



BRC Issue 8: Creating a Food Safety Culture

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Although food safety is and has long been a priority for food producers and manufacturers, new regulatory environments, including new compulsory requirements from the updated BRC, focus on a company's overall approach – its food safety culture.

How can you ensure that you have a strong food safety culture? How do you begin to assess and measure your organizational food safety culture? This guide will get you up-to-speed on the BRC Global Standard updates, help you get started building a food safety culture and evaluate your progress in reaching your goal.

1. Evolving Food Safety

Food safety has long been a priority for food and beverage companies. That said, recent regulatory and auditing environments are leading to a deeper dive into approaches and practices that enhance the quality of foods. Government oversight and inspection is only part of the picture: the focus now is turning toward the manufacturer's cultural footing. This mindset centers around the notion that a strong food safety culture is the foundation that gives strength to successful safety programs and implementations. Although many manufacturers have already set the tone with changes to the BRC Issue 8 Mandates, a food safety culture is no longer voluntary: it's now a compulsory requirement. Yet the concept can be difficult because culture is inherently a reflection of attitudes and behaviors. Moving forward with culture as a compulsory requirement begins with defining and determining that culture, which can be difficult.

2. About the BRC Changes

The [BRC Global Standard](#) provides a framework for food manufacturers to assist them in the production of safe food. In 1998, it was developed in response to the needs of UK members of the British Retail Consortium (BRC) to avoid the confusion and duplication of data which previously existed with various individual retailers' schemes. Today the BRC Standards are used worldwide.

The BRC Standard was the first standard recognized by the Global Food Safety Initiative (GFSI), an organization founded in 2000 to harmonize food safety standards. The GFSI benchmarks existing food standards against guidelines established by retailers, food manufacturers and food safety experts to increase the transparency and efficiency of supply chains, minimize costs by reducing audit duplication and provide assurance of safe food for consumers. The BRC and its subsequent updates are the result in part of such industry-wide collaboration.

Regular updates to the BRC Global Standards continue to reduce the burden of duplicate audits of certified sites. Changes to the standard reflect the latest thinking in food safety. Issue 8 is a response to continued alignment with GFSI benchmarks and potential implications of the US Food Safety Modernization Act (FSMA). One pronounced change in Issue 8 is the encouragement to develop a product safety culture.

3. Getting Started - Building Your Food Safety Culture

Although manufacturers might think their current food safety culture meets the mark, today's auditable and regulatory environment holds them more accountable than ever. It's important to look at what's new and relevant in the BRC Standard because the regulation sets new expectations for management involvement.



Building a food safety culture with the lead from senior management.

3.1 Commitment of Senior Management is Key

According to the new standard in Issue 8, food safety or quality managers can no longer hold the lead when it comes to leading and formulating a food safety culture. Senior management are called to the forefront to engage because, the Standard observes, the product safety culture which prevails at the site is fundamental in the ongoing management of product safety.

A new clause requires the site to introduce and implement a plan for the development and continuing improvement of a product safety culture.

Clause 1.1.2.

The site's senior management shall define and maintain a clear plan for the development and continuing improvement of a food safety and quality culture. This shall include:

- *Defined activities involving all sections of the site that have an impact on product safety*
- *An action plan indicating how the activities will be undertaken and measured, and the intended timescales*
- *Review of the effectiveness of completed*

activities The regulation expands on the concept by requiring senior management to define and maintain a clear plan for the development and continuing improvement of a food safety and quality culture. Clear objectives must be defined to maintain and improve the safety, legality and quality of products. Objectives include:

Clause 1.1.3

- *Targets or clear measures of success*
- *Clear communication to relevant staff*
- *Monitoring and results reported at least quarterly to site senior management*

Another change is reflected in the review process, which is the addition of two new bullet points. The first states that management should learn the reasons why objectives are not being met and use them as the basis for setting future objectives. The second bullet point clarifies that [HACCP](#), food defense and food fraud should be included in the scope of the review meetings.

Clause 1.1.4

Management review meetings attended by the site's senior management shall be undertaken at appropriate planned intervals, annually at a minimum, to review the site performance against the Standard and objectives set in clause 1.1.3. The review process shall include the evaluation of:

- *Previous management review action plans and timeframes*
- *The results of internal, second-party and/or third-party audits*
- *Any objectives that have not been met, to understand the underlying reasons. This information shall be used when setting future objectives and to facilitate continual improvement.*
- *Any customer complaints and the results of any customer feedback*
- *Any incidents (including both recalls and withdrawals), corrective actions, out-of-specification results and non-conforming materials*
- *The effectiveness of the systems for HACCP, food defense and authenticity resource requirements*
- *Records of the meeting shall be documented and used to revise the objectives. The decisions and actions agreed within the review process shall be effectively communicated to appropriate*

staff, and actions implemented within agreed timescales.

Monthly meetings provide a forum for reporting and dealing with food safety concerns. Issue 8 clarifies requirements for reporting and addressing issues relating to product safety that require immediate action.

Clause 1.1.5

- *The site shall have a demonstrable meeting program which enables food safety, legality, integrity and quality issues to be brought to the attention of senior management. These meetings shall occur at least monthly.*
- *Employees shall be aware of the need to report any evidence of unsafe or out-of-specification product or raw materials, to a designated manager to enable the resolution of issues requiring immediate action.*

A new clause establishes the need for a confidential reporting system to enable staff to report concerns.

Clause 1.1.6

- *The company shall have a confidential reporting system to enable staff to report concerns relating to product safety, integrity, quality and legality.*
- *The mechanism (e.g. the relevant telephone number) for reporting concerns must be clearly communicated to staff.*
- *The company's senior management shall have a process for assessing any concerns raised. Records of the assessment and, where appropriate, actions taken, shall be documented.*

3.2 Employee Involvement and Operational Enhancements

With senior management on board, it's important for them and the safety team to take a look behind the scenes. A food manufacturing environment is multi-layered with varying levels of supervision and expertise. All employees, from the operational manager's office to the janitorial staff, have a responsibility for the safe production of food.

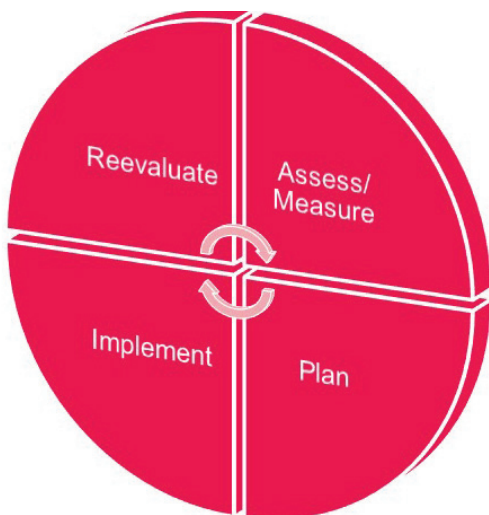
1. Food safety is more than a set of programs: it's a mindset and, as such, becomes the basis of a culture. Besides providing a process for reporting concerns, as the BRC requires in clause 1.1.6, a successful food safety culture holds an expectation that employees are not only

obligated, but are comfortable raising issues relevant to food safety.

2. One of the ways to foster employee engagement is to maintain a visible food safety culture. A strategic food safety and quality plan fosters and supports the objectives. Consistent processes and documentation enhance visibility. Investments by the company in technology that enforce food safety, such as inspection equipment, make a graphic statement that the company is committed to consistent food safety practices. These investments strengthen the company's reputation through a proactive approach. Employees should recognize that senior management is fully committed to promoting food safety, and the overall company attitudes and behaviors that support food safety will be sustained.

4. Assess/Measure, Plan, Implement and Reevaluate

Just as manufacturing processes evolve for greater efficiency, an effective food safety environment is never static. It requires a commitment across senior leadership and the entire organization toward continual assessment and improvement.



Effective food strategy must be assessed, planned, implemented and reevaluated repeatedly to ensure audits meet standards.

4.1 Determine Your Baseline

To begin, assess your current food safety culture to identify your company's strengths and weaknesses. Assessments can include employee surveys about company values and food safety culture, a review of current food safety practices, interventions and

an evaluation of training. Examine food safety activities. How are food and beverages checked for safety? This may consist of laboratory analysis and/or product inspection or it might also include the use of x-ray systems to find and reject contaminants and enhance food quality, consistency and production traceability.

To measure those strengths and weaknesses, consider using a specialized tool. The BRC Standards Food Safety Culture Excellence Module is a unique solution for the measurement, analysis and improvement of organizational culture. Highlighting an organization's strengths and weaknesses with a measurable score and analysis provides a baseline. If repeated annually, this tool compares the success of ongoing investments and changes.

4.2 Plan for Continual Engagement and Progress Checks

A strong culture of food safety is a work in progress. Companies should develop a plan to continue engagement and conduct periodic reviews. Focus on areas such as:

1. **Systems.** Can my processes and procedures be updated, not only for greater efficiency, but also to improve product safety?
2. **Employees.** Am I giving them the best training available so that they can recognize potential food safety issues? Do they feel comfortable bringing concerns to me?
3. **Tools.** Am I using the most up-to-date equipment, such as analytical and inspection equipment, to prevent food safety-related issues?
4. **Structure.** Can I create a schedule for ongoing assessments, information gathering, and risk analysis?

4.3 Verify Your Plan's Progress with Audits

The effectiveness of a company's food safety plan that helps drive food safety culture is verified by internal audits. BRC rephrases the internal audit program to add clarity.

At a minimum, the program should include at least four different audit dates spread throughout the year. Risk determines the frequency with which each activity is audited. All activities must be covered at least once each year.

These activities include:

- HACCP or food safety plan, including the activities to implement it
- Prerequisite programs
- Food defense and food fraud prevention plans procedure
- Procedures implemented to achieve the Standard

4.4 Checks and Balances for Building and Maintaining Your Safety Culture

It's easy to get lost in the weeds, especially when dealing with the interpretation of specific clauses in the BRC and also with a concept as broad and open to definition as culture.

To break through those weeds, there are tips to keep in mind to clearly develop and support a culture around food safety:

1. Don't confuse a food safety program with a food safety culture.
2. A food safety culture is a reflection of attitudes and behaviors by employees who carry out manufacturing processes. Their awareness and attention is the key to reducing food safety issues, be it allergen control, labeling control, foreign body detection, or microbial contamination.
3. A commitment to food safety by senior management not only demonstrates a company value, it serves as a constant example for employees to follow.
4. Use communication between management and employees to establish trust so that employees feel empowered to speak up if they have safety concerns.
5. Strive for behavior-based approaches rather than system-based steps. While processes can and should be put in place to enhance food safety, i.e. the quality checks, a food safety culture is a way of life.

5. Conclusion

The only certainty in life – and in food manufacturing – is change. BRC Issue 8 raises the bar for food safety and places it clearly in the hands of senior management charged with enhancing and ensuring their organization's food safety culture. Manufacturers are encouraged to assess their current culture, make improvements and then review the effectiveness of those improvements. The expectations align more closely with FSMA, so if followed and adhered to, excellence in meeting the Standard provides a solid foundation for meeting FDA's requirements.

The shift toward mindset and behavior as opposed to process or policy is significant and essential to today's successful food safety programs. Food safety training and implementation are vital components, but something is missing if one is just going through the motions or doing things as they have been done before. Development of a food safety culture provides a framework for all employees to share responsibility. Ultimately, it's up to the leaders of the organization to keep product safety at the forefront by example, through communication, and by attention to detail.

6. Additional Resources

British Retail Consortium (BRC)
www.brcglobalstandards.com

- Global Standard Food Safety Issue 8 – Guide to Key Changes
- Global Standard Food Safety Issue 8 – Changes and Challenges for the Organizations
- Global Food Safety Issue 8 – Interpretation Guideline
- BRC Culture Excellence – Food Safety Culture Module

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The Knowledge Center

The Eagle website is packed with current industry relevant information. You will also find a [knowledge center](#) with white papers, webinars, videos, essential user documentation, animations, data sheets and case studies that showcase the latest issues, trends and innovations in food inspection technology.

As experts in product inspection technology, we will continue to develop our knowledge center to serve as a reliable source of information for industry professionals, providing a variety of data that will help you understand product inspection technology and applications specific to your industry.

Read More on Building a Food Safety Culture



[Food Safety Culture: What Does It Mean and Do You Have the Right One?](#)



[New BRC Mandates that Impact Food Safety Mindsets and Measures](#)



[Checklist for Creating a Food Safety Culture, from Senior Management and Employee Buy-in to the Deployment of Technologies](#)

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