

**ISSUE 6
PACKAGING
MATERIALS**

**Frequently
Asked
Questions**

FREQUENTLY ASKED QUESTIONS
FAQs

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Introduction

A new issue of the Standard often generates questions as sites, certification bodies and specifiers ensure they understand the new requirements. The most frequently asked questions relating to Issue 6 of the Global Standard for Packaging Materials are detailed below.

BRCGS also operate an enquiry service. If you are unable to find an answer to your particular question, then please contact enquiries@brcgs.com

General questions – background

Why has Issue 6 been introduced?

Issue 6 was introduced to respond to evolving stakeholder requirements for increased transparency in supply chains and an effective response to emerging issues. Therefore, the requirements of the Standard now include the development of good manufacturing practice in product safety and quality culture. An enhanced hazard analysis and risk assessment approach to hygiene and printed packaging controls. An additional module on plastic pellet loss prevention has been introduced to address the alarming levels of pre-production materials polluting the environment.

About the protocol

What are the manufacturing categories?

The Packaging Standard identifies sites according to eight manufacturing categories which are used to ensure that sufficiently competent auditors are selected to conduct the audit.

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

Why have the basic hygiene and high hygiene levels been removed?

Previous issues of the Standard recognised two levels of hygiene requirements, basic and high, to reflect the different manufacturing processes and usage of materials produced. In practice, usage of the basic hygiene requirements has decreased as customers require greater assurance, and the differences between the two levels have decreased with each new issue of the Standard. Following consultation and agreement, in Issue 6 of the Standard, the basic- and high-level hygiene requirements were consolidated into one level. Sites are now fully responsible for developing a risk-based hygiene programme tailored to their needs and customer expectations.

As a basic hygiene site, do we have to comply with all the hygiene requirements in Issue 6?

BRCGS have published a transition guide to help identify the additional hygiene clauses that are new to their operations in order to comply with the requirements of the Issue 6. It is important for basic hygiene level sites there is flexibility outside full compliance. Some clauses may not be applicable to the site operations or building fabric. In addition, on the basis of a documented risk assessment, the site may not be required to comply to other clauses. It would be advisable to use the transition guide in conjunction with the self-assessment tool.

We are currently certificated as low risk under BRCGS Packaging and Packaging materials issue 5 and have a decision tree within our HACCP documentation. Is there one for Issue 6?

No. The decision tree is obsolete and is not required for Issue 6 because the hygiene levels have been consolidated and are based on risk.

What has happened to the Global Markets Programme?

Global Marketing for Packaging 5 is now obsolete and is not relevant for Packaging Materials 6.

Is there a START! programme for Packaging?

Currently there is no START! programme for Packaging until there is sufficient specifier interest.

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.

Additional time will still be required for any modules that are added to the audit.

I have had a BRCGS 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 BRCGS directly if the two parties cannot attain resolution.

What has happened to the unannounced audit? Will the GFSI rule apply?

Unannounced audits will continue with Issue 6 and will now be available as a single unannounced option. The GFSI requirements for an unannounced audit every three years will apply.

Has anything changed in the scope requirements for Issue 6?

The scope requirements remain the same and should include the use words to describe the key processes, the types of packaging materials being made and their intended use. In addition, any subcontracted activities and outsourced processes must be stated.

If the audit is delayed by less than 7 days, it will not be a major non-conformity. Is it true?

No. Clause 1.1.7 in the Standard says where the site is certificated to the Standard, it shall ensure that recertification audits occur on or before the audit date indicated on the certificate. So the site is responsible for contacting the certification body to agree a renewal date. If the site fails to do this, then it could receive a major non conformity at the next audit. Where a suitable date cannot be found within the audit window, the certification body can apply to the BRCGS for a concession.

Which Standard do the following operations fall under?

- Injection molding of spoon, fork and plastic knives for food contact.
- Slitting of paper tissue for food contact purposes.

Both operations fall into the consumer products Standard. This is because the Standard requires sites to address the additional product hazard analysis and risk assessment around end use by the consumer to ensure that finished product is safe, legal within the specified quality.

What languages is issue 6 of the Standard available in?

The Standard is currently available in English, French, Italian and German, Spanish and Chinese. These can be found in the BRCGS Bookshop or Participate.

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. Depending on the type of products being packed, BRCGS Food or Consumer Products may be more suitable for your operations.

What other documents and support are available for the BRCGS for Packaging and Packaging Materials, Issue 6?

The following supporting publications are available on BRCGS Bookshop and Participate, Interpretation Guidelines and Key Changes for Issue 6. There is also a Transition Guide to enable basic level hygiene sites to identify any additional hygiene requirements for issue 6.

Please email BRCGS Technical Team at enquiries@brcgs.com for further support.

About the requirements

Does clause 5.9.5 mean pallets can no longer be stored outside?

No. Pallets if and when stored outside of the building have to be protected from damage (physical/the elements/etc). The Standard does not specify how this should be done and leaves this to the discretion of site management. When brought back in for use, pallets need to be inspected to ensure that there has not been any damage that would compromise the integrity and safety of the intermediate and finished products.

What should be included in a product safety and culture plan and when should this be in place?

The Standard contains clear guidance. Safety culture starts with senior management commitment; sites will need an effective plan showing continuous improvement across their business.

Introduced in Issue 6, the audits against clause 1.1.2 will not be effective until February 2021 to give sites a chance to prepare for the audits.

How does a packaging site comply with the new clause 4.8.5 relating to microbial environmental monitoring?

The site will need to demonstrate that they have an effective risk assessment in place which determines whether a microbiological environmental monitoring programme is required. If it is required, the auditor will be looking for objective evidence that confirms the cleaning and hygiene procedures are effective against the survival of microorganisms during production, storage, dispatch and use of packaging materials.

We do not produce packaging materials for food, is it necessary to implement regular environmental monitoring?

If the site has determined that the risk to the final packaging materials is low and there is no need for an ongoing environmental monitoring programme, then the auditor will need to see the objective evidence. This evidence would be a documented hazard analysis and risk assessment (HARA).

Is metal detection still required by the Standard for the finished packaging materials?

There is no direct requirement for metal detection in the Standard but there is a requirement in section 2.2 to assess the hazards relating to product safety and legality which may lead to instances of controlling metal contamination through metal detection as required in section 5.6.

Do sites certificated to BRCGS Packaging Materials Issue 6 still need to be audited against the Audit One Module?

The new Issue 6 of Packaging Materials Standard has been fully recognised by Audit One. Therefore, Audit One suppliers will no longer need to comply with the additional module 9. As of Feb 1 2020, in conjunction with commencement of audits against BRCGS Packaging Materials Issue 6, all existing Audit One packaging sites will need to comply with the BRCGS Packaging Materials Issue 6 requirements only.

This new approach further solidifies BRCGS as the premier program, globally recognised to provide assurance to brand owners of the manufacture/supply of quality packaging materials that are safe, legal and authentic. This will allow for a much simpler certification process for the participating brands and sites alike.

Are beard snoods required where the majority of packaging materials are intended for non-food contact?

Yes. Beard snoods would be a requirement if there is no possibility of segregating the food contact from non-food contact areas of production.

What are traded products?

Traded products are goods that are not manufactured or further processed on site but bought from an outside supplier, stored at the site and sold on. They are often products bought in by a company to complement either a range of products manufactured or to provide a more comprehensive product range.

Packing or repacking operations are considered to be process steps therefore if products are subject to any of these activities, they cannot be described as traded goods.

Can traded products be included in the scope of the BRCGS audit?

As good practice, the requirements for traded products were incorporated into the main Standard (section 7 of the Standard) to improve transparency and ensure that the necessary controls are in place.

This section of the Standard remains voluntary, however where a site opts to include this within their audit scope, any non-conformities raised against this section will contribute towards site's overall audit grade.

If a site wishes to include traded products within the scope of its packaging materials audit, then it must notify the certification body in advance of the audit.

Which additional modules are available with the Standard?

There is a new additional module on plastic pellet loss prevention available from the BRCGS Bookshop and Participate. This module will help sites incorporate sustainable practices that identify and prevent the loss of pre production plastic to the environment.

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