



BRC Global Standard For Ethical Trade & Responsible Sourcing: Issue 1 Consultation Draft Feedback Form

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If you have comments about the draft ETRS Standard Audit Protocol, please include the step number (1-4), page number and comment below.

ETRS Standard Audit Protocol	Comment
Step 1	<p>It appears that involvement with BRC would be stand alone . One of the great benefits of SEDEX is the ability to share information up and down the chain. The BRC GS should consider this.</p> <p>It is not clear what the differences are in the “Audit” types and so difficult to comment however it is difficult to understand the role of anything other than the full audit. What would BRC GS think about a Food Safety bolt onto an ethical audit?</p> <p>There is no mention of the suitability or training of the auditor?</p>
Step 2	Specifies trade union as a key stakeholder, elsewhere quite correctly the standard recognises there are other legitimate worker representatives and not just unions.
Step 3 / 4 non-conformances and corrective actions	<p>This approach is OK for some areas that might be picked up by audit. However, this type of audit can find evidence of some challenging issues e.g. harassment and bullying. It is ludicrous to suggest that such things can be addressed in these time scales, to do so would encourage a sticking plaster as opposed to root cause analysis and tackling these.</p> <p>The constant revisiting might be seen as an diligent but it may not be useful. No supplier would want to appear as high risk but in some parts of the world cultural challenges will mean they are.</p>
Overall Comments	The approach taken in the document seems to indicate a gross misunderstanding of the complexity and challenges faced in social and ethical space. Things are seldom black and white, which is why social auditing schemes such as SEDEX have not used grading but NC management. The ETI from the very beginning was clear there was no pass or fail just an obligation to work constructively to improve the situation. The approach outlined could led to a focus on audit score and the optics to improve quickly rather than the real issues.

If you have comments about the draft ETRS Standard, please include the Statement of Intent reference or clause / sub-clause number, page number and comment below.

ETRS Standard Requirement	Comment
Section 1	Much of the management of Ethical Trade is about HR management however the standard does not seem to recognise role nor the professionals who in it. Operations and H&S are mentioned but not HR?

Section 2	The proposed use of internal audit to verify ethical trade requirements is interesting however it is a management driven activity. Effective worker representation is a much more effective way of verifying implementation to rules and so consideration should be given to if promoting IA in the standard is a good thing?

If you have comments about a specific definition of the draft ETRS Standard, please include the definition name, page number and comment below.

ETRS Standard Definitions	Comment
Legality	This references the country of operation and country for intended sale ie for products to be sold in UK all UK laws to be followed?

Please return to enquiries@brcglobalstandards.com by **10 February 2019**.

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