
Building digital, traceable, food safety systems for the future

What are the key advantages of blended audits, and what is the uptake (as there is still an element of physical / on site auditing), there are still access challenges in COVID times? The most significant advantage of blended audits is flexibility. Dates can be scheduled in agreement between certification body and the site. Because 2 audit dates are required there is a longer audit window during which the audit can occur. And the whole audit does not have to occur within a single week, for those sites that found a whole, multi-day audit within a single week too onerous.

Covid-19 creates many challenges for all aspects of the industry and will unfortunately continue to do so for some time yet.

[John Figgins, Senior Technical Manager Food, BRCGS](#)

Is there a compromise on the robustness of a fully remote audit v physical presence?

A fully remote audit is only permitted where Covid-19 restrictions genuinely prevent onsite audits, this is due to the additional challenges presented by this type of auditing. However, where an onsite audit is not possible due to the restrictions, the remote audit option provides a good level of assurance for sites and their customers.

[John Figgins, Senior Technical Manager Food, BRCGS](#)

Should the selection of a fully remote audit be means tested to ensure that sites do not default to this as an easy option?

The certification body is responsible for ensuring that the site selects the correct audit option. A fully remote audit can only be selected where Covid-19 restrictions genuinely prevent onsite audits.

[John Figgins, Senior Technical Manager Food, BRCGS](#)

Can a site have more than one 6-month extension (consecutive or not consecutive) due to Covid restrictions at the site?

No. GFSI benchmark rules are clear - a site may only have one certificate extension.

[John Figgins, Senior Technical Manager Food, BRCGS](#)

How has the pandemic impacted your compliance program, are you confident that completing compliance assessments remotely are effective with "challenging" sites?

BRCGS maintains a comprehensive compliance programme with a number of workstreams, and whilst the pandemic limits the number of physical site visits, we still maintain an active programme of site, certification body and auditor assessments, including the use of remote technology.

[John Figgins, Senior Technical Manager Food, BRCGS](#)

If a facility needs to apply for a new BRCGS certificate. How can this be made in a country that still have some restrictions?

The first step should always be to discuss this with the site's chosen certification body. They are both knowledgeable of the limitations on auditors visiting a site within the specific country and the audit options BRCGS has put in place.

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John Figgins, Senior Technical Manager Food, BRCGS

Are easy gains in modern microbiological methods (e.g. PCR) being ignored through perceived difficulties, at the detriment of "easy wins" for improving ethics, sustainability, and food/environmental safety.

During the COVID pandemic, access to any laboratory has been limited. Many have been preoccupied with COVID testing. This has definitely reduced the amount of sampling or use of microbiological techniques adopted. However this is, hopefully, only a short to midterm glitch. However ethics, sustainability and the pre-requisites of food safety cannot be measured by any microbiological testing regardless of how advanced it becomes. Therefore, I believe that these are distinctly separated and do not think that modern microbiological techniques are being ignored and/or substituted with 'easy wins'.

Sarah Delaney, UK & IE Food Safety Manager, IKEA Group

Can you please elaborate on if you see food safety and ethical being combined and how would you do this?

The key point here is about having robust management systems in place. Poor culture will likely mean neither ethical behaviour is found, or food safety standards are particularly high as there is less focus on these elements. Then as some specific examples of how there are links: if a factory is dirty or unsafe then the worker is not safe/is likely to have an accident, but food is also more likely to get dirty in or other contaminants. Long working hours means people get tired and then are more prone to mistakes, which will also impact on food quality and potentially food safety. There are however differences in terms of some of the skills needed to audit these points and a focus on the softer skills such as interviewing techniques are required more when looking at ethics and worker welfare.

Sam Ludlow Taylor, Partner & Ethical Trade Manager, John Lewis Partnership

How about plastics and recycling, do you think companies should be doing more than just reporting progress via self-declaration vs continual improvement?

I actually believe we can all do more with plastics and recycling. However, as we said in the conference, the three 'r's start with reduce. If customers stop purchasing goods that are not packaged sustainably then suppliers have to make changes. If suppliers stop providing non-sustainable packaging then customers cannot buy it. Unfortunately this is a vicious circle that needs everybody to buy in to making a difference

Sarah Delaney, UK & IE Food Safety Manager, IKEA Group

And is it possible to engage adults/workers in the business? Small steps, like switching off computers ... would that be a first step? Is it possible to change adults mentality and habits of life.

I think it is always possible to change people's attitudes if you are willing to put the time in, there is a lot of research out there about change management processes and the application of these would help in this instance.

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Sam Ludlow Taylor, Partner & Ethical Trade Manager, John Lewis Partnership

Are there any conferences, courses, or sources of information, recommended for increasing understanding/knowledge on sustainability, and ethical auditing (things to look for/improve)?

For ethical auditing, I would recommend undertaking the SA 8000 Lead auditor training course as it teaches you about triangulation of data. Also a course on investigative interviewing skills would help with the softer side of worker interviews - it is imperative that workers trust you if they are going to open up to you. I have found Innovation Forum conferences good in the past and also you could look at Sedex training and ETI guidance documents.

Sam Ludlow Taylor, Partner & Ethical Trade Manager, John Lewis Partnership

How can we work with suppliers in developing countries towards achieving sedex certification? issues like minimum age are not high in their priorities but also it might mean eating vs going hungry.

It is worth noting that there is no such thing as Sedex certification and for a very good reason, Sedex is a database which holds information and assessment data. It is not a pass or fail process, which allows for continual improvement. I would also argue that minimum age is a high priority anywhere, no one wants their child to have to work - this is about poverty and a lack of equality. The first step would be to understand what the challenges are that are being faced and then start to look to address them from the root cause. Also, a layered approach works best, allowing continual improvement. So, set non negotiables, then points that can be worked towards within a timeframe, and then those which can take longer to get to. There is no short-term fix in this scenario so a commitment from both sides to work together is key.

Sam Ludlow Taylor, Partner & Ethical Trade Manager, John Lewis Partnership

What is the view on Re-useable packaging, not recyclable packaging? Setting up a system to collect, wash and re-fill containers.

I think it is great and there were some really good trials kicking off just before the pandemic hit supporting (particularly offices) doing this.

Sam Ludlow Taylor, Partner & Ethical Trade Manager, John Lewis Partnership

Do you think ongoing monitoring of filters can support overall hygiene? Bakeries for example
Yes! We witness quite regularly at companies who have poor air quality in their production area a premature spoiling of product, which essentially results in shorter shelf life. We have worked with a number of companies to improve air quality and product shelf life. These two improvements are symbiotic with each other and can easily be achieved if the correct hygiene practice that encompass Hvac Maintenance & Air Quality Monitoring are in place. approval and spot buy purchases

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[Ross Dumigan, Camfil UK Ltd.](#)

There is certain retailers that specify a certain airflow speed (in addition to positive air pressure) coming out from high care - is this something that BRC specify as well or what would be your thoughts on this?

Firstly, what standards are the retailers using to specify? Airflow should not be the specification, rather it should be room pressures based on having a specific number of air changes within the room. Generally speaking for High Care areas the minimum requirement would be ensuring at least 5 air changes an hour with minimum final filtration levels of H13 in accordance to EN1822:2019.

[Ross Dumigan, Camfil UK Ltd.](#)

Do you have any examples of where food has been contaminated due to poor air quality?

Multiple, we have seen this happening at Dairies, Infant Nutrition Plants, Yogurt production, Cheese Production, Bakeries, Biscuit production facilities. These can range from large scale product recalls to the effect on product integrity. Unfortunately I can't share exact examples but if you have any questions please contact me to discuss.

[Ross Dumigan, Camfil UK Ltd.](#)

What is Ross' opinion/thoughts on using glass fibre filters within AHUs, thinking of glass fibres being released into the airstream, and getting into food products in productions?

All filters being supplied to site no matter what the manufacturer should be non-shedding regardless of the media. All our range of bag filters are non-shedding and we have also designed products called ProSafe which are specifically designed for Food & Beverage applications and every filter comes with certification for EC1935:2005 / ISO 846 / VDI 6022 / Certified "Free from Harmful Components" / Fully Tracable.

[Ross Dumigan, Camfil UK Ltd.](#)

Just to be clear, are the Cam cleaners more of a temporary rather than permanent solution?

They are a permanent solution. Let's think of a factory that has insufficient air changes, low level dust build up, odour problems or are worried about removing decontamination agents or has expanded or adapted production without consideration of air quality requirements within the process. These systems can be used to combat multiple air quality problems without a full renovation of your HVAC requirements. The systems are designed to remove air quality problems at source and ensure a cleaner, safer and healthier workplace environment. Protecting your people, products and processes.

[Ross Dumigan, Camfil UK Ltd.](#)

How do you determine a frequency for changing filters?

Listen to the standards and guidelines. Filters should ALWAYS be changed based on their pressure differential. There is a standard EN13053 that states that filters should be changed once they reach 2 times its initial pressure drop or when it increases by 100pa. This will

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ensure that the filter achieves optimal performance in your HVAC system. The only mention of time in these standards is that the filter should be changed after 2 years if it hasn't hit these thresholds.

[Ross Dumigan, Camfil UK Ltd.](#)

What microorganisms shall be monitored? Some examples, please. What tolerances should be used?

Salmonella, Listeria & eColi are the most commonly monitored by our customers at their facilities as they post the greatest risk to the product integrity. In terms of thresholds these should be as low as possible to reduce any risk.

[Ross Dumigan, Camfil UK Ltd.](#)

How was engagement with auditees for the remote internal audits?

Engagement was good. The important aspects is to prepare the workforce for this type of auditees and to make them understand that it is still a tool for improvement and therefore they need to spare the time to be there.

[Barbara Serra, SH Pratt](#)

What do the panellist think about the following scenario - I was performing a remote audit and saw an operator do something wrong, but the staff member on the floor (with the camera) said that they had performed the task correctly This was around taking a previously metal detected product for performing the routine challenge testing.

In this particular case the auditor need to act as he was in a physical audit, you have seen the task not be performed according procedures and requirements therefore you highlight it to the auditee explaining what you have seen and issue the non-conformance. if it was a physical audit they might persuade you the same way saying it was a one of, but you as an auditor still need to issue a non-conformance has it did happen during the audit.

[Barbara Serra, SH Pratt](#)

Do you not find it challenging for those required to work on site to give the audit process enough focus? These staff are often taking on a lot of responsibilities with high demand on their time while compensating for the those that are working remotely.

You just need to find a balance and do reasonable requests.

[Barbara Serra, SH Pratt](#)