



BRCGS Packaging Materials Issue 6 – what are the changes?

Introduction

From February 1st, 2020, the BRCGS will be introducing BRCGS Packaging Materials Issue 6. Changes have been made to meet the requirements of the new GFSI benchmarking document as well as harmonising the Packaging standard with the BRCGS Food Safety.

You will be required to address changes for your site(s).

Please review the documents in detail and assess the actions required to meet the new requirements, as they are mandatory for all audits from the 1st of February 2020. Also note it is a BRCGS Packaging Materials Issue 6 scheme requirement that sites are familiar with the BRCGS Packaging Materials Issue 6. You should review these documents to implement the scheme's requirements.

Certified organisations must implement certain changes before their first audit in 2020. Please read the scheme documents carefully to identify which changes apply to your organisation.

Noteworthy changes include new ISO requirements.

Who is affected?

All organisations with a BRCGS Packaging Materials Issue 5 certified management system, are affected by these changes.

How to prepare for BRCGS Packaging Materials Issue 6

Organisations certified to BRCGS Packaging Materials Issue 5 must be audited to Issue 6 in 2020. This audit will take the place of a scheduled audit; no extra audit time will be required, and your certification dates and certificate number will not change. To prepare, you should:

- Obtain a copy of BRCGS Packaging Materials Issue 6 Standard <https://www.brcgs.com/>
- Also consider obtaining the BRCGS Packaging Materials Interpretation guideline and the Key Changes document (all certified sites can obtain these from their BRCGS Participate log in)
- Undertake a gap analysis
- Ensure you meet any new requirements
- Update your Management System

What are the changes and what does it mean for you?

To remain BRCGS Packaging Materials certified, you must ensure your management system conforms to the requirements of the Issue 6 Scheme by the time of your first audit in 2020. Key changes and considerations include:

- There are no increases in audit duration for the revision
- All audits from February 1st, 2020 will be to BRCGS Packaging Materials Issue 6
- Removal of the Low Hygiene category for simplification but with new risk-based requirements to ensure low hygiene sites are not disadvantaged. The requirements are now based on risk; the onus is now on the site to include this in the Hazard Analysis and Risk Assessment process (HARA)
- Introduction of a new fundamental clause, corrective and preventive actions in line with the other BRCGS Standards to ensure that the site addresses issues and takes steps to minimise the risk of occurrence on the future
- Introduction of a new section on product authenticity, claims and chain of custody to enable sites to establish suitable controls to help prevent fraud in their supply chains
- Microbiological environmental monitoring programme established. A position statement P558, has already been published to ensure that sites evaluate the need for a such a programme based on risk
- Integration of the requirements for the management of Traded Products into the main Standard to ensure greater visibility and control for traceability
- Greater emphasis on the identification and mitigation of quality defects during development and production
- Introduction of product safety and quality culture as for BRCGS for Food Safety Standard Issue 8. Audits to commence against clause 1.1.2 in February 2021 to enable both food and non-food sites to better understand how to implement in preparation for audits.

- For sites that are basic Hygiene in Issue 5 refer to the BRCGS P611 Technical Briefing document. It is recognised that sites currently operating to the basic hygiene level of certification require additional support to understand how to prepare for audits against the new Issue 6 of the Standard. The document has tables that provide a summary of the clauses that would be new to basic hygiene level sites with an indication with Y as to which clauses can be deviated from based on risk. The rule for non-applicable clauses also applies.

Additional modules (AMS)

Traded goods are now part of the main Standard which means module 7 Traded Goods will become obsolete with commencement of audits against Issue 6 on the 1st of February 2020.

Modules 8 and 9, Environmental Awareness (EAM) and Audit One respectively remain unchanged.

Plans for a new module are underway to control the release of process waste into the environment for the relevant manufacturing categories. Process waste includes pellets, flakes, off-cuts and powder.

Competency requirements for new modules will be advised as they are published.

Protocol

There has been a simplification of the unannounced audit programme for the Standard to just one option so that a site can choose either an announced or unannounced audit. This reflects a more consistent approach across the relevant Standards such as food and consumer products.

Auditor time spent on the factory floor has remained unchanged as detailed in part III section 2.2 of the Standard.

Help is at hand

https://www.saiglobal.com/en-gb/assurance/food_safety/standards_and_schemes/brc_global_standard_for_food_safety_issue_8/