



BRCGS072: Position statement - Certificate Extension for Audits Impacted by Covid-19

Document Scope: This document covers the mandatory requirements on certification extensions for audits affected by Covid-19.

Change log:

Version no.	Date	Description
1	12/3/2020	First publication
2	18/3/2020	Document not published although main message changes were: Updated permissions on remote audits, certificate extension period changed from 12 to 6 months and postponement of unannounced onsite audits.
3	25/3/2020	Update to be in line with GFSI position 6 month certificate extension based on completion of risk assessment verified through site discussion
4	14/5/2020	Update on BRCGS fee. Update on optional uptake of unannounced audits. Clarification of certificate audit due dates. Removal of '12 months certificate issued on reaudit'
5	16/6/2020	Update on fee rates
6	09/09/2020	New title. Updated to reflect publication of BRCGS080 (Blended Audits) and BRCGS086 (Remote Audits). Rules relating to unannounced audits moved to BRCGS078. Illustrated scenarios removed as duplicate separately published FAQs.
7	16/12/2021	Updated document to meet brand guidelines and include rules on certificate extensions following a remote audit, in order to be in line with GFSI requirements.
8	04/05/2022	This version comes into effect 1 July 2022. Updated to emphasize that Certificate Extensions are only to be applied when a site is genuinely unable to receive an audit (due to regulatory requirements/restrictions, a covid outbreak at the site, or auditor illness/covid-19 infection) Stipulated that Certificate Extensions must be approved by BRCGS through the concession process.



9	27/09/2022	<p>This version comes into effect 1 January 2023</p> <p>1. Requirements – removed 'covid-19 outbreak at the site' and 'the scheduled auditor contracting covid' as acceptable reasons for requesting a certificate extension</p> <p>2. Re-audits due - updated to emphasize that certificates may be extended for a maximum of 6 months.</p> <p>9. Certification - updated to emphasize that certificates may be extended for a maximum of 6 months, and updated to reflect the policy that certificate extensions are only allowable where a site is located in a country or region where government advice/restrictions prevent movement or access to the site</p> <p>11. Audit Due – added clarification on unannounced audits</p>
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Introduction

BRCGS acknowledge that Covid-19 continues to impact the planning and undertaking of audits, often with changes required at short notice. Government controls continue to be in place in some regions, and resource impacts both Certification bodies and sites. BRCGS have issued this updated position statement, to take into account the current global situation relating to coronavirus and the guidelines from GFSI.

Note that BRCGS073 Guidance of expectations on how to complete the remote audit is rescinded and is no longer in use.

1. Requirements

BRCGS will expect sites and certification bodies to follow any government guidance in place for the region or country applicable.

Whilst we recognise that in some instances a physical audit is not possible, we've had feedback from users of the scheme that they would like to see a return to the 'usual' protocols. This procedure applies to existing certificated sites who are genuinely unable to receive a physical audit because the site is located in a country or region where government advice/restrictions prevent movement or access to the site

We appreciate that the travel restrictions may have an impact on audit arrangements where auditors located in a restricted travel area cannot audit other regions. We also understand that high risk staff members may have to be safe guarded. BRCGS, do however expect that certification bodies utilise their global auditor pool. Reasons for audit delay due to cost purposes will not be accepted. This process must be used as a last resort and extensions must be approved by BRCGS through a concession. Concession requests for Certificate Extensions must include justification for the extension and a date when an onsite or blended audit will take place. This process is not applicable to sites not currently certificated to BRCGS.

2. Re-audits due

Where the site is operational, but a physical audit may not occur on or before the audit due date and will result in existing certificates expiring, a certificate extension of up to a **maximum** of 6 months validity may be issued based on:

- The successful completion of a risk assessment by the Certification Body confirming it is appropriate to continue certification.
- The Certification Body completing a discussion with the site, and review of procedures that have been implemented. The purpose of the discussion and review is to assess the impact of Covid-19 extraordinary circumstances to the site operations, and confirm the effective implementation of any emergency response plan.
- The previous audit undertaken at the site was a physical audit (i.e. Fully onsite or blended). A site cannot request for a certificate extension if the previous audit was a remote audit.
- A request for a concession must be approved by BRCGS and must include justification for the extension and a date when an onsite or blended audit will take place

Note that certificates may only be extended by the current Certifying Body.

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3. Risk Assessment

The Certification Body shall assess the risks of continuing certification and have a documented policy and process defining the methods for evaluating the site. Reference may be made to the principles of IAF document ID3:2011 *Management of Extraordinary Events or Circumstances Affecting ABs, CABs and Certified Organizations*.

The Certification Body shall gather information from the certified site and consider within the risk assessment:

- The history of third-party certification
- The history and maturity of the BRCGS system
- Whether there is any other management system or certification in place
- Absence of critical situations throughout the organization's certification history with respect to the BRCGS standard
- Pending compliance activities / legal proceedings
- Product recalls since the last BRCGS audit
- Whether the site is functioning normally
- Whether significant changes have been made at the site since the last BRCGS audit
- Whether the site is operating to the scope of certification
- Any changes to processes or services outsourced following the Covid-19 emergency
- The appropriateness of the site's emergency response plan to Covid-19.

4.0 Discussion with site

The aim of the discussion is to assess the site actions in response to Covid-19 and ensure that the site has developed its procedures such that it can continue its operations to supply safe products.

The Certification Body shall agree appropriate times with the site to complete a review of the risk assessment details to confirm that it is appropriate to extend certification.

This does not need to be completed in one session and the duration can be appropriate to the complexity of the issues to be discussed but should be a minimum of 1– 2 hours where there are few site changes. This shall be conducted with suitably senior and competent persons at the site. It is expected that supporting documents are provided as evidence for discussion. The total time for the risk assessment and generation of the report by the Certification Body is typically 4-8 hours.

This shall include as appropriate:

1. Review of implementation of sites emergency response plan to Covid-19.

- Sites should have considered impact of staff availability with contingency plans in place. They shall have updated their screening processes for staff and have a policy in place for staff members who may have been exposed to Covid-19.
- The site shall have considered requirements for additional or increased cleaning and where appropriate hand washing.
- The site shall have defined minimum criteria for cleaning and product quality management where the optimum activities have needed to be adjusted due to staff shortages.
- Sites shall have contingency plans in place for ingredient supply that may be affected.

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- The site has a clear policy on access to the site and the impact on any service provision changes (e.g. maintenance and pest control, to ensure continued production of safe products).
- The Certification Body would be expected to sample evidence of an appropriate management meeting discussion/actions as well as the documented policies.

2. Internal Audits

- Review of internal audits schedules and implementation to ensure that product safety systems continue to operate effectively under pressure.
- The Certification Body would be expected to sample an appropriate recent internal audit as well as the documented policies

3. Review of recent customer complaint levels

4. Review of any product recall since the last BRCGS audit, root cause and corrective actions put in place as a consequence.

5. Outcome

Any concerns following the discussion with the site that could raise doubts to continuing certification shall be documented in a similar format to 'non conformities' and the Certification Body shall agree with the site a process where these can be actioned, where appropriate, so that certification can be extended.

Certificates may only be extended to the current scope – significant changes to scope may not be made.

6. Sites Certificated with C and D Grades

Where sites are currently certificated with a grade C or D, unfortunately these shall be classified as 'high risk' and certificates may not be extended. The site should discuss with their certification body whether onsite, blended, or remote audit options are applicable.

7. Sites Certificated to Global Standard Gluten Free

Where certification to Global Standard Gluten Free is currently in place at a site based on a third-party certification, other than BRCGS, the risk assessment principle may be used for sites that fall into the criteria, as long as the third-party certification is maintained (i.e. other scheme certificate is permitted to be extended).

8. Informing BRCGS

'Concession reference numbers' are required for certificate extensions

In addition, updates have been made to the BRCGS Directory audit schedule tab where certificate extensions shall be indicated as directed by BRCGS076.

9. Certification

If the certification body is satisfied that continued certification of the site is appropriate, a certificate extension of up to a **maximum** of 6 months may be issued.

- The grading will stay the same as the current certificate.

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- The re-audit due date will be ‘from’ the current last audit due date until ‘to’ a **maximum** of an additional 6 months. The audit window will therefore be up to 6 months long.
- The certificate expiry date will therefore be recalculated as up to a **maximum** of an additional 6 months.
- Whilst the certificate is issued with up to a **maximum** of 6 month expiry, the re-audit date shall be agreed with BRCGS during the concession. The re-audit shall be planned and undertaken at the earliest opportunity following the lifting of the Covid-19 restrictions.

10. Reporting

The risk assessment of the site and conclusions made by the Certification Body shall be uploaded to the BRCGS Directory.

BRCGS Fee Rates for relevant Standard or additional modules

Sites will continue to be able to access the usual BRCGS support service packages where their certificate has been extended. A certification fee will be charged by the certification body as per the BRCGS schedule of Delivery Partner Certification fees.

11. Audit Due

Once the site becomes accessible, the full audit (fully onsite or blended option) will need to take place as normal. This should be planned for the earliest possible dates following the lifting of the Covid-19 restrictions and agreed with BRCGS during the concession process. It is not necessary to wait for the 28-day audit window prior to the extended audit due date.

For unannounced audits – the audit may occur on any date from the site agreement that an audit can occur, until the 28-day window prior to the audit due date. The exact date is not communicated to the site. Where it is not possible to accommodate an audit until the 28-day audit window, then the audit shall be announced

Where a site remains inaccessible and an onsite audit is still not possible after the certificate extension, a remote audit may be permitted (in accordance with BRCGS086). A concession must be agreed with BRCGS.

Where a new certificate is achieved, the certificate expiry will be 6 or 12 months from the audit date, in accordance with the normal protocol in the Standard.

12. Compliance

Accreditation Bodies will be responsible to assess the implementation of this guidance as well as BRCGS. Either party may require to be included as observer during any site discussion.

These guidance notes are under continual review as per the developing situation and may be subject to change.

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