Q&A Responses

Can I ask as a consultant I am unable to access participate as this can only be accessed via a site? Are there plans to change this please?

BRCGS Participate is an information management system that holds all BRCGS technical content and is available to all sites operating to one of our global standards as part of our annual service package. Consultants do not have access to this platform but can download all our core standards for free on the Bookshop.

Do you think the allergen recalls because companies are not aware of the allergen awareness or could it be deliberate?

It is more likely that these are mistakes due to employee awareness. Companies want to make sure that employees handling or involved with allergen ingredients have documented education regarding allergen food safety. Even so, employee turnover, changes in the production process or changes in formulation may lead to errors. We hope that intentional adulteration is a less likely cause, but there have been alleged incidents of economic adulteration in the past (e.g. peanut shells ground in with cumin). This is the reason why companies also need to have a robust food defense/food fraud program.

In order to ensure no cross contamination, costs for crating products increase. How do you reduce costs?

When a new allergen ingredient is introduced or a new product is developed with an allergen that is not frequently used, we rely on scheduling to minimize line disruption. However, we also make sure that our leadership team understands that cleaning between different allergens is a cost associated with food safety for our products, customers, and consumers.

How do you deal with allergen information coming from spices? To how many levels of depth do you go in terms of agricultural practices for spices? Spices coming from country like India have had incident, cumin for example.

We have a very detailed supplier approval process and FSVP process. As the spice origin becomes more complex, such as with blends with ingredients from multiple countries, the process becomes more involved. We rely heavily on our suppliers, but we also use a system called "Horizon Scan" (web-based subscription) which helps us to research potential ingredient risk. Another subscription is Rapid Alert System for Food and Feed (RASFF). You can also use google.com/alerts to receive food fraud information. You must use very specific wording.

After each allergen cleaning how do you verify the cleanliness? Visually, ATP, Allergen swabs?

We do not do this daily; it is more plant and product specific. But it is never less than weekly for each line.

How often do you validate with ELISA Kits? And how often verification? Do you validate in house or through external lab?

Our process is to validate the sanitation process annually for each different allergen. We use ELISA kits where they are available for specific allergens. Where they are not available, we use a 3rd party lab. We will re-validate if new production equipment is introduced that may change the sanitation process if an allergen is introduced or if the cleaning procedures go thorough a major change. On a regular basis, between validation, we verify sanitation using protein detecting swabs. These are not allergen specific but can let us know if a protein is present.

Do you think labelling should be clearer for the public to understand the risks?

Labeling requirements (e.g. FALCPA) make requirements very clear for labelling of food allergens. This includes listing the ingredient name and the allergen if the common name does not make this clear (e.g. edamame = soy, casein = milk). It would be helpful to align USDA and FDA labelling requirements so that both include a "Contains" statement after the Ingredient statement to all out the allergen ingredient. This could be a slippery slope if not done very carefully. The messaging needs to be clear across all food labelling industries. It can get confusing, and consumer loses trust fast. Consolidation like Mike states of the

USDA and FDA and reviewed annually by a Task Force could improve clarity. Simpler labelling appeals to the consumer not more, less is more.

What is your opinion on equipment testing vs finished product testing for allergens?

It is preferable to conduct testing on equipment, by validation or verification of sanitation, versus product testing. Testing equipment can be viewed as "preventive" versus "detecting" potential allergen in completed finished product. The finished product will have to be held pending results, making it not available for customers, possibly decreasing shelf life and increasing storage cost.

Testing finished product for allergens could potentially open many issues for the food business und the current state. Any testing needs to be well thought out, evaluated, and measured for accuracy prior to implementing one would have to ask the question, why test, and what will you do with the data?

What do you see are the food trends going forwards?

Because the consuming public continues to request new, different, and exciting foods, this will likely increase the introduction of allergen ingredients into the process. This will require that manufacturers have a very science/risk-based allergen management program to prevent the introduction of undeclared allergens or mislabeling of product.

Don't you think that the first step to have a good food safety culture is by showing example from upper management that can show and express the necessity of great food safety culture? This can obviously be more difficult during pandemic time. How do you do that effectively for QA personnel or management working remotely?

Yes, management commitment is very important as a first step. During Covid-19 maintaining culture is especially challenging but also vital for product safety, health & safety and for staff well-being (although only product safety is within the scope of the BRCGS standards). Senior management commitment and good company communications are going to be important starting points.

COVID-19, may have impacted on the implementation of the culture plan, can the COVID- 19 response plan be taken into account when auditing this?

Yes, a review of the culture development plan and timescales may be necessary. Although it should not be abandoned entirely. Culture is extremely important for both product safety

and also for health & safety and is therefore vital now. It may also be necessary to consider some different activities, for example, is stage are working remotely then communications and involving them is going to present unique challenges. Ensure and amendments to the plan are clearly documented.

Will Food Safety culture be added to Agents and Brokers on the next version?

Yes! Product safety culture is part of the GFSI Benchmark 2020 and will be added to all benchmarked standards before the end of 2020.

Regarding the disinfection of food containers and packaging, what recommendations do you make? FDA.

We cannot recommend specific disinfectants or frequencies of clearly. Sites should consider – relevant legislation, conversation with suppliers, risk assessment of key areas and equipment, etc.

For plants that use outside auditors for their Internal Audits, is there some relief for frequency due to COVID-19?

There is an article on our website explaining this. Internal audits are a vital part of the sites management processes for ensuring product safety, and therefore should not be cancelled or postponed with careful consideration. We recommend that sites review their intended program and confirm which audits relate to vital systems which would have a significant impact on the site if they go wrong. These audits should be prioritised. Remaining audits within the program (less vital systems) could be rescheduled for more convenient times. Some sites have explored the use of remote technology for document/record audits.

If internal audits were handed out and scheduled, and then Covid-19 hit, we allowed for extensions for the managers completing the audits. We didn't think it was reasonable to tell them they had to leave their already short-staffed lines to complete an audit. We felt like we would get the most in depth audit if we gave extensions. Is this justifiable with the current conditions of plants?

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Are there future plans for BRCGS auditors to actually audit personnel behaviour/FS Culture in addition to the plan and reporting processes?

There are not any plans at the current time. Actual culture is very different to measure objectively during an audit. We will continue to monitor developments and understanding about culture as this area continues to evolve. In addition to auditing, BRCGS does have a Culture Excellence Module and assessment for any sites that would like it (details on our website).

What evaluation methodologies can I use to measure the quality culture of my facility?

There are lots of methods available. Information is given in our guidance, on our website.

This presentation on NC's is crucial to our continuous improvement and an invaluable tool for us. Thank you for doing this! How soon will the NC chart be available?

There are currently no plans for publishing an updated document. However, information is available during presentations, webinars and via our Insight product and reports.

How do you get buy in from employees? You can create a plan have your activities, measure, and have timelines but to change the culture is hard.

Developing a good site culture is challenging, but there are many tools and ideas that can be used to generate progress. A good starting place is senior manager commitment to the subject. Are the managers seen to be interested in this area? Are KPIs/company communications inclusive of product safety and quality or only about costs and finance? Once the staff understand that this topic is important to managers then other change mechanisms can be used. BRCGS have published a guide to Product Safety Culture (available on our website) and several webinars.

In the UK as a BRCGS Specialist I have almost taken all your standards but am unable to take the Retail standard in the UK. Is this standard available virtually?

Virtual training courses make availability far easier to deliver. Please contact the BRCGS sales team to discuss availability of the Retail Standards course.

We have done a risk assessment as to why we do not have an EMP program. We are a dry facility, low risk. Thoughts?

Simply being a dry facility would not be an acceptable reason for exemption. An auditor would expect to review, and challenge a full risk assessment, including historical evidence from similar industries. A good idea would be to look into a detailed environmental monitoring system design training course, either through your commodity association, or the BRCGS course on the subject.

There isn't a specific cut-off date to request for the 6-month extension? Example: if audit is due in November, I can request for the extension now? or can I request for it in September?

Extensions are in place to temporarily extend a certificate, due to the inability to audit the site. It would not be appropriate to extend a certificate where the audit is not due for 5 months, as there is no evidence as to the ability to perform the audit. The recommendation is that the risk assessment be performed 3 to 6 weeks prior to audit window.

We see current changes with this pandemic, going forward how can IT advance assist in the onsite audits?

BRCGS is currently working on the ability to utilize remote technology and practices to supplement the audit and certification industry. Results and plans will be published in an upcoming BRCGS newsletter.

How are on site audits going to change?

BRCGS is continually working to adapt to the industry needs and provide the best possible value for their investment in product safety. We have introduced several immediate measures to react to the current coronavirus impact, have a number of new initiatives close to completion, and are actively looking into the potential for true paradigm shifts in the area of cutting edge brand protection services, including the use of current and near future technology. The most effective way to stay informed of our developments, is to stay informed via our newsletter.

Will vegetarian food be preferred option, rather than frozen meat products after this COVID issues are overcome or mitigated?

While there have been some disruptions to meat production, we have not seen evidence that there will be a widespread change in consumer demand for meat in exchange for vegetarian options. With that said, we are seeing some increased demand for plant-based protein. This was starting to occur before the pandemic and will likely continue. But we do not see it has displacing a major percentage of meat consumption at this point in time.

In your presentation, what was the percentage of the supply chain disruption as your video image blocked the number?

Here is a link to our survey that includes all the data, including the supply chain disruption number, which is 51%.

What platform is the best to deliver quality training as BRCGS is required the ATP to do. BRCGS is thinking about building a platform for Virtual Training?

We would not recommend a specific platform as there are a variety of platforms available that all do an excellent job however for someone to be approved to be a BRCGS Approved Virtual Trainer their selected platform must be able to support a number of features such as use of emoticons, breakout rooms and chat amongst others. This is because our newly designed converted content requires all these interactions. We are not currently thinking of building our own platform as we have over 300 training partners all over the world and gradually, they will use what works best for them, their companies, and their clients.

As the baby boomers retire the new generations are not interested in the traditional work models, especially when it comes to plant environments, who then will do the work?

This is a great question. There is an assumption that because Generation Z are demanding change in traditional work models, that they are 'lazy' and do not want to do the work in the same way that previous generations did. We think that is a misperception. Gen Z do want to work but they want to do it in a way where they can work smarter and not harder. With that in mind, the way in which we teach individuals how to 'do' the work will need to change massively. We will need to leverage technology to allow individuals to learn new skills rapidly and deploy them quickly to add business value. Gen Z might not necessarily stick around for as long as pervious generations but they will want to add a great deal of value whilst they are with you and it will be down to employers as well as the employee to enable this.

How can we create an environment where the team is fully engaged and committed when the new workforce is accustomed to a gig like economy? how do we train the new gen experts?

Another great question and one that comes down culture. As mentioned in the slides – modern employees are demanding more from employers and will no longer choose to work for the most well-known names, but rather for those companies which recognise and develop their employees. For employers this will mean providing opportunities for individuals to learn new skills rapidly that allow them to add value very quickly to an organisation. The next generation of employees will have a wide range of learning styles but will typically be focussed on speed and relevance. When trying to look at your future L&D strategy for your team employers should focus on choice and variety of learning modalities. Some individuals will still want to attend your traditional 5-day classroom course, others will want to do all their learning via their mobile phone.