1. About the audit

1.1 What are the Fields of Audit?

The Packaging Standard identifies eight manufacturing technology fields:

1. glass manufacture and forming
2. paper making and conversion
3. metal forming
4. rigid plastics forming
5. flexible plastics manufacture
6. other manufacturing
7. print processes
8. chemical processes

These fields of audit are important to ensure the auditor is sufficiently qualified in for the area in which they will audit.

1.2 What is the Packaging Hygiene Category?

The Packaging Standard defines two product hygiene categories that affect the detail of the requirement clause, based on the hygiene requirement of the application of the packaging. Broadly speaking, the high hygiene category has requirements applicable to packaging that’s intended to come into direct contact food and other hygiene sensitive products. The basic hygiene category has requirements applicable to packaging used for non-food primary packaging, such as consumer products, and secondary and tertiary packaging for all uses.

The packaging category should be determined and agreed with the certification body and any relevant customers prior to the audit taking place. An [explanation sheet] (link to hygiene category determination decision tree) has been developed to help in establishing the packaging hygiene category.

1.3 How often will I need to be audited against the Standard?

The frequency of the audits depends upon the number and type of non-conformities identified at the audit and the subsequent grade awarded to the site. If your site is awarded an AA, A or B grade the audit frequency is 12 months. Where sites are awarded a C or D grade the audit frequency is 6 months and sites with grade D will require a revisit to close their non-conformities. Sites not allocated a grade are not certificated and must start a new full audit cycle.

1.4 We already have ISO 9000. What is different about the BRGS /IOP Standard?

The BRGS Standard includes many of the Quality Management systems of the ISO Standard but is extended to provide a more prescriptive framework for risk assessment, hygiene and quality control. The standardised report format provides information to customers to demonstrate how the site complies with the Standard.

1.5 How long will the audit take?

The length of the audit will depend on the size and complexity of your operations. Expect a typical audit to take 1.5 days (at 8 hours per working day) on site, with another half day to produce a detailed report.
1.6 How quickly will I get my Report/Certificate?

At the end of the audit the auditor will provide a written summary of any non-conformities identified. Sites are then allowed 28 days to provide evidence that they have completed any actions identified at the audit. A further 14 days are allowed for the certification body to review the information, complete the report and make a certification decision. In total 42 days should be allowed between the audit and issue of a certificate.

1.7 I have had a BRGS audit and am not happy with the non-conformities identified – what can I do?

Your company has the right to appeal the certification decision made by the certification body, which should be made in writing to the certification body within 7 days of the decision. The certification body will give a full written response within 30 days following a full and thorough investigation. The company also has the option to contact the BRGS if the two parties cannot attain resolution.

1.8 What is the Global Markets programme and how do I know if it’s right for me?

Issue 5 sees the launch of the Global Markets programme, to provide opportunities to recognise and encourage the development of product safety and quality management systems in small sites where the full requirements of the Standard may add less value, and in sites that are still developing management systems. The new Global Markets programme will enable audits and recognition against a set of requirements of the Standard identified as basic level, and a further set of requirements at intermediate level.

You can view the BRCGS Standard for Food Safety Issue 7 and Global Markets programme as well as the Interpretation Guideline, supporting publications and additional resources quickly and easily via BRGS Participate, our online subscription platform. BRGS Participate is an innovative and powerful online management system that gives you immediate access to all the documents relevant to a particular Standard, linking them clause by clause. To find out more and to subscribe, visit BRGS Participate.

Printed copies and PDF downloads of the Standard can still be purchased from the BRGS Bookshop, with the Standard and Global Markets programme available to download free of charge.

1.9 What are AVMs?

Additional Voluntary Modules (AVMs) are additional, optional modules that address topics related to the scope of the Standard. These have been developed as a result of a need identified by a retailer or brand owner, or where the requirements are not in line with the product safety and quality management focus of the Standard. A list of AVMs can be found on the BRCGS website.

2. Clause Clarification

2.1 What would you expect to see for a risk assessment, since the Standard now bases many of the requirements on this?

The principles and objectives behind a ‘risk assessment’ are to ensure your company has considered the issues pertinent to the requirements and can justify the reasons for your policy or procedures. In some instances it would be appropriate to have a
detailed document (along the principles of a hazard and risk analysis plan) showing these considerations. An example may be the risk rating for suppliers and the subsequent approval process. Or the risks to products from physical contamination, which would be included within the hazard and risk analysis plan.

However, other requirements - such as the policy on where beard snoods shall be worn - could be evidenced in other ways such as a documented policy showing staff understanding and the reasoning behind this policy. This would include considerations of best practice within the industry and be open to being challenged by an auditor.

The need for a documented risk assessment would be particularly pertinent where it has been determined not to adopt procedures for a particular requirement e.g. not wearing beard snoods in a particular area.

2.2 What is defined as a current issue of the Standard as required by clause 1.2.7

It’s vital for sites to have a copy, or access to BRGS Participate, so that they understand fully what the requirements are that they are being audited to. This must not be a photocopy or an unauthorised version and should be made available to all relevant staff to ensure they understand the Standard’s requirements.

You can obtain a copy of the Standard, which is available in several languages, in print or as a free PDF download from the BRGS Bookshop, or a current subscription to BRGS Participate is also acceptable as evidence of access to the Standard.

2.3 How many people should make up the Hazard and Risk Management Team and what training do they require?

The number of people on the Hazard and Risk Management Team should be appropriate for the size and structure of the company, and should include representatives from each department with responsibility for operation of the Standard. It shouldn’t be too large, and note that one person does not constitute a team. Team members are expected to have appropriate training, especially the team leader. This may be achieved through external, industry recognised training, specific to HACCP/hazard analysis, or through a good quality internal course.

At the audit, the competency and understanding of the Hazard and Risk Management Team is assessed as well as the quality of the resultant hazard and risk management plan. Note that if the hazard and risk management plan has been prepared with the help of an external consultant, internal staff must still be fully conversant with the plan, principles and practices associated with it. Records also to demonstrate the training of the external consultant in HACCP/hazard and risk management principles.

2.4 What documentation do you need to keep for hazard and risk management?

You need to ensure that the information, which you base the hazard and risk management plan on, is referenced and available on request by the auditor. This may include published literature on known hazards, codes of practice or legislation. You need to keep records of hazard and risk management team meetings and the decisions that were reached. You should also have documents to demonstrate how the decisions for establishing CCPs were reached.
2.5 What training do internal auditors need to have completed and what does ‘independent of the activity’ mean?

Internal auditors need to be able to show that they have received formal training either via an external course or training within the company. Training should cover areas such as the planning and scheduling of internal audits, preparing reports and follow-up of audit findings.

Auditors must be independent of the activity being audited to ensure the audit is rigorous and thorough and is not influenced by the work that may need to be carried out to effect corrections and improvements. Auditors should not be biased or influenced. External auditors may need to be used where there are insufficient internal resources.

2.6 What languages is the Standard available in?

The Standard is currently available in English, French, Italian and German, Spanish and Chinese, and a copy is also available for the North American market.

2.7 What is the grading system and what does it mean?

The number and type of non-conformities identified during an audit generally reflects the extent and effectiveness of the implementation of the requirements of the Standard by the site.

BRGS introduced the grading system to Issue 4 of the Standard in order to offer sites the opportunity to better reflect the level of conformity with the site.

<table>
<thead>
<tr>
<th>Grade announced</th>
<th>Grade unannounced</th>
<th>Critical</th>
<th>Major</th>
<th>Minor</th>
<th>Corrective actions</th>
<th>Audit frequency</th>
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<tr>
<td>AA</td>
<td>AA+</td>
<td></td>
<td></td>
<td>5 or fewer</td>
<td>Objective evidence within 28 calendar days</td>
<td>12 months</td>
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<tr>
<td>A</td>
<td>A+</td>
<td></td>
<td></td>
<td>6 to 10</td>
<td>Objective evidence within 28 calendar days</td>
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<tr>
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<td></td>
<td>11 to 16</td>
<td>Objective evidence within 28 calendar days</td>
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<tr>
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<td>1</td>
<td>10 or fewer</td>
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<td>Objective evidence within 28 calendar days</td>
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<tr>
<td>C</td>
<td>C+</td>
<td>17 to 24</td>
<td></td>
<td></td>
<td>Objective evidence within 28 calendar days</td>
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<tr>
<td>C</td>
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<td>11 to 16</td>
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<td>Objective evidence within 28 calendar days</td>
<td>6 months</td>
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</tbody>
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2.7 During the audit, the auditor identified a major non-conformity against the statement of intent of a fundamental clause. What does this mean?

Fundamental clauses are those that are crucial to the running of a safe and effective operation and must be demonstrably in place. If the auditor identifies that these fundamental requirements are not in place and effective, then a major non-conformity is raised and your audit will result in non-certification. A major non-conformity against the statement of intent of a fundamental clause has the same implications as a critical non-conformity in the grading table.

2.8 My audit revealed two major non-conformities and seven minor non-conformities and my site received a C grade. If we close out all of the non-conformities in time for the revisit, will my grade improve?

No. The grade is allocated according to the non-conformities identified on the day of the audit and cannot be changed. The purpose of closing the non-conformities is to ensure that the site is compliant with the requirements of the Standard.

2.9 My factory uses a range of materials in various fields of audit. Do I need more than one audit?

No. The certification body will send an auditor or audit team that has the experience to cover a range of materials. It’s important to inform the certification body about the required scope to ensure that auditors have the right skillset.
2.10 I do not make packaging but I am a contract packing company packing goods for other people. Is the Packaging Standard for me?

No. The Packaging Standard is for packaging manufacturers and converters only. But you may find the BRCGS Standards for Food or Consumer Products suitable.

2.11 My company is large with lots of sites all over the world – we have a head office with design and purchasing responsibilities and a number of manufacturing sites. Do I need an audit at each site?

Yes. Each site will need to be audited as an audit is site-specific. Each site is audited and the certificate granted accordingly. However there are some provisions for multi-site operations that are in proximity to each other. These can be found in the Standard.

2.12 What other documents and support are available for the BRCGS Standard for Packaging and Packaging Materials, Issue 5?

The Standard has an accompanying Interpretation Guideline that is available from the BRGS Bookshop or via a BRGS Participate subscription.

Support is also available from the BRCGS Technical Team who can be contacted by emailing enquiries@brcgs.com.