

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

Clauses 1 Senior management commitment		
Clause	Clause subject	Details of main changes
1.1	Statement of intent	Senior management commitment and continual improvement clause now requires continual improvement of the site's food safety and quality culture.
1.1.1	Food safety and quality policy	Has been expanded to include a commitment to improve the site's food safety and quality culture.
1.2	Food safety culture	The clause now has been expanded to include: <ul style="list-style-type: none"> <li>- food safety and culture plan to include behaviours needed to achieve the intended positive culture change.</li> <li>- where site activities have an impact on product safety the Food safety and culture plan shall be designed around clear and open communication on product safety training feedback from employees, behaviour changes required to improve product safety processes, performance measurement on product safety, authenticity, legality and quality related activities</li> </ul> There is also a requirement to review the Food safety and culture plan at least annually.
1.1.3	Objectives	Objectives are now required to maintain and improve authenticity. BRCGS define authenticity as ensuring that food or raw materials purchased and offered for sale are of the nature, substance and quality expected. There is now a requirement for the progress of objectives to be reported to staff.
1.1.4	Management review	Additional requirements for food safety and culture plan to be reviewed at management review meetings.
1.1.5	Review of food safety, legal, integrity and quality issues on a monthly basis	Integrity has been removed as one of the areas to be reviewed on a monthly basis but authenticity has been added. The requirement for employees to report unsafe and out of specification product has been moved to clause 1.2.3.
1.1.11	Certification audit	There is now a requirement for the site's senior manager to be available during the audit for a discussion on effective implementation of the food safety and quality culture plan.
1.2.2	Employees' responsibilities	Additional requirements covering all employees shall have access to relevant documentation and be able to request an assessment of training needs for activities undertaken to maintain product safety, authenticity, legality and quality.
1.2.3	Reporting unsafe product	Requirements to report unsafe and out of specification product relocated from clause 1.1.5.
1.2.4	External consultant	New clause stating external consultants can be used but day-to-day management of the food safety systems shall remain the responsibility of the company.
Clauses 2 Food Safety Plan – HACCP		

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

Clause	Clause subject	Details of main changes
2.2.1	Prerequisite programmes	Examples of prerequisites now have a reference documented back to relevant clauses in the standard.
2.3.2	Hazard analysis	Potential information to conduct a hazard analysis has been expanded to include: sources a copy of any existing site HACCP plans (e.g. for products already in production at the site) a map of the premises and equipment layout (see clause 4.3.2) a water distribution diagram for the site (see clause 4.5.2) indication of any areas (zones) where high-risk, high-care.
2.6.1	Verify Flow diagram	There is an additional requirement that requires sites to review HACCP flow diagrams whenever there are changes which may affect food safety.
2.7.4	Control measures	The requirements to validating prerequisites that are used to control hazards has been moved to a new clause 2.7.4.
2.9	Critical Limits	Additional text requiring critical limits to be validated has been added.
2.12	Verification	Additional text requiring validation of HACCP Plan has been added.
2.12.1	Validation	New clause requiring the Food safety – HACCP plan to be validated before implementation.
2.14	Review the HACCP plan	Clause 2.14 and relevant sub clauses relating to Review the HACCP Plan have been removed. However there is a requirement in clause 1.1.4 for HACCP plan to be reviewed.
<b>Clauses 3 Food Safety and Quality Management Systems</b>		
	Clause subject	Details of main changes
3.4.1	Audit programme	Additional requirements for site internal audit programme scope to include: food safety and quality culture plan assessment of the site's conformity with their food safety and quality management systems.
3.4.3	Conformity and nonconformity	Additional requirement requiring non conformities raised at internal audits to be handled as detailed in corrective and preventive actions clause 3.7. Non conformities raised at Internal Audits also need to be reviewed at management review meeting.
3.4.4	Hygiene and fabrication inspections	Additional requirements requiring: Issues raised at hygiene and fabrication inspections shall be reported to the personnel responsible for the activity. For issues raised there needs to be corrective actions, and timescales for their implementation, shall be agreed and their completion verified. As a minimum a summary of the results shall be reviewed in the Management review meetings clause 1.1.4.
3.5.1.1	Raw material risk assessment	Additional requirement added that requires risk associated with customer requirements to be considered
3.5.1.2	Supplier approval	The scope of supplier audits has been expanded to include: product security food defence plan the product authenticity plan good manufacturing practices The audit shall ensure that the food defence plan and product

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

		<p>authenticity plan form part of the supplier’s product safety management system and that any resultant actions are implemented.</p> <p>Questionnaire used to evaluate low risk suppliers as a minimum shall have a scope that includes: product safety product security food defence, product authenticity, Traceability, HACCP review good manufacturing practices.</p> <p>The questionnaire is now required to be reviewed and verified by a demonstrably competent person.</p>
3.5.3.1	Approval of suppliers of service	The procedure for the approval of supplier services now needs to include product safety consultants.
3.5.3.3	Monitoring of service suppliers performance	There is now a requirement to have in place a process for ongoing performance review of suppliers of service, based on risk and the performance criteria defined.
3.5	Management of outsourced processing	Additional text has been added clearly defining what is meant by the term outsourced processing.
3.5.4.2	Approval of outsourced processor	<p>The scope of outsourced processor audits has been expanded to include: product security and food defence plan the product authenticity plan good manufacturing practices.</p> <p>The audit shall ensure that the food defence plan and product authenticity plan form part of the outsourced processors product safety management system and that any resultant actions are implemented.</p>
3.5.4.3	Outsourced processing and HACCP.	There is a new requirement that outsourced processing be included in site HACCP plan.
3.5.4.4	Outsourcing specifications	There is now a requirement for sites to have clear and agreed specifications for all outsourced processing.
3.7.1	Corrective action procedure	New requirement that site procedures will include the completion of root cause analysis and handling of preventive action.
3.7.2	Nonconformity investigation	<p>The clause has been expanded to include the situation where authenticity is not met and adverse trends in quality and this shall be investigated and recorded.</p> <p>BRCGS define authenticity as ensuring that food or raw materials purchased and offered for sale are of the nature, substance and quality expected.</p> <p>The following statement has also been added: Root cause analysis shall also be used to prevent recurrence of non-conformities and to implement ongoing improvements when analysis of non-conformities for trends shows there has been a significant increase in a type of non-conformity.</p>
3.7.3	Root cause analysis procedure	Clause has been removed but requirement for root cause analysis procedure detailed in clause 3.7.1
3.8.1	Non conformity procedures	Clause has been expanded to include procedure required for management of any product returned to the site.

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

3.9.1	Traceability procedure	A requirement has been added requiring a traceability system to meet the legal requirements in the country of sale or intended use.
3.11.1	Management of incidents	Clause has been expanded to include the site requiring systems in place to manage incidents and potential emergency situations that impact authenticity.
3.11.4	Food safety incident	The clause has been expanded to include incidents relating to authenticity or legality. New requirement Certification body needs to be informed when a site has a withdrawal in three working days using the BRCGS Directory. Additional requirement added requiring site to provide sufficient information when an incident has occurred to certification body covering corrective action, root cause analysis and a preventive action plan undertaken by the site.
<b>Clauses 4 Site Standards</b>		
Clause	Clause subject	Details of main changes
4.1	External standards	Statement of intent title wording changed to 4.1 External standards and site security.
4.1.4	Visitors and contractors	New clause detailing requirements for the control of visitors and contractors covering: Policies and systems required to control access of employees, visitors and contractors. Plus a system for recording visitors entering the site to be in place. Contractors and visitors, <b>including drivers</b> , shall be made aware of the procedures for accessing the site. Only authorised personnel have access to production and storage areas. Contractors working in product processing or storage areas shall be the responsibility of a nominated person.
4.2	Statement of intent	Statement of intent title wording changed to Food Defence.
4.2.1	Food defence personnel	New requirements for personnel involved in developing threat assessments and food defence plans are required to understand potential food defence risks at the site. Where there is a legal requirement for food defence training the site shall ensure this has been undertaken.
4.2.2	Threat assessment	New requirement: Where applicable, the <b>food defence plan shall meet the legal requirements in the country of sale or intended use.</b>
4.3.1	Production risk zone	Requirement moved from clause 8.1.1 The site shall assess the production risk zones required for the products manufactured, processed or packed at the site, using the definitions in appendix 2 of the Standard.
4.3.2	Site map	New requirement that require <b>additional information to be detailed on site map covering:</b> Production risk zones to be defined where the product is at different levels of risk from pathogen contamination. any areas where time segregation is used to complete different activities (for example, time segregation for high-care areas).

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

4.4.6	Elevated walkways	The term mezzanine floors has been added.
4.4.11	Strip curtain	New requirement that requires: Where plastic strip curtains are present, these shall be maintained in good condition to prevent pest ingress.
4.5.1	Water management	New requirement requiring where <b>water is stored and handled onsite</b> (e.g. holding tanks) these shall be managed to minimise food safety risks.
4.5.2	schematic diagram	New requirement that requires water <b>source needs to be detailed</b> on the water schematic diagram.
4.6	Equipment	The equipment clause now has a statement of intent detailing: All production and product handling equipment shall be suitable for the intended purpose and shall be used to minimise the risk of contamination of product.
4.6.1	New equipment	New requirement that requires where new equipment is being purchased there needs to be a <b>documented purchase specification covering: any relevant legislation where applicable, requirements for food contact surfaces to meet legal requirements details of intended use of the equipment and the type of materials it will be handling</b> The requirement also requires that the supplier should <b>provide evidence that equipment meets these site requirements before equipment is supplied.</b>
4.6.2	<b>Equipment commissioning</b>	New requirement that requires a site to have a documented, risk-based, commissioning procedure to ensure that food safety and integrity is maintained during the installation of new equipment. The commissioning procedure shall include the update of any other site procedures that are affected by the new equipment, for example, training, operating procedures, cleaning, environmental monitoring, maintenance schedules or internal audits. The design and placement of equipment shall ensure that it can be effectively cleaned and maintained.
4.6.3	Equipment design	New requirements requiring the design and construction of the equipment shall be based on risk, to prevent product contamination. For example the use of the correct seals, impervious surfaces or smooth welds and joints, where they are exposed to product and could otherwise result in foreign-body, microbiological or allergen contamination of the product.
4.6.4	Static equipment	New requirement requiring a procedure to be in place to manage the movement of static equipment in production areas.
4.6.5	Storage of equipment	New requirements covering: equipment which is not in use or taken out of service shall be cleaned and stored in a manner which does not pose a risk to the product. Equipment stored in internal production and storage areas shall be kept clean. Food contact equipment which has been stored but is not in daily use shall be cleaned and, where necessary disinfected, prior to use.
4.6.6	Mobile equipment	New requirements covering: Mobile equipment (e.g. fork-lift trucks, pallet trucks, scissor lifts and ladders) used in open product areas

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

		shall not pose a risk to the product. Where the use of mobile equipment in external areas cannot be avoided, the equipment shall be cleaned and disinfected prior to entering production areas.
4.6.7	Battery charging equipment	New requirement requiring battery charging equipment shall not be stored in open product areas (unless the batteries are fully sealed/maintenance free) or where there is a risk to products.
4.7.1	Maintenance schedule	New requirement requiring mobile equipment to be included in the preventive maintenance schedule.
4.8.8	Catering facilities	New requirement requiring control of allergenic ingredients or introduction of new allergenic material to the site to prevent contamination of product.
4.9.1.1	Chemical control	New requirement for non-food chemicals covering: a designated storage area (separate from chemicals used as raw materials in products) with restricted access to only authorized personnel procedures to manage any spills procedures for the safe, legal disposal or return, of obsolete or out-of-date chemicals and empty chemical containers.
4.9.5.1	Control of wood	New requirements requiring where the use of wood cannot be avoided, the condition of wood shall be continually monitored on a risk-based frequency. Additional text clarifying use of wood in a food production environment.
4.9.6.2	Use of Pens	Original clause requirements have been expanded to provide additional clarification on the use of pens and similar portable items.
4.9.6.3	Foreign body contamination	Based on risk, procedures shall be implemented to minimise other types of foreign-body contamination (i.e. types of contamination that are different from those detailed in section 4.9).
4.10.3.4	Metal detection	New requirements requiring where the test piece shall be passed as close as possible to the least sensitive area of the metal detector (usually the center of the metal detector aperture).
4.10.3.5	X-ray equipment	New clause detailing what needs to be covered in a x-ray equipment testing procedures covering: use of test pieces incorporating a sphere of suitable material (e.g. a typical contaminant) of a known diameter selected on the basis of risk. The test pieces shall be marked with the size and type of test material contained tests carried out using separate test pieces a test to prove that both the detection and rejection mechanisms are working effectively under normal working conditions tests of the X-ray detector by passing successive test packs through the unit at typical line operating speed checks of failsafe systems fitted to the detection and rejection systems. In addition, where X-rays are incorporated on conveyors, the test piece shall be passed as close as possible to the least sensitive area of the X-ray Wherever possible, the test piece shall be inserted within a clearly identified sample pack of the food being produced at the time of

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

		<p>the test.</p> <p>Where in-line X-ray detectors are used, the test piece shall be placed in the product flow wherever this is possible and the correct timing of the rejection system to remove identified contamination shall be validated.</p> <p>Testing of in-line detectors shall be completed during both line start-up and at the end of the production period.</p>
4.10.4.1	Magnets	Clarification added covering inspection, cleaning, strength testing and integrity checks of magnets are only required where magnets are used for final product testing.
4.10.5.1	Optical sorting equipment	Clarification added covering testing of equipment only required where optical sorting equipment is used for final product testing.
4.10.7.1	Other foreign body detection equipment	New clause requiring where other foreign-body detection and removal equipment, such as gravity separation, fluid bed technology or aspirators, are used they shall be checked in accordance with the manufacturer's instructions or recommendations.
4.11.2	Cleaning procedures	Clause has been expanded to include disinfection procedures shall be in place and maintained for the building, plant and all equipment.
4.11.7.4	CIP Facilities	Additional requirements to <b>check spray balls are operating correctly.</b>
4.11.8.2	Environmental monitoring controls	The existing clause has been expanded to include: Appropriate control or action limits shall be defined for the environmental monitoring programme.
4.12.3	Waste disposal	New requirements requiring waste disposal from open product areas shall be managed to ensure that it does not compromise product safety.
4.13..1	Management of surplus food	New requirements requiring where products are sold to staff or passed on to charities or other organizations then traceability needs to be maintained.
4.14.10	Pest management survey	There is a change in terminology from survey to assessment and control expert to management expert.
<b>Clauses 5: Product control</b>		
<b>Clause</b>	<b>Clause subject</b>	<b>Details of main changes</b>
5.1.1	New product development procedure	Additional text detailing new product development procedures needs to cover new product development and changes to existing product, packaging and manufacturing processes.
5.2.1	Labelling artwork	New requirements requiring the company shall have a procedure for artwork approval and sign-off.
5.3	Management of allergens	An introductory statement added providing clarification on allergens in pet food.

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

5.4.1	Vulnerability assessment	New requirements requiring personnel involved in vulnerability assessments shall understand potential food fraud risks. This shall also include knowledge of raw materials used by the site and the principles of vulnerability assessment.
5.4.3	Vulnerability assessment	Additional text added detailing when Vulnerability assessment needs to be reviewed covering: <ul style="list-style-type: none"> <li>– A change in raw material or a supplier of raw materials</li> <li>– Emergence of a new risk (e.g. known adulteration of an ingredient)</li> <li>– Developments in scientific information associated with authenticity of the site’s products</li> <li>– Raw materials, for example, information obtained as part of clause 1.1.8)</li> <li>– Following a significant product safety incident (e.g. a product recall)</li> <li>– Where the authenticity of the site’s products or raw materials is implicated</li> </ul>
5.4.7	Product claim	New requirements requiring where a product is designed to enable a claim to be made, the company shall ensure that the product formulation and the production process are fully validated to meet the stated claim and any legal requirements (in the country of intended sale) relating to the claim.
5.5.1	Purchasing primary packaging	The requirement now requires that packaging suppliers are made aware of existing packaging being used by the site covering recyclable or reusable packaging materials.
5.6	Product Inspection	The statement of intent title has been changed to 5.6 Product inspection, product testing and laboratory analysis.
5.6.1	Product testing	New requirement requiring processes for obtaining product samples including where appropriate, their delivery to a laboratory.
5.6.2	Test and inspection results	New requirements requiring where legal limits apply, these shall be understood by the site and appropriate action taken promptly these limits are exceeded.
5.6.5	Onsite testing laboratories	New requirements requiring controls shall be documented, implemented and include consideration of: <ul style="list-style-type: none"> <li>– Hygiene and protective clothing arrangements</li> <li>– Movement of materials that may pose a risk to products, raw materials or the production area, into and out of the laboratory, including the disposal of laboratory waste</li> </ul>



## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

		<p>– The management and monitoring of laboratory equipment</p> <p>Also where testing activities are performed in production or storage areas (e.g. at the line tests or rapid tests) these shall be located, designed or operated to prevent product contamination.</p>
5.6.2.5	Laboratory results	This clause has been removed and requirements can be found in clause 5.6.2.
5.8	Pet food	<p>Statement of intent title has changed to 5.8 Pet food and animal feed.</p> <p>Additional text detailing all sites that produce pet food or animal feed need to meet all the relevant requirements from sections 1–7 of the Standard as well as section 5.8.</p> <p>Also the term animal feed has been referenced in clauses 5.8.1, 5.8.2, 5.8.3 and 5.8.4 e.g. pet food or animal feed.</p>
5.8.3	Pet food medication	<p>New requirements requiring the following additional controls when dealing with pet food medicated raw material:</p> <ul style="list-style-type: none"> <li>– Supplier approval process required equivalent to section 3.5.1 for all medicated raw materials</li> <li>– Specific staff training on the correct handling of medicated materials</li> <li>– Waste disposal mechanisms (see section 4.12) include the safe and legal disposal of medicated raw materials and products.</li> </ul>
5.8.4	Pet food and animal feed legislation	New requirements requiring site procedures to be designed and implemented to meet the relevant pet food and animal feed product safety legislation in the country of production and in the country of sale.
5.9	Animal Primary Conversion	<p>New clause with the following statement of intent:</p> <p>Where a site completes animal primary conversion (e.g. for red meat, poultry or fish) the following requirements apply, in addition to those within the rest of the Standard.</p> <p>For animal primary conversion, the site shall operate controlled processes that ensure products are safe and fit for intended use.</p>
5.9.1	Risk Assessment	<p>New requirements requiring sites to undertake a risk assessment, for potential prohibited substances (i.e. those prohibited by legislation in the country of operation or intended country of sale). Example substances include pharmaceuticals, veterinary medicines (e.g. growth hormones), heavy metals and pesticides.</p> <p>The results of the risk assessment shall be included in raw material acceptance and testing procedures and for the processes adopted for supplier approval and monitoring.</p>

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

5.9.3	Traceability	New requirements requiring the site to operate procedures to ensure the traceability of all edible parts of the carcass.
5.9.4	Time and temperature	New requirements requiring the site to establish defined time and temperature requirements for all post-slaughter processes. These requirements shall be defined for all chilled or frozen, edible parts of the carcass.
<b>Clause 6 Process Control</b>		
<b>Clause</b>	<b>Clause subject</b>	<b>Details of main changes</b>
6.1.1	Process specifications and work instructions	The list of specifications/procedures has been expanded to include: storage conditions (e.g. storage temperatures)  There is also a requirement that the site shall review the process specifications and work instructions/procedures prior to any changes which may affect food safety.
6.1.7	Product handling	New requirement that requires where a site handles products or materials (e.g. by-products from production processes) that are outside the scope of the audit, these shall be controlled to ensure that they do not create a product safety, authenticity or legality risk to products within the scope.
6.2.1	Allocation of packing materials	New requirement that requires the site to have processes in place to check label use is reconciled with expected use and the cause of any inconsistencies investigated.
6.3.3	Testing online check weighers	The requirements for the online check weighers has been expanded to include: processes for handling rejected packs.
<b>Clauses 7: Personnel</b>		
<b>Clause</b>	<b>Clause subject</b>	<b>Details of main changes</b>
7.3	Medical screening	Statement of intent has been reworded to include “transmission of infections, diseases, or conditions”.
7.4.3	Laundering	Additional text added to clarify when an employee can wash their own PPE e.g.  Washing of protective clothing by the employee is exceptional but shall be acceptable where:  – the protective clothing is not used for product safety purposes, for example, it is used to protect the employee from the products handled  – and the protective clothing is worn in enclosed product or low-risk areas only.
<b>Clause 8: High-risk, high-care, and ambient high-care production risk zones</b>		
<b>Clause</b>	<b>Clause subject</b>	<b>Details of main changes</b>

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

8	Statement of intent	<p>Statement of intent title has changed to 8 Production risk zones – high-risk, high-care, and ambient high-care production risk zones.</p> <p>Additional text clarifying that all the relevant requirements from sections 1–7 of the Standard must be fulfilled in addition to the requirements in this section.</p>
8.1.1	Risk zones	<p>Section has been removed and the following statement added:</p> <p>The map of the site (see clause 4.3.2) now has a requirement to detail the location of the pathogen control step(s).</p>
8.1.3	High care	<p>The clause has been expanded to include the procedures for changeover from low risk to high-care need to be validated when validating processes for potential of cross contamination.</p>
8.2.3	Removable walls	<p>New requirement that requires where sites have removable walls there needs to be procedures covering:</p> <ul style="list-style-type: none"> <li>– Removable walls are tight fitting</li> <li>– Use of removable walls is controlled</li> <li>– Movement of the wall is only completed by trained and authorised staff</li> <li>– Cleaning and reconditioning procedures are in place and completed prior to production.</li> </ul>
8.3	Clause title	<p>The clause title has been changed to: 8.3 Equipment and Maintenance in high-risk and high-care zones.</p>
8.3.3	Portable equipment	<p>The clause has been expanded to include battery charging equipment.</p>
8.5.1	Cleaning procedure	<p>Reference to items that need to be included in a cleaning procedure have been removed and a cross reference to clause 4.11.2 added detailing what needs to be in a cleaning procedure.</p> <p>There is also a new requirement that Environmental cleaning procedures in high-care/high-risk areas shall consider the different microbiological risks associated with each production risk zone.</p>
8.5.3	Cleaning equipment	<p>Requirements for cleaning equipment in high-care and high-risk areas has been expanded to include:</p> <ul style="list-style-type: none"> <li>– Hygienically designed and fit for purpose</li> <li>– Cleaned and stored in a hygienic manner to prevent contamination (for example storing equipment in designated locations, off the floor, when not in use).</li> </ul>
8.5.4	CIP Equipment	<p>New clause covering:</p> <p>Where the site uses CIP equipment, this will either be dedicated to</p>

## Briefing note – BRCGS Global Standard Food Safety Issue 8 to 9

		the area or the CIP system shall be designed and controlled so that it does not present a risk of contamination to the high-risk/high-care area.
<b>Clause 9: Requirements for traded products</b>		
<b>Clause</b>	<b>Clause subject</b>	<b>Details of main changes</b>
9	Statement of intent	<p>Additional text added providing overview of what is meant by the term traded products.</p> <p>Also additional requirement have been added to clause 9 covering:</p> <ul style="list-style-type: none"> <li>– Where a site wishes to be audited against section 9 of the Standard, all of the food products and food raw materials traded must be included within the audit scope. It is not permitted to include some traded food products or food raw materials and exclude others.</li> <li>– Non-conformities against clauses within section 9 of the Standard will be recorded on the audit report and included in the calculation of the site's grade.</li> <li>– Where a site has traded food products or food raw materials onsite but wishes them to be excluded from the scope of the audit, this will be recorded as an exclusion from scope on the audit report.</li> </ul>
9.1.1	HACCP Plan	<p>Additional requirement requiring sites to either:</p> <ul style="list-style-type: none"> <li>– Have a HACCP or food safety plan specifically for the traded products handled onsite</li> </ul> <p>or</p> <ul style="list-style-type: none"> <li>– Incorporate the traded products into its existing HACCP or food safety plans (see section 2).</li> </ul> <p>Also the scope of traded products HACCP or food safety plan shall include the products and the processes for which the site is responsible, as a minimum this will include goods receipt, storage and dispatch.</p>
9.6.1	Traceability	Additional requirements requiring the site's traceability procedure (see clause 3.9.1) shall include details of the system used for the traceability of traded products.