



Eurofins BRC-Packaging version 5 10-05-2016



Welkom

- Subjects:
 - Introduction
 - Changes version 4 to 5: protocol
 - Changes version 4 to 5: requirements
 - Version 5 in practice
 - questions



Van Voorst Consult

- Specialized in management systems
 - Food – ISO 9001 – environment – Safety and health – ISO 27001
- 5 consultants on payroll
- Several consultants as contractors
- Ton Kortekaas – consultant Food / environment– my CV is on the agenda



GFSI Recognized

- Global Food Safety Initiative
- Food – BRC – IFS – FSSC-22000- etc.
- Food related – packaging – logistics - Broker
- Food packaging:
 - FSSC 22000 (= ISO 22000 + ISO 22002-4)
 - IFS PACsecure
 - BRC-Packaging and Packaging materials





BRC-organization

- BRC = British Retail Consortium = cooperation between several (British) retailers
- First focus on requirements for food safety, now a wider focus is introduced
- Covering the whole food chain



BRC-organization

- www.brcglobalstandards.com - basis
- www.brcparticipate.com - a lot of background information, including interpretation guidelines ←
- www.brcbookshop.com - free download of the standard
- www.brcdirectory.com - check if company is certified



Protocol: type of product

Important for competence auditor:

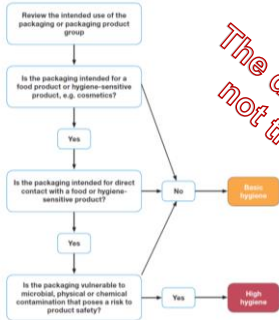
Issue 4	Issue 5
Glass	Glass manufacture and forming
Paper	Paper making and conversion
Metals	Metal forming
Plastics	Rigid plastics forming
	Flexible plastics manufacture
Wood and other materials	Other manufacturing
	Print processes
	Chemical processes



Protocol: Scope

- It will be more difficult to exclude products from scope:
- The BRC logo can only be used by sites that have no exclusions.
- The exclusion of products produced at a site will only be acceptable where:
 - the excluded products can be clearly differentiated from products within scope
 - AND
 - the products are produced in a physically segregated area of the factory.

Protocol: basic or high hygiene



The difference is not that big!

FIGURE 1 HYGIENE CATEGORY DETERMINATION DECISION TREE

Protocol: basic or high hygiene

- **High hygiene** Packaging that comes into direct contact with food products or other designated hygiene-sensitive products
- such as those intended for human consumption or that come into contact with the body; for example, by application to the skin.
- **Basic hygiene** Primary packaging not in direct contact with food or other hygiene-sensitive products; packaging for
- consumer products; and the secondary and tertiary packaging for all uses.
- For further guidance, consult Appendices 2 and 3, which provide examples of products for each manufacturing category and hygiene category.

Protocol: best practice guidelines

- Complaint handling
- Foreign body detection
- Internal audit
- Pest control
- Product recall
- Traceability

Available on BRC-Participate



Protocol: global markets programme

- Specially for small companies
- Standard focused on the prerequisite program
- No certificate
- Notification on www.brcdirectory.com





Protocol: voluntary modules

- Will be notified on the certificate
- On special request of several retailers
- At this moment:
 - Voluntary Module 7 Traded Goods
 - Voluntary Module 8 Environmental Awareness
 - What is next?

BRC does not have any in development at the moment



Protocol: unannounced audit programme

- From BRC-Food
- OPTION 1 – FULL AUDIT:
 - 1 audit – unannounced – may occur between months 3 and 12 of the audit due date, typically within the last 4 months



Requirements: Fundamentals

1. 1.1 SENIOR MANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT
2. 2.2 HAZARD AND RISK ANALYSIS
3. 3.4 SPECIFICATIONS
4. 3.5 INTERNAL AUDITS
5. 3.9 TRACEABILITY
6. 4.8 HOUSEKEEPING AND CLEANING
7. 5.4 PROCESS CONTROL
8. 6.1 TRAINING AND COMPETENCE: RAW MATERIALS HANDLING, PREPARATION, PROCESSING, PACKING AND STORAGE AREAS





Requirements: chapter 1

- Policy is not only about food safety but also about the quality and legal compliance!
- Policy is the focus of the whole management system!

Fundamental



Requirements: chapter 1

- Root cause analysis of non-conformities!
- For most companies it is difficult to fill this requirement.
 - Analyse of non conformities
 - Take one / two subjects with high impact
 - Perform a real root cause analyse



Requirements: chapter 2

HARM - Hazard and Risk Management

Fundamental

- based on HACCP (in turn Codex), with the 7 principles and 13 steps
- The key difference between HACCP and HARM: HARM addresses product quality and integrity as well as product safety, whereas HACCP focuses only on product (food) safety elements
- BRC calls it HARM because it's common for packaging manufacturers to have just one or even no CCPs.



Requirements: Chapter 2

Product quality:

- from site Eurofins: a few examples of performance tests:
 - Stability under load
 - Stability under when falling down
 - Thermal stability
 - Tensile strength
 - Colour fastness (EN 646, EN 648)
 - ...



Requirements: Chapter 2

- Addition of hazards that may be introduced by migration, and the potential for malicious intervention.



Requirements: chapter 3

- Explicit requirement for a manual has been removed but the site is required to have a series of processes and procedures in place to meet the requirements of the Standard.
- readily accessible system
- suitably protected to prevent loss or malicious intervention.



Requirements: chapter 3

Specifications:

- Appropriate specifications shall exist for raw materials, intermediate and finished products, and for any product or service which could affect the quality of the finished product and customer requirements.
- Specification review

Fundamental



Requirements: Chapter 3

Internal audits

- There shall be a scheduled program of internal audits throughout the year
- Risk based
- Covering the requirements of BRC-Packaging
- Non conformities shall be solved

Fundamental

Requirements: Chapter 3

- Suppliers:
 - 3.6 suppliers of materials
 - 3.7 Subcontracted processes
 - 3.8 Suppliers of services
 - pest control
 - laundry services
 - transport and distribution
 - storage and dispatch
 - sorting or rework
 - laboratory services
 - calibration services
 - waste management.

Requirements: chapter 3

3.9 Traceability

- ensure traceability at all stages of production
- From end product to raw material
- From raw material to (other) end products
- Backwards and forwards
- Including rework

Fundamental

Requirements: chapter 3

3.12 product withdrawals

- Realignment of the clause to address product withdrawals (or returns), which can be effected by the site, separately from product recalls which are effected by retailers and brand owners. Requirements re-ordered to reflect the hierarchy between withdrawals, and recalls and incidents.



Requirements: chapter 3

Product withdrawal vs recall

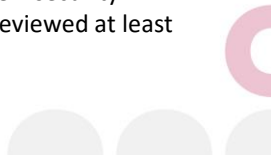
- Recognizing that the site cannot effect a product recall, but that it should have a product withdrawal procedure for its own products to be returned by its customers.





Requirements: Chapter 4

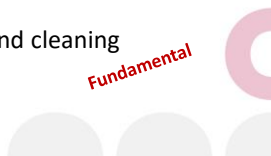
- 4.2 Protection of windows and roof glazing can be implemented on the basis of risk.
- 4.4 New requirement to document, implement and review security arrangements and reviewed at least annually.





Requirements: Chapter 4

- 4.7 Issue 5 requires a documented maintenance programme.
- Maintenance work shall be followed by a documented clearance procedure
- 4.8 Housekeeping and cleaning
- No changes





Requirements: Chapter 4

- 4.10 Where licensing is required by law for the removal of waste, it shall be removed by licensed contractors and records of removal shall be maintained and available for audit.
- Removal of agreement with customers. Substandard trademarked materials must always be subject to a destructive process prior to disposal.



Requirements: Chapter 4

4.11 Pest control

- New requirement to provide controls where the site is managing its own pest control without the assistance of an external contractor.



Requirements: Chapter 5

5.2 Graphic design and artwork control

- Artwork and all pre-press processes conducted by the site shall be managed to ensure loss of information and variation from customer specification is eliminated.

Fundamental



Requirements: Chapter 5

5.4 Process control

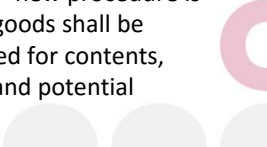
- New requirement for a bill of materials with the aim of aiding the site in process specification and traceability.

Fundamental



Requirements: Chapter 5

- 5.6.8: accreditation of laboratories
- Registration that the laboratory AND method is ISO 17025-certified will be more important.
- 5.8 Incoming goods – new procedure is required: incoming goods shall be appropriately checked for contents, packaging integrity and potential contamination.



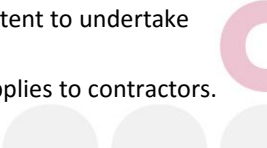


Requirements: Chapter 6

6.1 Training and competence

- The company shall ensure that all personnel are adequately trained, instructed and supervised commensurate with their activity and that they are competent to undertake their job role.
- Requirement also applies to contractors.

Fundamental



Requirements: Chapter 6

- 6.2.6 No requirement for metal-detectable plasters, but still colored plasters are prescribed.
- 6.3.11 Electronic cigarettes
- 6.5.7 No requirement for gloves to be disposable in Issue 5.

Version 5 in practice

- Differences between Certification Institutes
- Differences between auditors
 - Audits against best practice guidelines ?
- More focus on management commitment
- More focus on product quality and integrity
- More focus on root cause analyses
- Internal audits – throughout the year and riskbased

Version 5 in practice

Website: RASFF

- The Rapid Alert System for Food and Feed (RASFF), established in 1979, enables the rapid exchange of information whenever a risk to food or feed safety is identified. Members comprise 27 member states, the European Commission, the European Food Safety Authority, Iceland, Liechtenstein and Norway. This is part of the Europa website.
- http://ec.europa.eu/food/food/rapidalert/index_en.htm



Version 5 in practice

Website: **RASFF**

- 39 notifications from 01-01-2016
 - Glass
 - Plastics
 - metals



Version 5 in practice

If we have time:

- Presentation of BRC - Joanna Griffiths – Packaging Technical Manager and responsible for the Standard.

Packaging 5: the first audits



And finally

APPENDIX 5 CERTIFICATE TEMPLATE



For the scope of activities:
High hygiene or Basic hygiene

Fields of audit:
Including voluntary modules of:

Exclusions from scope:
Grade

Audit programme

Date(s) of audit

Certificate issue date:

Re-audit due date:

Certificate expiry date:



Questions





Thank you
for your attention