

P708: Packaging Materials, Issue 7

Position statements

Document scope

Where clarification of interpretation of a requirement of the Global Standard Packaging Materials, Issue 7 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	Date	Description
1	12/05/2026	First version. Effective from 10 August 2026 Position Statement 1 - Updated clauses to align with the GFSI Benchmarking Requirements v 2024.
1.1	06/10/2026	Update for rebrand

Position statement 1

The amendment to clauses 4.4.1 and 4.8.2 (in bold below) is a result of the assessment of the Standard against the GFSI Benchmarking Requirements v. 2024.

Clause 4.4 Site security and product defence

Clause	Requirements
4.4.1	The company shall undertake a documented threat assessment of the security arrangements and potential risks to the products from any deliberate attempt to inflict contamination or damage. This threat assessment shall include both internal and external threats. The output from this assessment shall be a product defence plan, specifying systems and procedures to be implemented to mitigate identified risks. The plan shall be monitored to ensure it is effectively implemented. Corrective and preventive actions shall be implemented where monitoring indicates failure. Areas shall be assessed according to risk. Areas where exposed food or hygiene sensitive contact surfaces are present shall be defined, clearly identified, monitored and controlled. This plan shall be kept under review to reflect changing circumstances and industry feedback. It shall be formally reviewed at least annually and whenever: – a new risk emerges (e.g. a new threat is publicised or identified) – an incident occurs where there is an identified failure in product security or product defence. Where applicable, the product defence plan shall meet the legal requirements in the country of sale or intended use. Where personnel are engaged in threat assessments and product defence plans, the individual or team responsible shall be appropriately trained (clause 6.1).

INTERPRETATION

Addition of clarity on the need for appropriate training of staff involved in threat assessment and product defence plans – confirming the requirements of clause 6.1.

Clause 4.8 Housekeeping and cleaning

Clause	Requirements
4.8.2	Cleaning and where appropriate disinfection procedures shall be in place implemented and maintained for buildings, equipment and vehicles. Cleaning schedules and procedures shall include the following information: – responsibility for cleaning – item/area to be cleaned – frequency of cleaning – method of cleaning – cleaning materials to be used – cleaning record and responsibility for verification.

		The frequency and methods of cleaning shall be based on risk. The procedures shall be implemented to ensure that appropriate standards of cleaning are achieved, validated and verified based on risks of the intended use of the finished product or activity. Cleaning activities shall not pose a risk to product safety.
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INTERPRETATION

Addition of the term disinfection to be considered, where required for cleaning activities.

The addition of the requirement for validation and verification of cleaning procedures, based on consideration of risk of the intended use of the product or activities.

Appendices

Appendix 8 Glossary

The glossary has been updated to include a definition for disinfection that was not previously included.

Definition:

Disinfection Disinfection is the process or act of destroying pathogenic micro-organisms; it removed most organisms present on the surfaces.

Effective date: 10 August 2026