Global Standard Packaging Materials, Issue 6
P618: Position Statements for Issue 6

Document Scope

Where clarification of interpretation of a requirement of the Global Standard Packaging Materials, Issue 6 or its protocol is necessary this will be published on the BRCGS website (www.brcgs.com) as a Position Statement. Such statements are mandatory in their use from the date specified for implementation or the date of publication on the BRCGS website, where no date is specified.

Change log

Version no.	Date	Description
1	04/03/2021	First issue of document containing all position statements relevant to the Global Standard Packaging Materials, Issue 6. P614, P616, P617 and P552 are now obsolete.
1.1	05/03/2021	Minor amendment made to the title of the document.
2	26/05/2021	Correcting typing error in Standard under protocol 2.3.2 – 90 days is permitted at all initial audits for close out of NCs irrespective of severity. Minor amendments made to document to meet BRCGS brand guidelines.
3	17/03/2023	Position Statements added: 6. Changes to unannounced audit protocol for non-audit days and re-audit dates. 7. Changing the certification body for a re-audit.
4	21/12/2023	Position Statements added- 8. Clause 1.1.7- Update of site responsibility to ensure unannounced audits can be undertaken to protocol. 9. Sites may not change CBs in the 4 month audit window. 10. Clarification of the definition of 'Initial audit'.

Contents

1. Clarification on 'food defence' and 'food fraud' in the Global Standard Packaging Materials, Issue 6.

1.1 Introduction

'Food defence' and 'food fraud are phrases used by the Global Food Safety Initiative (GFSI) benchmarking document since Issue 7, in relation to packaging materials and the role they play in maintaining product integrity throughout the supply chain.

This document seeks to discuss the meaning of 'food defence' and 'food fraud' and their implications and likely manifestations within packaging material manufacturers. The aim is to make it clear that packaging manufacturers should have a plan in each case to manage any identified risks and maintain product integrity throughout the supply chain.

Some packaging materials will not come into direct contact with the food, hygiene sensitive products or the integrity of the raw materials. However, it is vital the information about the packaging material is reviewed before use to ensure product safety and legality further down the supply chain.

1.2 Food Defence

Definition used in the Global Standard Food Safety

"Procedures adopted to assure the safety of raw materials and products from malicious contamination or theft."

Definition used in GFSI benchmarking

"The process to ensure the security of food, food ingredients, feed or food packaging from all forms of intentional malicious attack (including ideologically motivated attack) leading to contamination or unsafe product."

Application in the packaging industry

A risk assessment approach should be used by the packaging manufacturer to establish if there is potential for any of the below. This risk assessment may require the site to look beyond their own process, to their suppliers, and could potentially result in risk assessments around suppliers' suppliers.

Ultimately, the aim is to identify potential hazards and take steps to mitigate the risk. Sites might choose to include this as part of their Hazard and Risk Management System, in line with section 2.2 of the Standard, or conduct the activity separately. Control measures are not specified here, but the site should determine what is appropriate, and when. Longer supply chains, where raw materials are shipped in from other countries, for example, might exacerbate the potential for the hazards to occur, either intentionally or not, so measures should be mindful of this.

Potential hazards include:

- Contamination of intermediate or finished packaging materials through malicious intervention, i.e. placing of contaminants at the packaging manufacturer.
- Contamination of raw materials through malicious intervention, i.e. contamination of raw materials prior to the raw materials arriving on site.

Clauses of particular interest in Issue 6.

- 2.2 – Hazard analysis and risk assessment
- 3.1 – Product safety and quality management system
- 4.4 – Site security
- 6.1 – Training and competence

Therefore, the site's assessment of their security arrangements shall result in a plan to manage the hazards identified. This will include:

- The identification of processes and procedures to reduce the risk
- Implementation of the identified processes or procedures
- Monitoring where applicable the processes to ensure these are effectively applied
- Corrective and preventative actions where monitoring indicates failure
- Annual review of the arrangements (plan) for effectiveness.

1.3 Food Fraud

Definition used in the Global Standard Food Safety

"Fraudulent and intentional substitution, dilution or addition to a product or raw material, or misrepresentation of the product or material, for the purpose of financial gain, by increasing the apparent value of the product or reducing the cost of its production."

Definition used in GFSI benchmarking

"A collective term encompassing the deliberate and intentional substitution, addition, tampering or misrepresentation of food, food ingredients, feed, or food packaging, labelling, product information or false or misleading statements made about a product for economic gain that could impact consumer health."

Application in the packaging industry

Again, a risk assessment approach will help sites in determining if there is opportunity in their supply chain, raw materials management and processes for fraudulent activity to take place.

Potential sources of fraud for the packaging manufacturer include:

- Fraudulent raw materials, e.g. non-FSC board/pulp sources in place of FSC board.
- Downgrading or substituted product, e.g. selling recycled board as virgin.
- Packaging which has been bought by non-genuine people, e.g. buyer purporting to be from a brand owner.

The potential hazards affecting brand owners that packaging manufacturers can help to mitigate include:

- Genuine packaging which is misappropriated for fraudulent products, where excess printed packaging has been illegally obtained and is essentially indistinguishable from genuine products.
- Fraudulent packaging which has been printed with genuine branding/artworks, where the brand logo has been obtained and is being used on fraudulent products.
- Misrepresentation of the retailed product, i.e. fraudulent packaging and a fraudulent product retailed as a genuine product.

Two of these three points can be affected by the packaging manufacturer. For example, if the management of excess printed packaging materials is effective, ensuring that it is not possible for these types of materials to be used, then the risk of this scenario is reduced.

Similarly, where the site demonstrates sufficient control of logos and branding that has been given to them in order to print or decorate packaging materials, the likelihood that these can be obtained and mis-used by unauthorised parties is reduced.

Requirements in 4.10 – Waste and waste disposal, 5.2 – Graphic design and artwork control, 5.3 – Packaging print control, and 5.7 – Control of non-conforming product are all relevant as they contain requirements outlining the site's responsibilities with regards to the management of digital data, such as logos, control of printing plates and other decoration media, and management of excess materials and non-conforming (but useable) materials. This is not just with regards to physical items; digital security is crucial so sites should be investigating their systems vulnerabilities.

When auditing these clauses, BRCGS expectation is that the assessment shall result in a plan to manage the identified hazards associated with raw materials or groups of materials. This will include:

- The identification of the measures to reduce the risk
- Implementation of the identified processes to manage the risk
- Testing and assurance processes (monitoring) where applicable is effectively applied
- Corrective and preventative actions where testing or checks indicates failure
- Annual review of the assessment (plan) for effectiveness.

These changes should be included as part of audits from the date of issue of this document.

2. Disposable food contact packaging/consumer items

2.1 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 Global Standard Packaging and Packaging Materials. The same products are also manufactured by sites certificated to the Global Standard for Consumer Products. 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 Global Standard Packaging Materials, 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 Global Standard Consumer Products 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 the Global Standard Consumer Products 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.

2.2 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.

2.3 Product/Standard selection table

Figure 1 shows a table of the 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.

Figure 1: Product / Standard selection table

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

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

Plates		
Single use plastic/paper plates	Either Packaging Materials or Consumer Products PCH*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector **and/or** where the factory is predominantly producing packaging materials (at least 70%). Global Standard Consumer Products is acceptable where the final product is purchased largely for domestic use by a consumer.
Re-useable plastic, ceramic, metal plates	Consumer Products	General Merchandise Higher level. These items are washed before use.
Tablecloths/Tray Liners		
Paper/plastic Tablecloths/tray liners	Either Packaging Materials or Consumer Products*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector **and/or** where the factory is predominantly producing packaging materials (at least 70%). Global Standard Consumer Products is acceptable where the final product is purchased largely for domestic use by a consumer.
Textile tablecloths	Consumer Products	General Merchandise
Utensils, cutlery		
Single use Plastic/wooden/bamboo cutlery	Either Packaging Materials or Consumer Products*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector **and/or** where the factory is predominantly producing packaging materials (at least 70%). Global Standard Consumer products 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.

Personal Protective Equipment, PPE		
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*	

* Global Standard Consumer Products (Issue 4, Personal Care and Household).

3. Additional requirement for functional packaging claims

3.1 Background

The Global Standard Packaging Materials is a GFSI benchmarked standard, and this adds to the value of certification for sites that have achieved certification. The GFSI benchmarking requirements have been updated to include a requirement for standards where packaging used to impart or provide a functional effect on the safety of the product shall be effective.

In addition to the requirements of clause 3.4.3, the following supplementary requirement in italics shall apply and be included within all audits commencing from 1 July 2021.

3.4.1 Specifications shall be suitably detailed, accurate and compliant with relevant product safety and legislative requirements. They may be in the form of a printed or electronic document, or part of an online specification system.

Where functional packaging for food or other hygiene-sensitive products is produced, the specification shall contain reference to documented evidence to demonstrate effectiveness or proof of effect claimed by the packaging material including control and extension of shelf life, freshness, and temperature monitoring.

3.2 Interpretation

Functional packaging systems can be used with food, beverage and other hygiene-sensitive products such as pharmaceuticals and cosmetics. Functional packaging is any kind of packaging that has functions beyond passive containment of the product and offer extra, valuable benefits to the consumer. They help, for example, to control and extend shelf life, monitor freshness, display information on safety, provide tamper evidence, maintain quality and improve convenience. For example, packaging with low oxygen transmission rate will let in less oxygen into the closed package because of the nature of the polymer barrier itself. Thermochromic ink technology enables a broad range of labels to be produced that are designed to change colour or disappear if the product is exposed to a change in temperature. A specific trigger temperature will make the print features disappear or appear when they have been exposed to heat, and therefore warn the user that the product may have exceeded safe temperatures, or it has been corrupted. Non-refillable pouring/dispensing packaging closures are widely used for liquids such as spirits to protect the product from adulteration and counterfeit activity, thereby providing customer confidence to select authentic products. Smart labels with radiofrequency (RFID) identification chips are used to track and trace or record temperature history of shipments; quick response (QR) codes and the fast developing near field communication (NFC) tags can also hold a lot more information than would fit on to an ordinary label.

Where such claims are made for functional packaging produced for product safety assurance or improvements, the proof of effectiveness or traceable references to it shall be documented in the packaging specification(s). This information shall be made available to the auditor for review as evidence upon request.

The information shall include as a minimum:

- the intended use of the packaging materials
- The functional effect(s)
- The types of tests conducted and results
- Where appropriate, the name of the laboratory and any accreditation details
- Confirm compliance with the agreed customer(s) specification(s)

Where appropriate to the specified functional effect, the documented evidence shall reference and include the following tests as appropriate to the packaging.

- Chemical, sensory and migration
- Head space analysis
- Oxygen transmission rates (OTR) and water transmission rates (MVTR)
- Shelf-life trials
- Microbial leakage
- RFID performance
- Pour rates and dispensing/dosing testing

Producers of the finished products including end packers are responsible for providing documented evidence or traceable references to claims substantiation for functional packaging.

This information shall be made available to the auditor for review as evidence upon request.

4. Allergen Management Control

4.1 Introduction

An allergen is a known component which causes physiological reactions due to an immunological response (Global Standard Packaging Materials, Issue 6) .

Food laws in various countries identify and publish their own food allergens that need to be declared to food businesses in the supply chain and to the consumer through appropriate and accurate labelling. Equally non- food allergens are expected to be managed in a similar way [1;2;3;4;5].

There are a number of materials used in packaging materials which are derived from allergens. Some types of paperboard and plastic packaging that may contain soy-derived glues or resins, wheat-derived starches or casein-derived coatings, additives, and certain types of rubber latex are examples. Although the risk is quite low, latex is used in many types of food packaging materials, including rubber bands, meat netting, stickers found on some fruit and vegetables and the adhesive used for cold sealing of confectionary.

In food and non-food applications certain packaging materials may be encapsulated with fragrances (scents) for masking or marketing purposes. Fragrances delivered in various plastic parts are being used in stores to create a mood and/or bring products to the consumers' attention, particularly in food and beverage packaging. Masking unpleasant odours in applications such as dust bin bags or household chemical containers is also an area where fragrances are utilised. For example, in PVC, fragrances are used to cover the smell of sulphur-based stabilisers. Some fragrances may contain fragrance allergenic or sensitising ingredients [1;2;3:4;5].

4.2 Background

The Global Standard Packaging Materials is a GFSI benchmarked Standard, and this adds to the value of certification for sites that have achieved certification and assurance of compliance to their customers. The GFSI benchmarking requirements have been updated to include a requirement for an allergen management plan to be established, implemented, and maintained. This shall include a risk assessment of allergen cross contamination and implemented controls to reduce or eliminate that risk.

The following supplementary requirements shall apply and be included within all audits commencing from 1 July 2021.

Supplementary Requirements

4.9.3.3 Where allergens have been identified as part of the hazard analysis and risk assessment the routes for contamination from incoming goods to storage and dispatch shall be identified. Documented policies and procedures for handling such materials to avoid cross contamination (cross-contact) shall be established.

4.9.3.4 The site shall establish, implement, and maintain a plan for the management of allergens to minimise or eliminate the risk of contamination to and/or from the packaging and meet legal requirements for labelling in the country of sale. The plan shall be reviewed based on risk.

4.3 Interpretation

The Standard adequately addresses the risk of items containing potential allergens such as food or non-food items brought in or made on site. Food and beverage or cigarettes brought on to site by staff, visitors and contractors shall not be taken into production areas or consumed in the locker and changing rooms.

An Allergen Management Plan is a documented system that serves to identify, control, educate and communicate the risk and presence of allergens on the site, from raw materials through to finished products. The allergens are limited to those identified by law in the country or region of sale, examples are given in the reference section below [1;2;3;4;5]. It defines the policies and procedures for managing allergens within the site and at a minimum, the plan will include:

- HARA- A detailed assessment as part of the documented hazard analysis and risk assessment

The Cleaning Process

Any areas or equipment that may be cross contaminated with allergens may require specific cleaning procedures which is adequately covered by the Standard. As for routine cleaning procedures, the specific cleaning procedures shall be validated, verified and records of checks documented to ensure the risk of allergen contamination is mitigated.

Segregation procedures

Any materials, components and /or articles identified as containing allergens should be stored and handled in such a way as to minimise the potential to contaminate other materials, components and /or articles that do not contain them. Measures to consider include physical segregation; the use of separate protective clothing and equipment when handing allergenic material; segregation; waste handling and spillage controls.

Product labelling

The presence of allergens needs to be communicated to customers and may be subject to legislative requirements in the country of sale. The accuracy of labels and communication is paramount. Additionally, where a site is responsible for the manufacture of printed materials such as labels, it will require processes to ensure the accuracy and legality of the material and is covered by the Standard.

The allergen management plan shall be reviewed as necessary including when:

- There is a change to raw materials or suppliers
- There is a change in the manufacturing process
- There has been an introduction of new machinery/equipment
- There is a change to cleaning practices and procedures

If the site determines that packaging materials, components and/or articles for food contact or hygiene sensitive product contact may contain an allergen identified in law, it has the responsibility to disclose the presence of the allergen to customers, who will make the final decision on final product labelling for consumers.

4.5 References

1. www.food.gov.uk/business-guidance/allergen-guidance-for-food-businesses.

2. www.fda.gov/food/food-labeling-nutrition/food-allergies.

3. ec.europa.eu/jrc/en/publication/articles-journals/allergens-foods.

4. www.fda.gov/cosmetics/cosmetic-ingredients/allergens-cosmetics.

5. Regulation (EC) No 1223/2009 of the European Parliament and of the Council of 30 November 2009 on cosmetic products.

5. Corrective Action timelines - correction

The statement under protocol 2.3.2 is **incorrect** and does not match the text in other parts of the Standard:

For initial audits only, if there is no temporary solution or if there is a justifiable delay to implementing a permanent solution (e.g. lead time on capital expenditure) for a major non-conformity, then provided that an acceptable statement of explanation is received by the certification body within 28 calendar days, the company may remain in the certification programme for up to 90 calendar days. It will, however, remain uncertificated and will only be certificated following verification of the corrective action being implemented.

This shall be replaced by the correction:

For initial audits only, up to 90 calendar days are allowed to provide objective evidence of correction of any non-conformities identified at the audit. The site will, however, remain uncertificated and will only be certificated following verification of the corrective action being implemented.

6. Changes to the unannounced audit protocol for recertification audit window and number of non-audit days:

To ensure that all BRCGS Standards maintain comparable audit protocol for unannounced audits, BRCGS have made 2 changes to the unannounced audit protocol for Global Standard Packaging Materials Issue 6. These changes can be summarised as:

- a reduction of the unannounced audit window from 9 months to 4 months.
- a reduction in the number of non-audit days which a company can nominate from 15 days to 10 days.

These changes come into effect on 1 February 2023 (i.e. apply to all unannounced packaging materials audits starting on or after 1 February 2023).

Therefore, from 1st February 2023 the following text replaces sections 3.1.4 and 3.8.1 of the audit protocol currently in the Standard:

Section 3.1.4 of the Protocol- 'Nominating non-audit days' has been updated:

The unannounced audit programme allows sites the opportunity to nominate 10 days when the site is not available for an audit.

The dates must be provided at least 4 weeks in advance and the reason must be provided (e.g. a planned customer visit). The certification body may challenge the reason where this does not appear appropriate and at its discretion accept these nominated dates.

Days when the factory is not operating, such as weekends, public holidays or planned shutdowns for site holidays or maintenance, are not included in the 10 days. Any such non-production days shall be notified to the certification body when opting into the unannounced scheme.

Certification bodies are expected to operate discretion in the case of emergencies.

It is a condition of electing to join the unannounced scheme that the auditor shall be granted access to the site for the audit on arrival. If access is denied the site will be liable for the auditor's costs and will revert to the announced audit scheme. At the discretion of the certification body, the existing certificate may also be suspended or withdrawn.

Sites on a 6-month audit schedule (e.g. sites certificated to the Standard with grades C or D) may nominate a maximum of 5 days.

Section 3.8.1 of the Protocol- 'Scheduling re-audit dates' has been updated:

The site can choose whether to:

• remain within the unannounced programme

• revert to the announced audit programme.

If the site wishes to remain in the unannounced programme, the next audit will be unannounced. The audit may occur at any stage within the last 4 months of the audit cycle

of the certification cycle, including the 28 calendar days before the audit due date. The audit will be unannounced, and the date of the audit shall not be notified to the site in advance.

It is the responsibility of the certification body to ensure that the audit is undertaken within the certification window.

If the site wishes to withdraw from the unannounced audit programme, the next audit will be scheduled to occur within the 28 calendar days up to and including the anniversary of the last audit date; this ensures that the maximum time between audits is not more than a year.

In some situations, the certification body may have already scheduled the unannounced audit with a 9 month timescale (for example, to ensure time for planning of visas). To accommodate this, BRCGS will allow certification bodies to complete audits outside the 4 month window but within the 9 month window until 1st July 2023. After this date, all unannounced audits will be carried out within the 4 month window as described in this position statement.

Effective date: 1 April 2023

7. Changing Certification Body for a Re-audit

In addition to the situations described in section 2.8.3 of the audit protocol, an early re-audit may occasionally be requested by a site – usually shortly after the previous audit or following a failure to get certificated. This often occurs because the site wants to improve its audit grade.

Sites have the ability to request a re-audit however this must be completed by the Certification Body who issued the current certificate.

In exceptional circumstances, a site may be permitted to change Certification Bodies for the re-audit when agreed in advance by BRCGS.

Where a change in Certification Body has not been sanctioned, the re-audit will be null and void and will not be accepted onto the BRCGS Directory.

Justification shall be provided in writing to the Certification Body who shall submit it to BRCGS for consideration through the formal concession process.

This requirement applies only when an early re-audit has been requested; it does not change the process for re-audits completed to the normal 6- or 12-month schedule.

Effective: 1 April 2023

8. Change to clause 1.1.7:

Where the site is certificated to the Standard, it shall ensure that announced recertification audits occur on or before the audit due date indicated on the certificate. **It is the site's responsibility to ensure that all requirements are in place to ensure the unannounced audit can be undertaken in accordance with the protocol.**

Certification bodies will discuss audit options with sites and notify them which year an unannounced audit will take place (the actual date of the unannounced audit will not be communicated to the site). This discussion must occur within 3 months after the last audit, to ensure that the site knows if an unannounced audit will take place in the coming year.

It is the site's responsibility to ensure that all requirements are in place to ensure the unannounced audit can be undertaken in accordance with the protocol, and this includes agreeing contractual terms with the certification body in advance of the start of the 4 month window, and keeping the certification body up to date on changes that may affect this planning, such as maintenance shutdowns.

Where the site has not made adequate arrangements with the Certification Body in due time prior to the start of the 4 month audit window, the audit due date will be shifted to accommodate the 'late start' and the unannounced audit may be completed at any time in the next 4 months. Sites should acknowledge that their current certificate may therefore expire. In addition, a major non conformity shall be awarded. Certification Bodies shall inform BRCGS through the usual concession process.

Sites that have changed (or are planning to change) certification body should refer to Position statement 10 below.

Effective: 1 May 2024

9. Changing certification body

There are a number of arrangements to be made by both a site and its chosen Certification Body to ensure a BRCGS audit is undertaken to the correct protocol.

The protocol requires that within 3 months of the previous audit date, the site either opts into the voluntary unannounced programme or if within the announced or blended announced programme that the certification body will communicate to the site whether the next audit will be announced or unannounced.

A site may choose to change to a different certification body from its current certifying body, however, changes will **not be permitted in the last 4 months of the audit window, whether an unannounced audit is scheduled or not, unless agreed in writing with BRCGS through the Certification Body concession process.**

Effective: 1 May 2024

10. Update to Appendix 6 Glossary of terms

Definition of 'initial' audit

Currently, the BRCGS Packaging Materials Standard Issue 6 defines an Initial audit as "The BRCGS audit at a company/site which is not in possession of a valid BRCGS certificate. This may be the first audit at a site or a subsequent audit of a site whose certification has lapsed."

This definition has been updated to-
Initial audit- "The first BRCGS audit at a specific site address or audit carried out at a site where the previous certificate has lapsed for more than 24 months."

It should be noted that this change impacts the requirement for an unannounced audit to be undertaken at least once in every 3 years. This three year cycle will continue irrespective of a lapse in certification as specified for 24 months.

Effective: 1 January 2024