BRC Packaging and Packaging Materials from issue 4 to issue 5 – what are the main changes

Audit and certification consequences

Issue 5 was published in July 2015, and the requirements are an evolution from previous issues. Issue 5 has more consistency with the Food standard and is moving from “Good Practice” to “Best Practice”. It is embedding Quality Management systems and has a better alignment with the Packaging Industry.

From January 1st, 2016 all BRC Packaging audits will be against Issue 5. Certificates issued against Issue 4 will remain valid for the duration indicated on the certificate.

This document lists a summary of the main changes and impact on you as a certificate holder. Please be aware that this is a summary and not an exhaustive list of all the requirements of the Standard.

The new standard is available from BRC (http://www.brcglobalstandards.com/) and is downloadable if you have a BRC-Participate subscription or a valid Packaging BRC certificate.

Changes to protocol

Hygiene Categories
The standard continues to have two hygiene categories:
a) High Hygiene – for items that are intended to come into direct contact with food or other hygiene sensitive product;
b) Basic Hygiene – intended for all other items, such as labels applied to other packaging materials through to the manufacture of tertiary (transit) packaging.

Fields of audit

Issue 5 contains 8 fields of audit (compared to 5 in issue 4):
1) Glass manufacture and forming
2) Paper making and conversion
3) Metal forming
4) Rigid Plastics forming
5) Flexible plastics manufacture
6) Other manufacturing
7) Print processes
8) Chemical processes.

In appendix 1 you can find an overview of these categories with examples.

Scope / exclusions from scope

Exclusions can only be approved by exception. Sites with exclusions on the certificate are not allowed to use the BRC logo.
Audit grading

To encourage differentiation and improvement, the audit grades are different from issue 4:

<table>
<thead>
<tr>
<th>Grade</th>
<th>Description</th>
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<tbody>
<tr>
<td>AA grade</td>
<td>5 or less minor NCs</td>
</tr>
<tr>
<td>A grade</td>
<td>6-10 minor NCs</td>
</tr>
<tr>
<td>B grade</td>
<td>11-16 minor NCs</td>
</tr>
<tr>
<td>C grade</td>
<td>17-24 minor NCs, 1 major and 11-16 minor NCs</td>
</tr>
<tr>
<td>D grade</td>
<td>25-30 minor NCs, 1 major and 17-24 minor NCs</td>
</tr>
</tbody>
</table>

AA, A and B grade result in a 1 year audit frequency, C and D grade in a 6 month audit frequency.

Optional Unannounced audits

Following the Food standard, unannounced audits are now also optional for Packaging. There are two options:

- Option 1 – full unannounced
- Option 2 – part announced, part unannounced

The + symbol will be added to the audit grade (e.g. A+).

Voluntary modules

BRC is developing voluntary modules as add on to the Standard. Available Modules are Traded Goods and Environmental Awareness Module (the latter one is not offered by ISACert).

BRC Global markets

The enrolment program is now broken down into a 3 tier audit renamed BRC Global Markets.

Changes to the Audit Requirements

This chapter lists the main changes, it is not an exhaustive list of all changes.

Fundamental requirements

Fundamental requirements remain in place and are unchanged for Issue 5, although the clause number may have altered. These are:

- Senior management commitment and continual improvement (1.1)
- Hazard and risk analysis (2.2)
- Specifications (3.4)
- Internal audits (3.5)
- Traceability (3.9)
- Housekeeping and cleaning (4.8)
- Process control (5.4)
- Training and competence (6.1)

A major non-conformity against the statement of intent of a fundamental clause will still result in non-certification of the audit.

Hazard and Risk management (chapter 2)

“Quality” is now included in the Statement of Intent (2.2).

Another addition is the inclusion of the risk of migration as a potential hazard in the manufacture and storage of packaging materials (2.2.5), as well as potential for malicious intervention, reflecting more current potential issues in the manufacture and use of packaging materials (2.2.5).

Product Safety and Quality Management (chapter 3)

Several clauses in section three have moved around to present a better flow and more logical order to be more in line with how sites operate and how they might be audited.

A new paragraph has been introduced to specifically manage the suppliers of service (3.8).

Management of incidents, product withdrawals and recalls (3.12) has been wholly readdressed and has now become management of product withdrawals, and incidents and product recalls. This is to better reflect how the packaging site will interact with the market and the hierarchy.
of events that a packaging manufacturer will face.

**Site Standards (Chapter 4)**

New clauses are added into the pest control paragraph (4.11). Some individual clauses have been added into pest control to ensure that where the site is managing its own pest control programme, appropriate measures are in place to ensure its effectiveness. Additionally, pest control equipment is required to be functional, and employees should feel empowered to report any signs of pest activity.

**Product and Process control (Chapter 5)**

This chapter contains 2 new paragraphs:
5.2: graphic design and artwork control
5.8: Control of incoming goods

Sites conducting any pre-print artwork-related activities are responsible for the artwork and have systems in place to maintain the integrity of the images. This is in addition to packaging print controls which are concerned with the printing process.

Storage of all materials and intermediate and finished products (5.9) and dispatch and transport (5.10) replace Issue 4’s transport storage and distribution to give adequate emphasis to the roles those two functions play in maintaining product integrity. There is no overlap with the Storage and Distribution Standard as the requirements relate only to what occurs on the site.

**Personnel (Chapter 6)**

Chapter 6 has few changes with clauses having moved to, or from the section rather than wholly new requirements. Staff facilities has moved from chapter 4, and access and movement of personnel has joined with layout and product flow in section 4 (now 4.5).

For more information contact your local ISACert office or look on our website http://www.isacert.com/ for an ISACert office near to you.
Appendix 1 – New categories with examples.

<table>
<thead>
<tr>
<th>MANUFACTURING CATEGORY</th>
<th>TYPICAL PACKAGING COMPONENTS/MATERIALS/ARTICLES</th>
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</table>
| Flexible plastics manufacture | Cast and blown plastic film, including vacuum metallised films and labels  
Multi-ply laminates of combinations of paper, plastics and aluminium foil  
Flexible intermediate bulk containers  
Regenerated cellulose film  
Plastic bags, pouches and sachets  
Non-edible casings |
| Other manufacturing | Pallets, boxes and crates, decorative wooden boxes  
Wood for food and cosmetic use, wooden utensils (e.g. for lollipops)  
Natural cork, rubber  
Hessian sacks, jute products, woven string (plastic or cotton) |
| Print processes | Any packaging material which is printed without pre- or post-print conversion and using the following print processes:  
• Flexographic, lithographic, gravure, letterpress (and offset)  
• Screen, tamp or digital print  
• Decoration by hot or cold stamping/blocking |
| Chemical processes | Resins  
Adhesives  
Inks, varnishes and coatings |

Composites shall be categorised by the component that contributes the highest percentage composition of the product, where the material makes up to 75% of the component (by weight).

Where the main material is less than 75% of the component, the next material categories shall also be used.

The assembly of aerosol valves, actuators and dispensing systems shall be categorised according to the majority material. Where additional materials are used (e.g. metal springs) the next material category shall also be used.