season. Where an audit date is brought forward, the following rules apply:

- The audit report will detail the reasons why an audit has been brought forward
- The next audit due date will be 'reset' at 12 months (or 6 months depending on grade) from this 'new' audit date
- The certificate (should it be issued) shall have an expiry date of 12 months (or 6 months, depending on grade) + 42 calendar days from the new audit date.

Moving the audit date to a more 'acceptable' later date for reasons of combining audits, lack of personnel or undertaking building work are not acceptable reasons for missing the due date.

It is not a justifiable reason to delay audits where sites are not in full production; however, audits must be undertaken while products are being manufactured.

For seasonal production sites there may be circumstances where the frequency of audits is reduced, occurring at intervals of more than 12 months. The on-site audit date will be dictated by product harvest, which may be affected by the weather. The certificate expiry dates in these circumstances will be controlled by the actual audit date rather than the anniversary of the initial audit date. Justification needs to be included on the audit report.

The unannounced audit due dates for some sites producing seasonal products may occur towards the beginning of the product's season and this could limit the dates available to carry out unannounced audits before the end of the re-audit window. Therefore, in the first year that the site is within the unannounced programme, the audit window will be extended to allow the unannounced audit to be carried out up to 6 weeks after the audit due date. There will be no penalty for late audits.

The issue of the certificate provides an assurance to customers that NSF Certification UK has assessed the certified site and is satisfied that the requirements of the Standard have been met through the assessment and any corrective actions and that processes are in place to ensure that the Standard is maintained for at least the duration of the certificate. It is important therefore for the integrity of the Standard that in the event that I

- legal proceedings with respect to product safety or legality, or that which significantly affects the operation of the site
- enforcement by authorities related to product safety or legality (e.g. an enforcement notice)
- product recalls since the last BRC Global Standards audit, any significant public food safety incidents, or any significant regulatory food safety non-conformities
- significant damage to the site (e.g. natural disaster such as flood or damage by fire)
- change of ownership (see glossary)
- any significant change to the operation or scope

NSF Certification UK in turn will take appropriate steps to assess the situation and any implications for the certification, and shall take appropriate action. Information shall be provided by the site on request so that an assessment can be made as to the effect on the validity of the current certificate NSF Certification UK may, as appropriate:

- confirm the validity of certification
- suspend certification pending further investigation
- require further details of corrective action taken by the site
- undertake a site visit to verify the control of processes and confirm continued certification
- withdraw certification
- issue a new certificate with the new owner's details.

All changes will be reflected within BRC Directory.

13. Extension to Scope

Once certification has been granted, any additional significant products manufactured or processes undertaken by the site, which are required to be included in the scope of certification, must be communicated to NSF Certification UK, that will assess the significance of the new products or processes and decide whether to conduct a site visit to examine the aspects of the required extension to scope.

A revisit is required before granting a scope extension in the following circumstances:

- inclusion of manufacturing facilities not taken into account in the original audit
- inclusion of a new processing technology (e.g. canning of low-acid products where formerly only high-acid products were within scope)
- inclusion of new products which introduce a significant new risk to the facility (e.g. addition of a nut-based product to a previously allergen-free site).

A revisit is less likely where new products are extensions to the existing ranges produced on existing equipment. Where an extension to scope is required shortly before the certificate is due to expire, it may be more appropriate to undertake a full audit and issue a new certificate.

When a revisit is considered necessary, the duration of this visit will vary depending on the aspects to be examined for the required extension to scope. The site visit should be conducted along the same principles as the original audit (i.e. including an opening meeting, inspection of the operation

of the process, documentation trails and closing meeting). The revisit should be announced, irrespective of whether the site is certificated to the announced or unannounced programme. Identified non-conformities should be documented and actioned within the normal protocol of the Standard. The additional non-conformities raised at the site visit will not affect neither the current certificated grade nor continued certification. However, if practices are seen that give the cause to doubt continued certification (e.g. the identification of a critical non-conformity) then NSF Certification UK will arrange a full re-audit of the site.

In these circumstances the current certificate shall be withdrawn.

A visit report should be documented, but shall not be in the format of an audit report. A short explanation of the nature of the visit, what was audited and the conclusions should be given. The visit report should document what controls are in place and confirm the effectiveness of these controls. It should be clear in the report what aspects were looked at and what was excluded.

The site's current certificate will be superseded by any new certificate issued. The certificate must use the same expiry date as detailed on the original certificate. The due date of the next full audit will therefore remain the same. The grade shall also remain the same.

The certificate will include identification that it was a scope extension and the date of the visit.

14. Complaints and Appeals and Certificate Withdrawal

NSF Certification UK operates a documented complaints and appeals procedure as part of the quality system. It can be made available to site on request.

Complaints and appeals must be made in writing by named person(s) and addressed to the Quality Manager, NSF Certification UK Ltd, Long Hanborough, Oxon, OX29 8SJ.

The site has the right to appeal the certification decision made by the NSF Certification UK and any appeal should be made in writing within 7 calendar days of receipt of the certification decision latest. Appeals will be finalized within 30 calendar days of receipt. A full written response will be given after the completion of a full and thorough investigation into the appeal.

In the event of an unsuccessful appeal, NSF Certification UK may choose to charge costs for conducting the appeal to the site.

The certificate may be withdrawn by NSF Certification UK in a number of circumstances where the site may no longer comply with the requirements of the BRC Global Standards certification scheme and ISO/IEC 17065. Should decision on withdrawal be made in agreement with BRC global Standards, the site will be informed in writing. The site records in BRC Directory will be also amended accordingly.

In the event that certification is withdrawn or suspended, the site shall immediately inform its customers and make them fully aware of the circumstances relating to the withdrawal or suspension. Information on the corrective actions to be taken in order to reinstate certification status should also be provided to customers.

15. Providing feedback to BRC Global Standards

Site audited against the Standard may wish to provide feedback to the BRC Global Standards on the performance of the auditor. Such feedback sent to BRC Global Standards will be considered in confidence. Feedback provides a valuable input to the Global Standards monitoring for NSF Certification UK performance. All audited sites are invited to complete a feedback survey which is treated confidentially by BRC Global Standards. It can be completed online on the website www.brcglobalstandards.com at any time.

16. BRC Logo

Companies that achieve certification and have no exclusions from their scope are qualified to use the BRC Global Standards food logo on site stationery and other marketing materials. Note that the food logo shall not be used in promoting products purchased for resale by a site (traded products).

Information and conditions relating to the use of the Global Standards logo is available at www.brcglobalstandards.com

If a site is no longer certificated because of certificate expiry, withdrawal or suspension, it shall no longer use the logo or certificate claiming certification.

The BRC Global Standards logo is not a product certification mark and no reference to BRC Global Standards may be used on products or product packaging. Any certificated site found to be misusing the BRC Global Standards name will be subject to the BRC Global Standards complaints/referral process and may risk suspension or removal of its certification.

The BRC Global Standards logo may not be used by companies that do not include all products within the audit scope.

17. BRC Directory

The BRC Global Standards Directory (www.brcdirectory.com) is the database of all audits conducted against a BRC Global Standard, all certification bodies, all auditors and all recognized audit categories.

The directory holds full copies of all audit reports in read-only PDF format. This includes archived audit documents from 2008 onwards.

NSF Certification UK is responsible for maintaining site name, address, and audit content and certificate status. All certification bodies are assessed and graded by BRC Global Standards on how quickly and accurately they update their audit data.

Audit reports can only be accessed following secure sign-in.

The directory also features a publicly accessible search function which displays only certification data. The public directory lists currently certificated sites, not those expired or withdrawn. If site wishes to withdraw from public listing, NSF Certification UK should be informed in order to be able to undertake appropriate actions.

The directory allows audit owners to share their audit reports with customers, including retailers, manufacturers, suppliers and other specifiers. When audit-sharing is set up, customers can access full current, archived and future audit documents (as they become available) without any further administration.

A site can cancel sharing at any time – NSF Certification UK should be notified. All sharing changes take immediate effect. Audit documents shared in the directory cannot be edited or doctored by the audit owner. As such, audits obtained via the directory can be considered as complete and authenticated.

Each audited site is allocated a unique reference number known as a site code. This can be used to authenticate the validity of any certificate. A site code is created when a site is audited for the first time and remains unchanged regardless of subsequent auditing certification bodies or audit status. The listing for any certificated site can be located in the public directory by adding the site code to the 'Site Code' search field. If no results are returned for a search, contact BRC Global Standards to confirm certification authenticity.

The directory notifies audit owners, and anybody who has shared access to the audit, if a site's certification is suspended, withdrawn or expires without replacement. Notifications are via automated email and can be turned off if not required.

