

# BRCGS Standard for Packaging Materials Issue 6

## **P614 – Guidance Document on Disposable food contact packaging/consumer items**

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**Document Scope:**

The aim of this document is to provide guidelines on the most appropriate Standard to be used for the certification of manufacturing facilities producing disposable food contact packaging items.

**Change Log**

Version	Issue Date	Details
1	15/07/2020	First version

## Background

A few packaging manufacturing sites who also produced disposable plastic and paper items for use in the food service sector were certificated to issue 5 of the BRCGS Packaging and Packaging Materials Standard. The same products are also manufactured by sites certificated to the BRCGS Consumer Products Standard. Therefore, in terms of functionality, these products sit on the borderline between packaging materials and consumer products

The purpose of this document is to provide sites and Certification Bodies guidance on which Standard provides the greatest consumer protection with regards to the manufacture of this range of products and where the choice of Standard is optional.

The BRCGS Packaging Materials Standard Issue 6 is primarily intended to cover sites manufacturing **packaging materials** or the raw materials used to manufacture packaging materials. It is a GFSI benchmarked Standard.

It covers areas common to **all** BRCGS Standards e.g. Senior Management Commitment, Hazard and Risk Management, documented Quality Management systems, Good Manufacturing Practices and Personnel. There is a specific emphasis on the management of product quality, product development, functionality, and print control.

The Consumer Products Standard is intended for manufacturing sites producing non-food raw materials, components and finished products destined for purchase by the end consumers for personal use. There is no GFSI Benchmark available for non-food Consumer Products for any scheme.

Whilst this Standard also covers the areas common to **all** BRCGS Standards, it has a specific emphasis on **finished** product legality, claims substantiation and consumer safety in use (Product risk management), design, contamination control and product inspection and testing. The Standard is divided into Personal Care and Household which caters for single use/food contact/hygiene sensitive products and General Merchandise. The Standard has two levels of certification, Foundation and Higher level where, subject to scope of the site operations, the Higher level is more applicable to most of the products covered by this document.

## Objectives

It is recognised that there are some sites that manufacture both packaging materials and consumer products where the manufacturing material or technologies are the same. The objective of this document is to enable where applicable

- Compliance with specific customer requirements e.g. for GFSI recognised certification
- Reduction in audit and certification costs for sites by certification to a single, rather than multiple Standards.

- Certification to a Standard which provides a valid assurance of consumer protection and legality
- Accreditation of the certification process
- Appropriate auditor competence criteria to undertake the assessment process effectively.

## Product / Standard selection table

The table below shows common product groups and the primary Standard i.e. the Standard which is most suitable for the product type. The options summarise the conditions under which an alternative Standard may be used with appropriate justification. The site/factory is certificated dependent on the main focus of sites current operations. The list provided is not exhaustive.

**Note:** Where a Standard other than the primary Standard is used it shall be recognised that the certificate may not be accredited dependent on the Certification Body and Accreditation Body and this should be checked with the Certification Body.

Product/Product Group	Primary Standard	Options
<b>Cups &amp; Lids</b>		
Single use plastic/paper cups and lids	Either Packaging Materials or Consumer Products PCH*	<p>Packaging Materials Standard is acceptable where the purpose of the final product is for use in the food service sector <b>and/or</b> where the factory is predominantly producing packaging materials (at least 70%)</p> <p>Consumer products Standard is acceptable where the final product is purchased largely for domestic use by a consumer.</p>
Re-useable plastic, glass, metal, ceramic cups	Consumer Products	General Merchandise Higher level. These items are washed before use.
<b>Straws</b>		
Single use plastic/paper drinking straws	Either Packaging Materials or Consumer Products PCH*	<p>Packaging Materials Standard is acceptable where the purpose of the final product is for use in the food service sector <b>and/or</b> where the factory is predominantly producing packaging materials (at least 70%).</p> <p>Consumer products Standard is acceptable where the final product is purchased largely for domestic use by a consumer.</p>

Re-useable metal/plastic straws	Consumer Products	General Merchandise Higher level. These items are washed before use.
<b>Napkins</b>		
Single use Paper Napkins	Either Packaging Materials or Consumer Products PCH*	<p>Packaging Materials Standard is acceptable where the purpose of the final product is for use in the food service sector <b>and/or</b> where the factory is predominantly producing packaging materials (at least 70%).</p> <p>Consumer products Standard is acceptable where the final product is purchased largely for domestic use by a consumer.</p>
<b>Bags, Storage containers</b>		
Single Use plastic, paper, metal food bags, containers, and lids	Either Packaging Materials or Consumer Products PCH*	<p>Packaging Materials Standard is acceptable where the purpose of the final product is for use in the food service sector <b>and/or</b> where the factory is predominantly producing packaging materials (at least 70%).</p> <p>Consumer products Standard is acceptable where the final product is purchased largely for domestic use by a consumer.</p>
Bin/trash bags	Either Packaging Materials or Consumer Products PCH*	<p>Packaging Materials Standard is acceptable where the purpose of the final product is for use in the food service sector <b>and/or</b> where the factory is predominantly producing packaging materials (at least 70%).</p> <p>Consumer products Standard is acceptable where the final product is purchased largely for domestic use by a consumer.</p>
Re-useable plastic, ceramic, glass, metal containers and lids	Consumer Products	General Merchandise Higher level. These items are washed before use.
<b>Plates</b>		
Single use plastic/paper plates	Either Packaging Materials or Consumer Products PCH*	<p>Packaging Materials Standard is acceptable where the purpose of the final product is for use in the food service sector <b>and/or</b> where the factory is predominantly producing packaging materials (at least 70%).</p> <p>Consumer products Standard is acceptable where the final product is purchased largely for domestic use by a consumer.</p>
Re-useable plastic, ceramic, metal plates	Consumer Products	General Merchandise Higher level. These items are washed before use.
<b>Tablecloths/Tray Liners</b>		

Paper/plastic Tablecloths/tray liners	Either Packaging Materials or Consumer Products*	Packaging Materials Standard is acceptable where the purpose of the final product is for use in the food service sector <b>and/or</b> where the factory is predominantly producing packaging materials (at least 70%).  Consumer products Standard is acceptable where the final product is purchased largely for domestic use by a consumer.
Textile tablecloths	Consumer Products	General Merchandise
<b>Utensils, cutlery</b>		
Single use Plastic/wooden/bamboo cutlery	Either Packaging Materials or Consumer Products*	Packaging Materials Standard is acceptable where the purpose of the final product is for use in the food service sector <b>and/or</b> where the factory is predominantly producing packaging materials (at least 70%).  Consumer products Standard is acceptable where the final product is purchased largely for domestic use by a consumer.
Re-useable Plastic/wooden/bamboo metal utensils, cutlery	Consumer Products	General Merchandise Higher level. These items are washed before use.
<b>Personal Protective Equipment, PPE</b>		
Grill gloves	Consumer Products	General Merchandise
Thermometers	Consumer Products	General Merchandise
Hand sanitisers	Consumer Products PCH*	
Single use Personal protective equipment gloves, hair coverings and face masks	Consumer Products PCH*	

\* Consumer Products issue 4 Personal Care and Household