

# BRCGS Global Standard for Packaging and Packaging Materials Issue 5-6

## Key Changes Pocket Transition Guide



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# BRCGS Global Standard for Packaging and Packaging Materials Issue 5-6 Pocket Transition Guide

This handy guide is your quick reference to some of the key changes between the BRCGS Global Standard for Packaging and Packaging Materials Issue 5 and 6, and also contains helpful definitions of terms.

If you're already familiar with issue 5 many of these terms won't be new. This guide can also be used to support your supply chain if you're a user of packaging materials.

If you're looking for further support, here's how you can get in touch:

Email: [\*\*foodsafety@bsigroup.com\*\*](mailto:foodsafety@bsigroup.com)

Tel: **+44 345 080 9000**

Web: [\*\*bsigroup.com/packaging-uk\*\*](https://www.bsigroup.com/packaging-uk)



Packaging  
and Packaging  
Materials

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## BRCGS Global Standard for Packaging and Packaging Materials

BRCGS is a privately owned programme owner, formerly part of the British Retail Consortium. The BRCGS is the leading GFSI-benchmarked scheme owner for food safety and packaging and their standards are regarded as a benchmark for compliance to good practice in the food industry. The BRCGS standard is applicable to sites that manufacture any type of packaging for any application, for food and non-food, and for primary, secondary and tertiary levels.

The BRCGS Global Standard for Packaging and Packaging Materials is a leading GFSI certification scheme in the UK and across the world. Many UK retailers mandate certification to the standard as a pre-requisite for supply.



**!** *This guide is for information purposes only and is based on the final draft of the BRCGS Global Standard for Packaging and Packaging Materials Issue 6.*

## Key food industry definitions

Some packaging industry terms can be confusing. Here are a few common acronyms and terms with their definitions for your reference.

### **GFSI recognized**

Global Food Safety Initiative Recognized. A food safety certification programme is 'recognized' by GFSI when it meets the internationally recognized food safety requirements developed by a multi-stakeholder group convened by the Global Food Safety Initiative. GFSI is not a certification programme in itself, nor does it carry out any accreditation or certification activities.

### **FSMA**

Food Safety Modernization Act. The US Food and Drug Administration's (FDA) Food Safety Modernization Act (FSMA) is the most exhaustive reform of food safety laws in the US in more than 70 years. The act was signed into law by President Obama on 4 January 2011. FSMA takes a preventative approach to food safety and has the primary aim of ensuring that the US food supply is safe.

## **HACCP**

Hazard analysis and critical control points

## **HARA**

Hazard and risk analysis

## **HARM**

Hazard and risk management

## **TACCP**

Threat analysis and critical control points

## **VACCP**

Vulnerability analysis and critical control points

## **GMP**

Good manufacturing practices

## **QMS**

Quality management system

## **QCPs**

Quality control point(s)

## **CCPs**

Critical control point(s)



## Accredited

Certification bodies are accredited to perform audits

## Certified

To be awarded certification, a company undergoes a physical onsite assessment/audit.

- **First-party audit**

Where a business conducts their own assessment of their work, usually referred to as an internal audit

- **Second-party audit**

An audit which is conducted by or on behalf of a organization/specifier against that organization's own specifications, requirements or standard

- **Third-party audit**

An audit which is conducted by an independent impartial body to a specific standard. Certification to the **BRCGS packaging standard is achieved via third-party audits**

## Verified

Verification is usually awarded where a document-based review (DBR) is conducted, but a physical onsite assessment (audit) is not. Verification is usually regarded as less prestigious and trustworthy than certification.



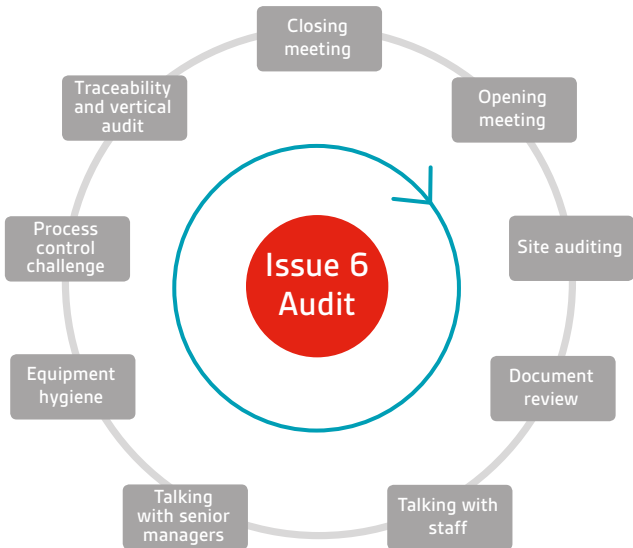
## High-level changes, issue 5 to issue 6

### quick reference overview

Section	Focus	Focus of key changes by theme
All	Standard	Removal of second hygiene category. One set of requirements applies to manufacture of any type of packaging, at any level, for any application.
1	Senior mgmt commitment and continual improvement	Strategically important elements requiring changes at senior management level: Inclusion of product safety culture, product defence and product fraud plans.
2	Hazard and risk analysis	Separation of product safety and product quality hazards in the HARA, and potential for resultant QCPS, even if the site has no CCPs.
3	Product safety and quality management	Product safety culture, product defence aligned with GFSI, cyber security, internal audit, CAPA
4	Site standards	Product safety culture, site security and product defence.
5	Product and process control	Newer and emphasized elements of production trials, validation of information transfer, line clearance and testing methodologies.
7	Requirements for traded products	Inclusion as part of the standard document rather than a separate publication. Still an optional module with focus on product safety, product defence and product security.
8	Pellet, flake and powder control	New set of requirements in an optional module focused on the handling of pre-production plastics at (could we change to for, just for better reading?) plastics converters. Not applicable for sites operating in other sectors unless they handle pre-production plastics commonly referred to 'pellets' and 'nurdles,' but also including flake and powder.

## What to expect – a typical issue 6 audit

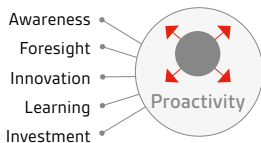
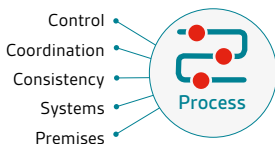
All audits differ from one to another, as each manufacturing facility is unique in its operation. However, most audits will include the steps in the diagram below.





## Food safety/organizational culture

Every organization has a culture that combines several factors (see below). Consideration of each factor may assist sites in assessing their culture and identifying which elements can be improved. During the audit, the organizational culture will be audited by reviewing the projects and plans the site has in place to support their own culture.



## Product safety and quality culture

BRCGS' packaging standard continues to put greater emphasis on management commitment to product safety culture. Issue 6 places clear obligations to develop a vertical product safety culture.



This requires senior management to create and implement a strategic plan that permits review and continual improvement, as well as encouraging employee communication and ownership from the bottom up. Best developed with the involvement of HR, procurement, IT and marketing, action plans for all sections of a site that have an impact on product safety must be defined, time-lined and measured. Senior management is also responsible for reviewing how effective the activity was following implementation.

## Product security and defence

To integrate product defence systems into factory protocols to protect the safety of raw materials and finished product from malicious actions (e.g. intentional and malicious contamination), a risk-based action plan is required to assess all stages of production during its time on site.



## A risk-based approach

Previous editions of the standard used two or three hygiene categories. Which one was used depended on the application for the packaging material being produced at the site. Food contact materials would be subject to the highest hygiene requirements. For example, transit packaging like corrugated cases would be produced under less stringent hygiene requirements due to the reduced risk of contamination from these materials to products.

Issue 6 will use just one set of requirements. Risk assessment is used more broadly to determine exactly what's required to manage physical, chemical and microbiological risks to the product. There are also some specific requirements for sites producing materials for direct contact with food or other hygiene-sensitive products.

This change reflects the greater acceptance and suitability of a risk-based approach, and that a risk-based systems approach builds product safety and quality management into a company's operations.

## Pellet, flake and powder control

This optional module is applicable only to sites that take in polymer pellet, flake and powder for conversion into packaging materials. The module was included as a direct result of retailers and the packaging industry seeking to minimize the risk of loss of these materials to the environment, which can result in contamination of our oceans and the global food chain. The module was developed with the British Plastics Federation (BPF) and is based on Operation Clean Sweep (OCS), originally developed by the US organization PLASTICS.





# Codex Alimentarius

## quick reference guide

Clause	Codex Alimentarius
<b>2.1</b> The HARA team	Step 1
<b>2.2.3</b> Describe the product	Step 2
<b>2.2.3</b> Identify intended use	Step 3
<b>2.2.4</b> Construct a process flow diagram	Step 4
<b>2.2.5</b> Verify flow diagram	Step 5
<b>2.2.6</b> List all potential hazards associated with each process step, conduct a hazard analysis and consider any measures to control identified hazards	Step 6, Principle 1
<b>2.2.9</b> Determine the critical control points (CCPs)	Step 7, Principle 2
<b>2.2.10</b> Establish critical limits for each CCP	Step 8, Principle 3
<b>2.2.11</b> Establish a monitoring system for each CCP	Step 9, Principle 4
<b>2.2.12</b> Establish a corrective action plan	Step 10, Principle 5
<b>2.2.13</b> Establish verification procedures	Step 11, Principle 6
<b>2.2.1</b> HARA documentation and record keeping	Step 12, Principle 7

**Note** that the HARA in issue 6 looks at product quality hazards as well as product safety. The over-arching aim is to avoid deviation from specification as it results in costly non-conforming products. Packaging that functions well on automated or semi-automated production lines is a crucial requirement by customers of packaging producers.

## Supplier approval

Supplier approval clauses have an extended scope in issue 6, covering materials, services, subcontracted and outsourced processes and direct suppliers.

Supplier approval based on risk analysis and defined performance criteria continues to cover materials, subcontracted processes and now includes outsourced production within this clause's (3.7.1) scope). Increased emphasis is also placed on traceability and certification in this area.



## Cybersecurity



4 in 10 businesses suffered a cybersecurity breach in 2018. For organizations in the food and hospitality sectors this number was even higher...\*

In section 3.12.3 issue 6 positions a cyber-failure or attack as being as much of a threat as fire, flood or sabotage. Any site audited against the BRCGS standard is expected to be able to effectively manage a product recall or withdrawal resulting from a cyber-attack or failure.



**Looking to mitigate your cyber risk?** For many food sector and non-food sector organizations implementing an information security management system such as ISO/IEC 27001 is essential to securing your business.

\* Source: Department for Digital, Culture, Media & Sport - Cyber Security Breaches Survey 2018.

## Sustainable production

Sustainable production in the packaging industry isn't just about which materials are used. There are plenty of ways to improve the sustainability of your manufacturing processes.

### Environmental management (ISO 14001)

ISO 14001 helps businesses of all sizes across all sectors make their day-to-day operations more sustainable. Sustainability can ultimately save money, improve brand reputation and engage employees.

#### Benefits of ISO 14001\*

##### Environmental improvements



57%  
Waste defect  
reduction



76%  
Regulatory and  
industry compliance

##### Business growth



52%  
Increasing your  
competitive edge



60%  
Inspiring trust  
in your business

## Energy management (ISO 50001)

Whether you're interested in certifying to ISO 50001 to reduce costs, comply with legislation or increase your sustainability, implementing the standard provides a systematic approach to achieving all three of these goals.

### Benefits of ISO 50001\*

#### Business improvements



“Whereas ISO 14001 is a generic standard for the environment, ISO 50001 focuses on the cost benefits of using utilities more efficiently. The business case for it is clear.”

Denise Graham, Technical Manager, **Tata Global Beverages**



\*Source: BSI Benefits survey - BSI clients were asked which benefits they obtained from ISO 50001

## Steps for a successful transition



Top tips from **Joanna Griffiths**, our packaging expert.

- 1** Attend a BSI packaging transition event or webinar, visit **<http://www.bsigroup.com/packaging-uk/>**
- 2** Read the standard, available from August 2019. Sites who already have a BRCGS Participate subscription can also access a copy of the comprehensive key changes document and the issue 6 interpretation and guide.
- 3** Once you're familiar with the standard, book onto a transition course for a deeper dive into clause-by-clause changes to make sure you haven't missed anything. This is a great opportunity to talk to other businesses transitioning and share opinions and tips.
- 4** Book your audit date far enough in advance so you have enough time to implement any changes necessary to attain the best result possible.



## Training and webinars

BSI offers a wide variety of training courses and free webinars to help the packaging industry to stay at the top of their game. Growth in the sector comes from upskilling and empowering people to perform at their best; whether that's from learning the principles of HARA to managing product safety and quality or becoming a black belt in Lean Six Sigma to drive operational efficiencies.



Combined, our tutors have over **8,000** years' training experience



We have over **600** tutors worldwide



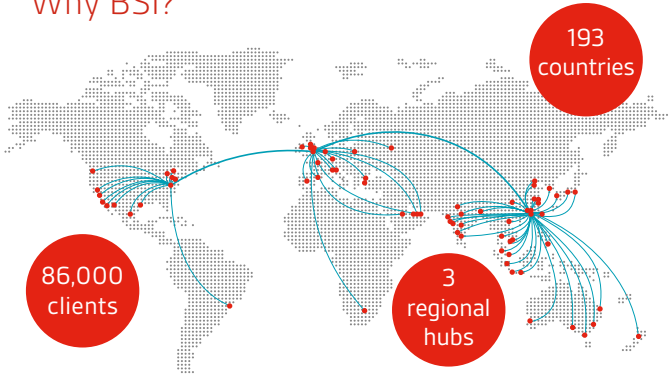
Delegates rate our tutors **8.9/10\***

### BSI training customer feedback

“Excellent course, all of my objectives were fulfilled. It has filled the gaps in my knowledge for implementing a QMS.” **Denise Hoarty, Unilever**

\* Based on 2017 BSI delegate survey response data

## Why BSI?



- We've originated some of the world's most adopted standards including ISO 9001 and ISO 14001
- We have over **100 years'** experience spanning almost every sector
- Global specialization focusing on standards, training, certification and business improvement software
- Our industry-expert assessors are constantly trained on new standards and processes
- Combined, our tutors have **250 years'** of experience working with management systems





We believe the world should be supplied quality food that is safe, sustainable and socially responsible.

We're a leading food safety certification provider with extensive auditing for a wide range of food safety and business standards across the entire food and beverage supply chain – including Global Food Safety Initiative (GFSI) recognized standards.

Our food sector services include certification, training, assessment and supply chain solutions. Combined, they can help assure your customers and make your organization more resilient by enabling you to manage the risks and opportunities associated with your products, processes, people and respective supply chains.

With over 2,800 food and agri-food standards in our portfolio, we are well positioned to support the industry and the challenges faced by the supply chain including food safety, food security, sustainability, land usage, energy, water, business risk and corporate social responsibility issues.

To learn more about our solutions for the food sector visit [bsigroup.com/foodsafety-uk](https://www.bsigroup.com/foodsafety-uk)

## Questions?

Contact us directly using the details below or visit our website for the latest updates and listings of events and webinars.



Talk to us on: **+44 345 080 9000**  
email: **foodsafety@bsigroup.com**  
or visit: **bsigroup.com/foodsafety-uk**

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## Our food sector services



## Notes





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