BRC/IoP Global Standard

Food Packaging and Other Packaging Materials

A guide to the revisions contained in Issue 2 of the Standard

The purpose of this guide is to help companies obtain a quick overview of the changes made from Issue 1 to Issue 2 of the BRC/IoP Packaging Standard. The guide does not go into detail on every clause and should be read in conjunction with Issue 2 of the Standard.

We do not warrant the accuracy or completeness of the information provided in this guide. And we cannot be held liable for its use.

Prepared by - SaferPak Ltd.

Foreword

Issue 2 of the BRC/IoP Global Standard Food Packaging and Other Packaging Materials was published on 31 August 2004. Originally published October 2001, the Standard is the benchmark for best practice across the packaging industry for the packaging of food and other non-food products. The revised Standard has arisen out of extensive consultation between the British Retail Consortium (BRC), the Institute of Packaging (IoP), packaging suppliers, food manufacturers, and third party certification bodies.

The Standard may be purchased at the following link:

http://www.tso.co.uk/bookshop/bookstore.asp?AF=A10096&FO=1159966&Action=Book&From=SearchResults&ProductID=0117022225

Revisions:

Title:

Formerly:

The BRC/IoP Technical Standard and Protocol for Companies Manufacturing and Supplying Food Packaging Materials for Retailer Branded products.

Now:

The BRC/IoP Global Standard – Food Packaging and Other Packaging Material.

Introduction:

The introduction is the preamble to the standard and contains some useful background information. The introduction has been extensively revised with some completely new sections added.

- Background
  Some text amendments.
- The British Retail Consortium
  Some text amendments.
- The Institute of Packaging
  Some text amendments.
- BRC/IoP Relationship
  Some text amendments.

- Legislative Requirements – NEW!
  Discusses UK 'due diligence' and the 'due diligence defence' as well as outlining the important role the Standard and all parties associated with it have in helping to fulfil this legal requirement.

- Benefits of the BRC/IoP Packaging Standard
  No changes.

- Principles of BRC/IoP Packaging Standard – NEW!
  Sets out the main objectives of the standard.

- The Management of Standards – NEW!
  Diagram showing the BRC Technical Committee structure which provides the framework for the strategic direction and effective management of BRC Technical Standards.

- The BRC Standards Governance and Strategy Committee – NEW!
  Outlines the members and functions of the Governance and Strategy Committee.

- The Standard Technical Advisory Committees - NEW!
  Outlines the members and functions of the Technical Advisory Committee.

  NOTE:
  "The BRC and IoP will put into place performance measurement systems to monitor continued compliance by companies, certification bodies, and accreditation bodies."

- Accreditation - NEW!
  Explanation of the Accreditation process including the benefits.

- Certification - NEW!
  Overview of the requirements for Accredited Certification Bodies. Includes a diagram explaining the relationship (and differences) between accreditation and certification.

- The Relationship between BRC, IoP, Accreditation Bodies, and Certification Bodies - NEW!
  Text and diagram showing how the BRC interacts and communicates with both certification bodies and accreditation bodies.

- The BRC/IoP Packaging Standard Requirements
  Title change.

- The Format of the BRC/IoP Packaging Standard
  Slight wording changes. Also 'Recommendations on Good Practice' are now referred to as 'Best Practice Guidelines'.

- Risk Category Determination
  Moved from the back of the Standard to the introduction section. No changes to the decision tree logic. Addition of BRC contact information if clear definition of 'product rating' or 'risk category' cannot be defined.

- The Relationship of the BRC/IoP Standard with Other Standards
  No changes.

- Liability
  No changes.

1. Scope:

The scope has been completely rewritten, clarified, and significantly extended to include the manufacture and conversion of packaging for products other than food. The various types of 'consumer disposable goods' covered has also been extended. The scope now contains a 'statement of intent'.

2. Organisation:

- 'Suitably competent' rather than 'suitably qualified' terminology now used for (designated manager, deputy, in house personnel and third party e.g. consultant).

- Processes relating to customers' needs and expectations and fulfilment of these must now be considered.

- Minimum frequency for management review now set at 12 months (Best Practice).

3. Hazard and Risk Management System

- Changes to the introductory wording and statement of intent.

- In addition to microbiological, foreign objects chemicals and defects critical to consumer safety the hazard analysis must now consider product integrity and legality.

- Now required to identify the steps, which are critical to the process (critical process steps).

4. Technical Management System

Section 4 has been split into 13 sub sections instead of 11. 4.2 Quality Manual and 4.3 Record Keeping are now standalone sub sections.

4.1 Technical Management Policy

- No change.

4.2 Quality Manual

- New sub section, new statement of intent, but no additional requirements.

4.3 Record Keeping

- New sub section, new statement of intent.
- The list detailing the minimum records required was previously in the 'Recommendations on Good Practice'. The list has been extended and moved to the requirements for Categories A & B.

4.4 Documentation Control

- Amended statement of intent, but no additional requirements.
- Must define the documentation and records that are required to be maintained in the quality manual. The period of retention must relate to the end use of the packaging.

4.5 Specifications

- Amended / extended statement of intent, but no additional requirements.

4.6 Management of Incidents and Product Recalls

- The company should use the principles laid down within the BRC Product Recall Guidelines document to establish the product recall procedures (Best Practice).

4.7 Traceability

- Amended / extended statement of intent.
- Must ensure suppliers have appropriate traceability systems in place.
- System to ensure customer can identify a product required (was previously a recommendation on good practice)
- Annual documented test of the traceability system, minimum frequency set at 12 months (Best Practice).

4.8 Process Control

- Slight amendment to statement of intent.
- Incoming goods subject to integrity checks (moved from 6.4 – 6.4.6).
- Documented acceptance procedures (moved from 6.4 – 6.4.7).
- Acceptance procedures on all materials entering building (moved from 6.4 – Best Practice).
- Non-conforming / returned product subject to inspection and positive release (moved from 6.4 – 6.4.8).

4.9 Internal Audits

- Slight amendment to the statement of intent.
- Non-conformance notification and appropriate and timely corrective action now required (was previously a recommendation on good practice).
- Management review of audits and corrective actions now required (was previously a recommendation on good practice).

4.10 Complaint Procedure

- No changes.

4.11 Supplier Monitoring

- Various options presented on how to verify suppliers, allows self-assessment questionnaire (Best Practice).

4.12 Subcontracting of Production

- A ‘competent person’ can now undertake assessment of subcontractors.

4.13 Product Analysis

- Laboratories not accredited to a European Standard should have a nationally recognised status removed (was previously a recommendation on good practice).

5. Factory Standards

5.1 Perimeter and Grounds

- Cat B that allow outside eating must now control waste appropriately.
- Clear area required around perimeter of building (Best Practice).

5.2 Layout and Product Flow

- No Changes.

5.3 Building Fabric

- Clauses 5.3.4 and the Recommendation on Good Practice regarding ‘an adequate internal perimeter gap’ moved to 5.5 Housekeeping and Cleaning.
- 5.3.5 moved to 5.5 Housekeeping and Cleaning.
- Clauses 5.3.10 and the Recommendation on Good Practice regarding ‘roof vents’ moved to 6.3 Pest Control.
- 5.3.11 moved to 6.3 Pest Control.

5.4 Maintenance of Equipment

- Clause 5.4.2 and the Recommendation on Good Practice regarding ‘cleaning schedules’ moved to 5.5 Housekeeping and Cleaning.
- New requirements for Category A regarding protection of lights where appropriate.
- Clarification on requirements for protection of all lights for Category B. (originally in 6. Contamination Control)

5.5 House keeping and Cleaning

- Additions as discussed earlier in 5.3 and 5.4.
- Cleaning schedules shall cover all areas of the site with particular reference to production and storage areas.
- Cleaning chemicals should be ‘fit for purpose’ and used in accordance with manufacturers instructions.

5.6 Waste and Waste Disposal

- Clause regarding ‘Putrescible Waste’ reworded and moved to 7.4.
- New requirement - where appropriate waste disposal contractor should be licensed.

6. Contamination Control

6.1 Foreign Body Control

- Sub section reorganised to be more logical and clear.
- New requirements for category A and B on exclusion of unnecessary glass and brittle plastics.
- New requirements to include in the policy and documented controls ‘all materials used in the construction, fixture, and fittings of the production area which could be confused with packaging material’.
- New requirements for category A on quarantine, segregation, and disposal of contaminated product.
- New requirements for category A on incident reporting.

6.2 Chemical and Biological Control

- No changes.

6.3 Pest Control

- Additions as discussed earlier in 5.3.

6.4 Transport, Storage, and Distribution

- Clauses 6.4.6, 6.4.7, and 6.4.8 moved to Process Control (see above).
- Added the word “All” to 6.4.9 vehicle pre load check.

7. Personnel

7.1 Access and Movement of Personnel

- Removed information regarding notices and health questionnaires from Best Practice.
- Added Hygiene awareness for contractors and visitors originally in 7.8 Hygiene Training.

7.2 Locker Rooms

- Clarification on which personnel are required to be provided with lockers.
- Removed all references to storage of food products in locker rooms (7.2.3, 7.2.4 old standard)
- Moved Recommendation on Good Practice regarding control of food - now a requirement see 7.4 below.

7.3 Toilets and Hand Washing Facilities

- Wording change to 7.7.3 (removed ‘likely’).
- Added ‘where appropriate’ to gloves best practice.

7.4 Facilities for Eating, Drinking and the use of Tobacco Products

- Clause regarding ‘Putrescible Waste’ reworded and moved here from 5.6 old standard.
- New requirement for category A & B on control of food (previously Recommendation on Good Practice 7.2 Old Standard).

7.5 Personal Health

- No changes.

7.6 Jewellery and Personal Items

- Clarification on the types of jewellery that can and cannot be worn.
- Possible exclusions for ethnic, medical, or religious reasons.
- New requirement Category A & B Company policy required.
- New requirement Category A & B control of personal medicines.

7.7 Protective Clothing

- Category B now required to have a system for monitoring the effectiveness of the laundering process.

7.8 Training – Raw-materials Handling, Preparation, Processing, Packing and Storage

- Title change for this section originally “Hygiene Training”
- Change to statement of intent.
- Extended requirements for training (not just hygiene training) before commencing work and supervision whilst working.
- Removed the time limit of one month for further in-depth training.
- No longer specifies ‘Formal Hygiene Certification from an Appropriate Body’. Now simply states ‘Reputable Training Provider’ in Best Practice.
- Must also consider product risk for determining refresher training (Best Practice).
- Moved Hygiene awareness for contractors and visitors to 7.1 Access and Movement of Personnel.

8. The Evaluation Protocol

The Evaluation Protocol provides the specific requirements for organisations involved with evaluation against the BRC/IoP Packaging Standard and a reference for companies being evaluated. It has been completely revised and extended for issue 2.

Risk Category Determination moved from the back to the introduction section.

8.1 Purpose of the Protocol

- Revised title (formerly introduction). Removed duplicated information regarding Accreditation of Certification Bodies.

8.2 Process of Certification – New!

- Overview of the process of certification and includes a process flow diagram summarising the process.

8.3 Company / Certification Body Contractual Arrangements

- Revised title (formerly Packaging Company / Certification Body Contractual Arrangements).

8.4 Certification Body Selection

- Revised text.

8.5 Company / Retailer Contractual Arrangements

- Revised title (formerly Packaging Company / Retailer Contractual Arrangements).
- Revised text.

8.6 Preparation for an Evaluation Visit

- Revised text.

8.7 Duration of Evaluation Visit – New!

- Outlines the typical 'man hours' expected for an evaluation and includes a list of factors that may lengthen or shorten the duration of the evaluation.

8.8 Evaluation Visit Programme

- Revised title (formerly Evaluation Procedures).
- Revised / extended text.
- Moved explanation of non-conformances to 8.9.

8.9 Evaluation – Non-conformance and Corrective Action – New!

- Section now goes into much more detail on the different types of nonconformity, how they are to be managed, and how they affect certification.

8.10 Evaluation Reporting and Certification

- This section is much extended and specifies the format for the evaluation report and the certificate.

8.11 Evaluation Visit Frequency

- Revised title (formerly Evaluation Visits).
- Revised / extended text.

8.12 Documentation – New!

- Specifies the retention time for Evaluation documents (5 years).
- Clarifies ownership of certificate.

8.13 Supplementary Action

- Revised / extended text.

8.14 Complaints

- No Change.

8.15 Appeals – New!

- Outlines the appeals process.

NOTE:
The protocol appendices have been removed in Issue 2. The Protocol appendices provided information on fields of evaluation and the qualifications, training and experience required for evaluators. At one time Evaluators had to take the IoP EQIPT course and again there is no mention of this. There are some details under 'Accreditation' in the Introduction regarding competence of evaluators and in 8.10.2 of the Evaluation protocol there is now mention of 'the BRC Quality Mark' which can be included on a certificate when an evaluation has been undertaken by an evaluator trained by BRC who has been issued with a BRC Third Party Auditor Certificate.

9. Glossary of Terms

- Revised / extended.

Comments, errors, or omissions should be reported by email to info@saferpak.com, or by telephone to: 0044 (0) 161 287 9880.

General discussion, help, and advice on meeting the requirements of the Standard can be found at the SaferPak Discussion Forums:

http://www.saferpak.com/forum/index.php