

# TOP BRCGS FOOD SAFETY NON-CONFORMITIES 2025-2026

## WHAT THE DATA IS TELLING US

**72,000+**  
AUDITS  
ANALYSED



**15,000+**  
FINDINGS ON A  
SINGLE CLAUSE



**80%**  
OF SITES AVOID  
THE TOP ISSUE



### HYGIENE (CLAUSE 4.11.1) #1 GLOBAL NON-CONFORMITY

- Premises and equipment not consistently clean
- Build-up in hard-to-reach areas
- Inconsistent cleaning routines

**INSIGHT** Not a system failure – a consistency failure.

### DOORS AND PEST PREVENTION (CLAUSE 4.4.0.8)

- Doors left open
- Poor condition or sealing

**INSIGHT** Pest issues start with access, not infestation.

### CHEMICAL CONTROL (CLAUSE 4.9.1.1) 10,000+ FINDINGS

- Unlocked storage
- Poor labelling
- Chemicals too close to production

**INSIGHT** Basic controls overlooked, high contamination risk.

### WALLS, CEILINGS AND FLOORS (4.4.0.1) (4.4.0.4) (4.4.0.2)

- Damaged or hard-to-clean surfaces
- Dirt accumulation and condensation
- Poor maintenance

**INSIGHT** The environment defines the risk.

### EQUIPMENT RISK MANAGEMENT (CLAUSE 4.6.0.2)

- Weak or missing risk assessments
- Poor commissioning processes
- Gaps in hygienic design understanding

**INSIGHT** New equipment = new risks – often underestimated.

### TRACEABILITY AND LABELLING (CLAUSE 3.9.0.2)

- Missing or unclear labels
- Poor identification of materials

**INSIGHT** Traceability fails in practice, not policy.

## WHAT CONNECTS THEM?

Seven of the eight most common non-conformities sit within Section 4 – Site Standards.

The physical environment plays a central role here. Floors, walls, ceilings and equipment are not just part of the setting; they shape how effectively contamination is controlled.

When they are well maintained, they support food safety. When they are neglected, even slightly, they begin to work against it.

What makes these areas difficult to manage is how often they rely on routine action. These are controls carried out continuously, across shifts, by different people, under time pressure. Small lapses are easy to miss in the moment, but over time they build into patterns that auditors can clearly see.

That is why these non-conformities persist. They are not the result of sudden breakdown, but of gradual loss of control in the everyday.

Why it matters: these are the controls most exposed to daily pressure – and most likely to drift.

### WHY IT MATTERS

These are the controls most exposed to daily pressure – and most likely to drift.

## BEYOND THE TOP 8: HIDDEN WEAKNESSES

Outside of site standards, a consistent set of non-conformities appears in core system elements:

- **HACCP (incomplete process flows and hazard identification)**
- **Document control**
- **Internal audit scope and frequency**
- **Food safety culture requirements**
- **Protective clothing definitions and control**

These are not high-frequency clauses compared to Section 4, but they are recurring.

What this indicates is variability in how requirements are interpreted and applied at site level.

For example, HACCP non-conformities are often linked to incomplete process mapping rather than incorrect methodology, internal audit findings are typically related to scope definition and scheduling, rather than absence of an audit programme and food safety culture non-conformities tend to reflect incomplete plans against clause requirements, not a lack of intent. In each case, the requirement exists and is recognised. The gap sits in detail, completeness or alignment to the clause.

This is a different risk profile to site standards. Site standards findings are operational and visible. These findings are systemic and procedural. They become significant where they limit the site's ability to identify issues proactively, or where they result in partial compliance against defined requirements.

### INSIGHT

Process discipline is quietly slipping.

## WHAT THIS MEANS FOR YOUR SITE

- ✓ **Focus on fundamentals, not complexity**
- ✓ **Strengthen day-to-day operational discipline**
- ✓ **Use internal audits as a live management tool**
- ✓ **Address root cause – not just the symptom**

## WORKING WITH LRQA

With more than 40 years of sector expertise, LRQA is the trusted global risk management partner to the food and beverage sector.

We support you to:

- ✓ **Identify recurring risks through auditor-led insight**
- ✓ **Strengthen root cause analysis and corrective action**
- ✓ **Embed effective internal audit programmes**
- ✓ **Improve site standards and operational consistency**
- ✓ **Prepare for evolving BRCGS requirements, including issue 10**

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## ABOUT LRQA

LRQA is a leading global risk management partner.

Through our connected risk management solutions, we help you navigate an evolving global landscape to keep you one step ahead.

From certification and cybersecurity, to safety, sustainability and supply chain resilience, we work with you to identify risks across your business. We then create smart, scalable solutions, tailored to help you prepare, prevent and protect against risk.

Through relentless client focus, backed by decades of sector-specific expertise, data-driven insight and on-the-ground specialists across assurance, certification, inspection, advisory and training, we support over 61,000 organisations in more than 150 countries.

LRQA – Your risk management advantage.

## GET IN TOUCH

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