



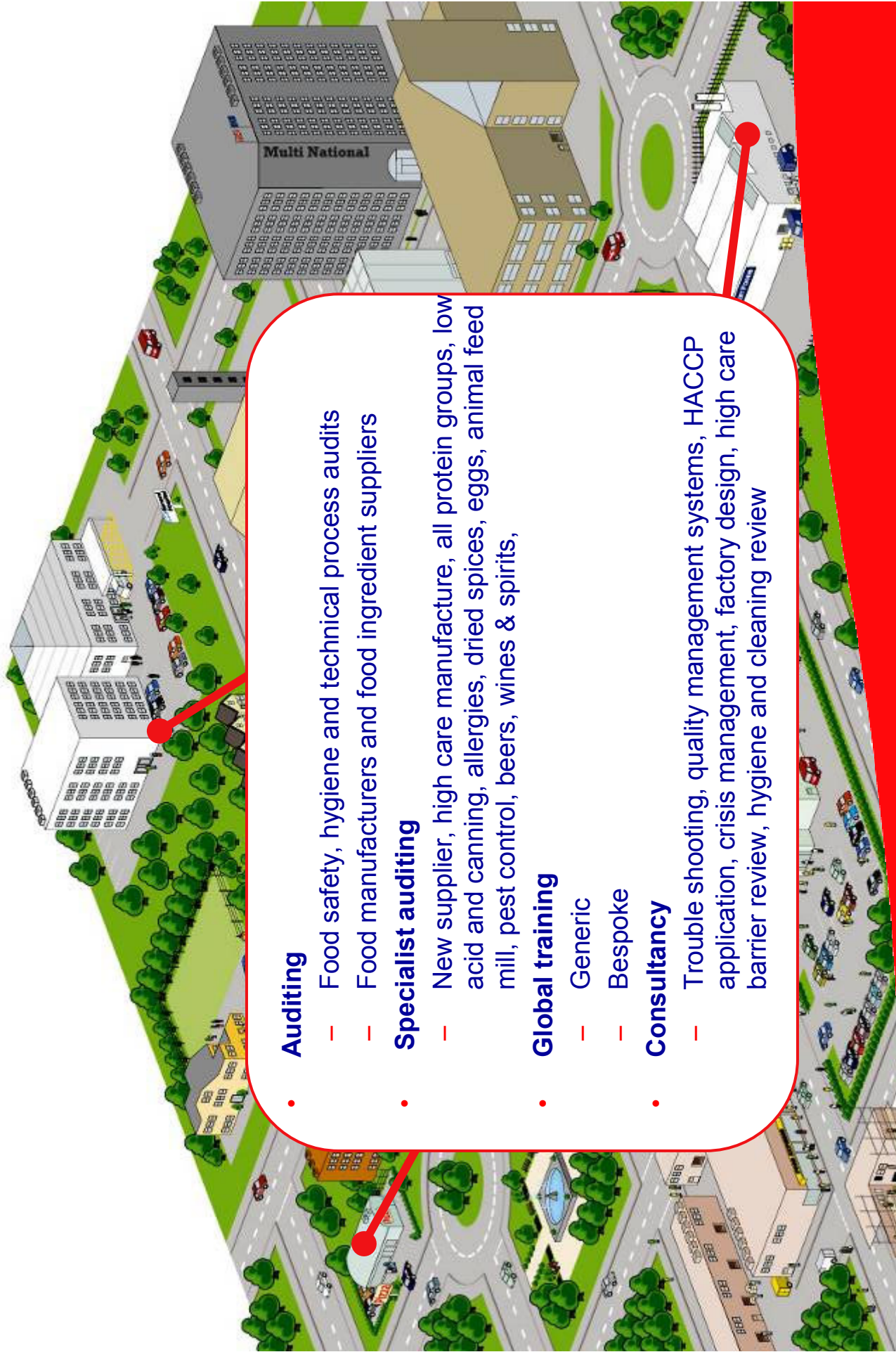
Audits Against Accredited Standards: Ensuring Consistency and Accuracy

HARRIET SIMMONS

NB CERTIFICATION - OVERVIEW



- **PART OF THE CONNAUGHT GROUP OF COMPANIES**
- **ACCREDITED TO THE EUROPEAN STANDARD EN45011 AND TO 17021 FOR QUALITY MANAGEMENT SYSTEMS**
- **ACCREDITATION COVERS THE SCOPE, FROM FARM TO THE CONSUMER**



Auditing

- Food safety, hygiene and technical process audits
- Food manufacturers and food ingredient suppliers

Specialist auditing

- New supplier, high care manufacture, all protein groups, low acid and canning, allergies, dried spices, eggs, animal feed mill, pest control, beers, wines & spirits,

Global training

- Generic
- Bespoke

Consultancy

- Trouble shooting, quality management systems, HACCP application, crisis management, factory design, high care barrier review, hygiene and cleaning review

NB Certification Range of Services



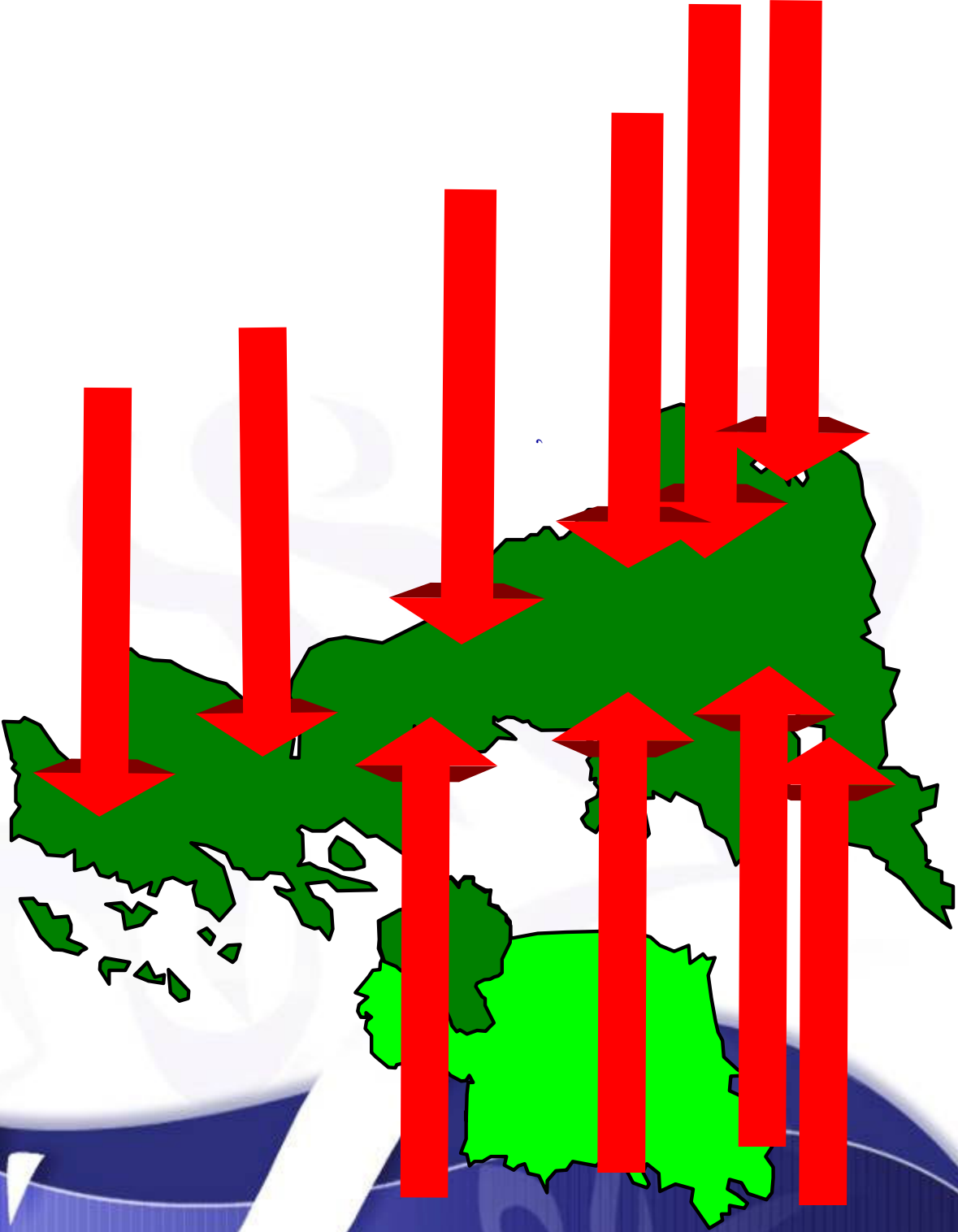
- **ACCREDITED STANDARDS**
- **BRC Consumer Standards for Non-Food Items**
- **BRC Global Food and Packaging Standards**
- **BRC Storage & Distribution Standard**
- **Lion Code Eggs Scheme**
- **BOPP Standard – Ornamental (Cut Flowers) and Pot Plants**
- **LEAF - Environmental Standard for Crops**
- **Global Gap Standards - Horticulture and Ornamental Standards for Farm Operations**
- **Assured Produce Farm Schemes**
- **ISO 22000 Quality Management Systems.**

NB Certification Range of Services



- **Approved Training Enterprise for BRC Training Courses.**
- **Formulating Standards in liaison with Food Industry Experts**
- **Generic Training Programs against Bespoke Standards.**

AUDITING TEAM UNITED KINGDOM



AUDITING TEAM GLOBAL TEAMS

- Europe – Italy, Romania, Germany
- Israel
- Turkey
- Thailand
- Hong – Kong
- Mainland China
- USA
- South Africa

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DEVELOPMENT OF FOOD QUALITY MANAGEMENT SYSTEMS

- **Late 60's:** Pillsbury Corporation developed HACCP with NASA to ensure food safety for 1st manned space missions.
- **1971:** The British Standards Institute (BSI) published first UK standard for quality assurance (BS 9000).
- **1979:** BS5750 published to provide a common contractual document, for control of industrial production.
- **1985:** European Directive introduced burden of proof on manufacturers for defences of defective product.
- **1987:** The ISO9000 certification standard has evolved over a number of revisions.
- **1990:** The UK Food Safety Act 1990 states that it is an offence to sell unsafe food.

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DEVELOPMENT OF FOOD QUALITY MANAGEMENT SYSTEMS

- **1993: Harmonisation of HACCP at an international level through Codex Alimentarius & Introduction of HACCP under a European Directive.**
- **1997: First certifiable standards (NL, DK, AUS) on the basis of HACCP**
- **1997: Setting up of Horticultural Standard, EurepGAP (Now GlobalGAP)**
- **1998: First private sector standard of the consortium of retailers: BRC**
- **2000: The latest version of the standard (ISO 9001:2000),**
- **2001: Foundation of Global Food Safety Initiative (GFSI)**
- **2001: Start of the work on developing ISO 22000 – based on HACCP**

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**DEVELOPMENT OF FOOD QUALITY MANAGEMENT
SYSTEMS**

- **2002:** Increasing demands by retailers for certification
- **2003:** Recognition of first Food Safety Management Standard by GFSI
- **2005:** Publication of ISO 22000
- **2008:** Publication of PAS 220
- **2009:** Publication of FSSC 22000

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Delivery of Standards:

- **National & international standards – increasingly being delivered by independent inspection and certification bodies.**
- **These bodies are typically accredited to standards such as:**
- **EN45004 - The European Standard (identical to ISO/IEC 17020)- sets out operating criteria for organisations undertaking independent inspections.**
- **EN45011 – The European Standard (identical to ISO/IEC Guide 65) - sets out operating criteria for organisations involved in product certification assessments.**

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Implementation and Verification of Standards:

- **Retailers, manufacturers and stakeholders - increasingly recognising the need to monitor not only how bespoke standards are implemented but also how standards implemented are verified by certification & inspection bodies.**
- **Failing to effectively verify standards implemented by a company could impact on product integrity and due diligence.**
- **There is a at times a perceived lack of consistency among certification and inspection bodies verifying standards.**
- **There is also the perception – some CB’s and their auditors “water down” standards due to lack of proper understanding, integrity or expertise.**

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Monitoring of Bodies:

- **Increasingly, such bodies - expected to adhere to additional requirements defined by standard owners, in addition to the requirements for accreditation or inspection.**
- **For BRC, IFS and the horticultural standard Global GAP, the “entry” requirement is for their standards to be implemented via certification bodies accredited to EN45011.**

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Monitoring of Bodies:

- **For ISO 22000 and FSSC 22000, Bodies are required to be accredited against the ISO standard 17021**
- **Accreditation – Typically attained via National Accreditation Bodies**
- **Accreditation – Typically attained via National Accreditation Bodies, such as UKAS in the United Kingdom.**

Some European Accreditation Bodies



United Kingdom



Norway



Germany



France



Spain



Portugal

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GLOBALGAP

- **GLOBALGAP (formerly EUREPGAP) has established itself as a key reference for Good Agricultural Practices (G.A.P)**
- **Another private sector body that sets voluntary standards for the certification of agricultural products around the globe.**
- **A pre-farm-gate standard, which means that the certificate covers the process of the certified product from farm inputs like feed or seedlings and all the farming activities until the product leaves the farm.**

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GLOBALPGAP

Technical Skills and Qualifications:

- **Recognised Lead Assessor training course.**
- **Food Hygiene training & Training in HACCP principles by successful completion of a formal course based on Codex Alimentarius principles.**
- **Pesticide and fertiliser training.**
- **A minimum of 2 years post-graduate and 3 years overall experience in the horticulture industry.**

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GLOBALGAP

Additional Requirements for auditing against horticultural standards:

- **To take an annual on-line exam covering the General Regulations.**
- **Two attempts permitted, pass mark 80%.**
- **Failure at both attempts results in being taken off audit duties**

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GLOBALGAP

Technical Committee:

- **The GlobalGAP Secretariat has also established a Technical Committee made up of experts from certification and the wider industry**
- **The objective – ensure that standards are being properly implemented and that appeals and concerns are adequately reviewed by peer groups.**

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International Food Standard (IFS)

Developed by German and French food trade associations, with the assistance of other international retailers,

The aim of the standard is to focus the various requirements of retailers on one standard. Certification to IFS by independent third-party certification bodies.

IFS is marketed as suitable if a manufacturer or packer is a supplier of German and French retailer branded food products.

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IFS

IFS - Divided into five sections :

- **Senior Management responsibility**
- **Quality management system**
- **Resource management**
- **Production process**
- **Measurements, analysis and improvements**

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IFS

Technical Skills and Qualifications:

- **Confirmation/evidence of knowledge of HACCP and Quality Management Systems.**
- **Auditor scope competence - at least 2 years' food industrial experience or at least at least 10 audits within each product category that the auditor intends to carry out audits.**
- **In-house training by CB's of their auditors based on the IFS in-house Training program.**

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IFS

Additional Requirements for auditing against IFS Standards:

- **Participation at the written and oral examination for the IFS.**
- **Should an auditor fail at the first attempt at the written exam he/she has another opportunity to re-sit the exam.**
- **If the auditor fails the exam yet again he/she is excluded from auditing against IFS standards for 2 years.**

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IFS

Additional Requirements for auditing against IFS Standards:

- **If the auditor successfully completes the written and oral exam he receives a certificate stating in which product scopes he is deemed competent to undertake IFS audits.**
- **This certificate is valid for 2 years.**
- **After this period a re-examination is necessary to keep the auditor admission to perform IFS audits.**
- **Depending on the achieved an auditor can get an admission up to 4 years.**

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IFS

Technical Committee

- **Technical Committee which reviews and addresses issues raised in connection with:**
 - **Audits undertaken against the standard**
 - **Conduct of of CB's and auditors**
 - **Issues related to training program in place.**

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BRC

Global Standards for Food Safety

In 1998 the British Retail Consortium (BRC), developed the BRC Food Technical Standard to be used to evaluate manufacturers of retailers own brand food products.

Designed to assist retailers and brand owners produce food products with their 'due diligence' defence, should they be subject to a prosecution by the enforcement authorities.

Under EU and UK Food Law, retailers and brand owners have a legal responsibility for their brands.

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BRC

- **This Standard quickly became invaluable**
- **. Regarded as the benchmark for best practice in the food industry.**
- **Its use outside the UK has seen it evolve into a Global Standard used as a framework upon which many companies have based their supplier assessment programs and manufacture of branded products.**
- **Many UK, North American and European retailers, and brand owners will only consider business with suppliers who have gained certification to the appropriate BRC Global Standard.**

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BRC

- **The BRC published the first issue of the Packaging Standard in 2002, the Consumer Products Standard in August 2003, and the BRC Global Standard - Storage and Distribution in August 2006 .**
- **In 2009, the BRC partnered with the Retail Industry Leaders Association (RILA) to develop the Global Standard for Consumer Products North America edition.**
- **Each of these Standards is regularly reviewed revised and updated at least every 3 years**

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BRC

Working Groups - set up / facilitated to ensure consistency in implementing standards:

- **Governance and Strategy Committee**
- **Technical Advisory Groups to promote stakeholder co-operation**
- **Co-operation with Certification Body Groups, regular meetings to review issues relating to BRC standards.**
- **CB Groups liaising with BRC include FTCCG – UK, also CB co-operation groups now formed in Australia and Germany.**

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BRC

Technical Skills and Qualifications:

- **Degree or higher education qualification and minimum 5 years relevant post-degree experience.**
- **Successful completion - QMS (ISO 9000) Lead Assessor Course.**
- **HACCP training and ability to demonstrate competence and understanding in application of HACCP principles – recognised industry HACCP qualification**
- **Evidence of training and experience in product fields in which auditor intends to audit.**

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BRC

**Additional Requirements for auditing
against BRC Standards:**

- **Auditors required to undertake a 4 day 3rd Party Auditing Course with an exam that must be passed, pass mark being 75%**
- **Auditors – approved to audit against the standard after successful completion of the course**
- **All approved auditors required to undertake ongoing refresher courses when standards are reviewed**

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BRC Guidelines published to clarify requirements in the following areas:

- **Metal detection**
- **Product recall testing**
- **Process validation- low acid canning**
- **Process validation-pasteurisation**
- **Pest control**
- **Internal audit**
- **Traceability – frequency of testing**
- **Quantity measurement**
- **Complaint handling**
- **Shelf-life determination**

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BRC

Position Statements/Approved Training Training Provider Scheme:

- **Issue of various position statements on website to clarify perceived grey areas within BRC standards.**
- **The Position Statements provide the definitive guidelines to be adopted in auditing the affected clauses.**
- **Establishment of the Approved Training Provider (ATP) Scheme**
- **The training courses and materials – compiled by the BRC Training Dept and issued to ATP centres.**

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BRC

ATP Scheme

- **ATP scheme – set up as BRC training centres world-wide.**
- **Participants of ATP scheme – technical experts, organisations and bodies, whose trainers are individually vetted and approved by the BRC.**
- **All CB's – now to ensure - auditors attend the bespoke BRC training programs for the various BRC standards or set up ATP training centres for in-house training.**

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OVERALL SUMMARY

- **National and International Standards have evolved over a period of decades.**
- **These aim to provide interested parties, assurance that manufacturers and processing parameters consistently meet legal, food safety and customer requirements.**
- **A credible Standard in itself will not deliver these ideals.**

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OVERALL CONCLUSIONS

- **Guidelines and protocols need to be transparent and ensure clarity in the understanding and implementation of such standards.**
- **Organisations that deliver these standards also need to be vetted, not only by National Accreditation Bodies but by the standard owners themselves who are best placed to explain and provide clarity on the standards published**
- **Such vetting is ongoing for some key standards, but needs to be made even more robust and be universally and continuously implemented to retain credibility**

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