

BRC/IoP Global Standard – Food Packaging and Other Packaging Materials

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British Retail Consortium

London: TSO

INTRODUCTION

■ Background

UK retailers and their suppliers of retail branded products must take ‘all reasonable precautions and exercise all due diligence’, in the development, manufacture, distribution, advertising or sale of food products to the consumer. Suppliers of packaging to UK retailers, or suppliers of packaging to food manufacturers providing retailer branded products, have an obligation to put appropriate systems and controls in place to ensure the suitability of their packaging for safe food use.

For many years, packaging manufacturers and suppliers have commissioned hygiene audits, in order to satisfy the ‘due diligence’ defence found in legislation and to improve their own premises and practices. Several retailers and food manufacturers have also inspected packaging premises in order to satisfy themselves that systems and procedures at their packaging suppliers meet their requirements.

In 2001 the British Retail Consortium (BRC) and the Institute of Packaging (IoP) developed the Technical Standard and Protocol for Companies Manufacturing and Supplying Food Packaging Materials for Retailer Branded Products to assist retailers and food manufacturers in the fulfilment of their legal obligations. The Standard was introduced to help in the protection of the consumer by providing a common basis for the evaluation of companies supplying packaging for food products to retailers.

The Standard has, since its introduction, become a benchmark by which evaluations of companies supplying packaging are undertaken.

It should be noted however, that the technical evaluation of supplying companies’ premises forms only part of the food manufacturer’s and retailer’s ‘due diligence’ requirements, and the acceptance for a company to supply food packaging rests with the individual retailer.

The Standard is not intended to replace the requirements of any legislation, where any such legislation requires a higher standard for any specific industry sector.

In accordance with the principles of review and continuous improvement the BRC and IoP worked closely with other stakeholders to develop the second issue of the document, *BRC/IoP Global Standard – Food Packaging and other Packaging Materials* (the BRC/IoP Packaging Standard).

■ The British Retail Consortium

The BRC is the trade association that represents the retail trade in the UK. Its members operate a variety of outlets from large multiples and department stores through to corner shops. The BRC is directly involved in a number of important issues affecting retailing and the consumer, including food safety, all forms of legislation, e-commerce, the environment and retail crime. The BRC lobbies opinion formers in the UK and the EU, on these and many other issues.

■ The Institute of Packaging

The IoP, as the professional membership body for the packaging industry, is of central and critical importance and provides membership services, learning opportunities and commercial activities for people in, and associated with, the wider packaging industry.

The IoP was established in 1947 for the education and training of those involved in this diverse industry. Members of the IoP are drawn from all sectors of the industry.

Its aims include:

- To offer a coherent and progressive programme of professional development
- To be the leading player in the UK for workforce development for the wider packaging industry
- To establish professional standards for the industry, along with appropriate membership grades and routes to membership to ensure membership is held in high regard by individuals and employers
- To increase membership continually through improving the way it serves members and increasing the benefits it offers
- To provide a range of attractive, relevant, accessible and timely member services and ensure members are offered appropriate support in their professional development and careers in the wider packaging industry
- To enable the Packaging Industry Awarding Body Company (PIABC) to develop a wide range of qualifications to meet the needs of a broad geographic and industry sector range.

■ BRC/loP Relationship

The loP has joined with the BRC in developing the BRC/loP Global Standard – Food Packaging and Other Packaging Materials. The BRC/loP Packaging Standard is a logical extension of the already established BRC Global Standard – Food.

It is recognised that the packaging industry is diverse in its materials, processes and technologies. Trade associations representing the Paper and Board, Aluminium and Steel, Glass and Plastics packaging industry sectors have all been consulted during the development and revision of this Standard. The loP has brought together the many needs of these sectors involved in the manufacture of food and non-food packaging. As the professional membership body for the packaging industry, The loP has satisfied itself that the requirements of this Standard can be practically achieved.

The Standard will be reviewed on a regular basis by the BRC and the loP and revised where considered appropriate.

The UK retail industry is unique in that retailer branded products represent a very high level of sales, which is increasing year-on-year, e.g. retailer branded products represent over 38% of sales in the food grocery market.

In many sectors, notably food, the retail branded products are market leaders and therefore protection and integrity of their 'brand' are critical issues to the majority of UK retailers.

It is also important to understand that within the UK market the vast majority of retailer branded products have been developed as 'high quality', and not as 'second quality', competing on price with branded products. The UK retail market is extremely competitive and consumer expectations are high and demanding.

Over 60% of all grocery sales in the UK are held by the largest five food retailers and these companies compete aggressively on quality, price and innovation. As a consequence the UK sources high volumes of products and ingredients from overseas companies to meet this consumer demand for innovation and to compete commercially. The consumer has the right therefore to expect that standards within companies supplying these products and ingredients are comparable to that found in the UK and there should be no compromise on safety or quality.

Product quality is seen as a competitive issue and as such is monitored and maintained by the UK retail industry and the Standard's users themselves; however with the development of BRC Technical Standards, the Quality

Management Systems and other specific requirements for companies supplying UK retailers are clearly defined. Competent evaluation of suppliers' systems and procedures is a means by which to measure the commitment of those companies wishing to supply this demanding market.

Companies who wish to gain certification to the BRC Technical Standards must fully understand their role to ensure that required standards are met and maintained.

■ Legislative Requirements

The UK is one of the very few countries which has a statutory 'due diligence' defence requirement within its legislative framework. This effectively means that a retailer cannot accept and rely on a 'warranty' defence, if legal proceedings were presented.

The due diligence defence is a general defence of 'all reasonable precautions and all due diligence' against principal offences in the relevant UK statutes and can be defined as 'it shall ... be a defence for the person charged to prove that he took all reasonable precautions and exercised all due diligence to avoid the commission of the offence by himself or by a person under his control'.

The relationship that existed between the Standard user and their suppliers was recognised by those involved with the development of guidance for the provision of a due diligence defence and the considerable influence of the retailer over product formulation/design, standards existing within the production environment and control systems were reflected by the content of guidance. The responsibility for the safety and legality of product is shared between the supplier and the retailer, with emphasis for the retailer being placed on five main areas of control, namely:

- 1 To ensure the presence of a detailed specification, which is not unlawful or inconsistent with any compositional/safety standards or good manufacturing practice
- 2 To ensure they satisfy themselves that a supplier is competent to produce the specified product, complies with legal requirements and operates appropriate systems of production control
- 3 From time to time make visits, where practical, to verify the competence of the supplier or receive the result of any other audit of the supplier's system for that purpose
- 4 To establish and maintain a risk-assessed programme for product examination, testing or analysis
- 5 To monitor and act upon customer complaints.

The BRC Technical Standards have been developed to ensure that these requirements are met and monitored.

Supplier evaluation against these Standards forms an integral part of a retailer's and Standard user's legal conformance systems and it is therefore essential that suppliers, certification bodies and accreditation bodies are fully aware of their responsibilities and their critical role within this legal framework.

■ Benefits of the BRC/IoP Packaging Standard

There are a number of benefits arising from the use of the BRC/IoP Standard:

- A single standard and protocol that allow an evaluation by third-party certification bodies which shall be accredited to European Standard EN45011
- Single verification commissioned by the manufacturer or supplier, in line with an agreed evaluation frequency, will allow both manufacturers and suppliers to report upon their status to food retailers and other

organisations as agreed

- The Standard is comprehensive in scope covering areas of quality, hygiene and product safety throughout the packaging industry
- The Standard addresses part of the ‘due diligence’ requirements of the packaging manufacturer/supplier, packer/filler and retailer. Packaging manufacturers may also use this Standard to ensure their suppliers are following good hygiene practices and complete the ‘due diligence’ chain
- Within the associated protocol, there is a requirement for ongoing surveillance and confirmation of the follow up of corrective actions on non-conformance to the Standard thus ensuring that a self-improving quality, hygiene and product safety system is established.

■ Principles of BRC/IoP Packaging Standard

The objective of the BRC/IoP Packaging Standard is to specify safety, quality and operational criteria required to be in place within a manufacturing organisation to supply packaging to UK retailers, their suppliers or Standard users. The format and content of the BRC/IoP Packaging Standard are designed to allow an assessment of a company’s premises and operational systems and procedures by a competent third party against the requirements of the Standard.

BRC and IoP recognise the importance of accreditation and during the development of all the Technical Standards have worked closely with the United Kingdom Accreditation Service (UKAS) to ensure that all the requirements of product certification are met.

Third-party bodies carrying out assessments must gain accreditation to ISO/IEC Guide 65 and meet the requirements within the BRC/IoP Packaging Standard and supporting documentation.

Significant efforts have been made to promote openness and transparency in the development and implementation process and to work closely with all stakeholders to ensure the integrity and robustness of the system.

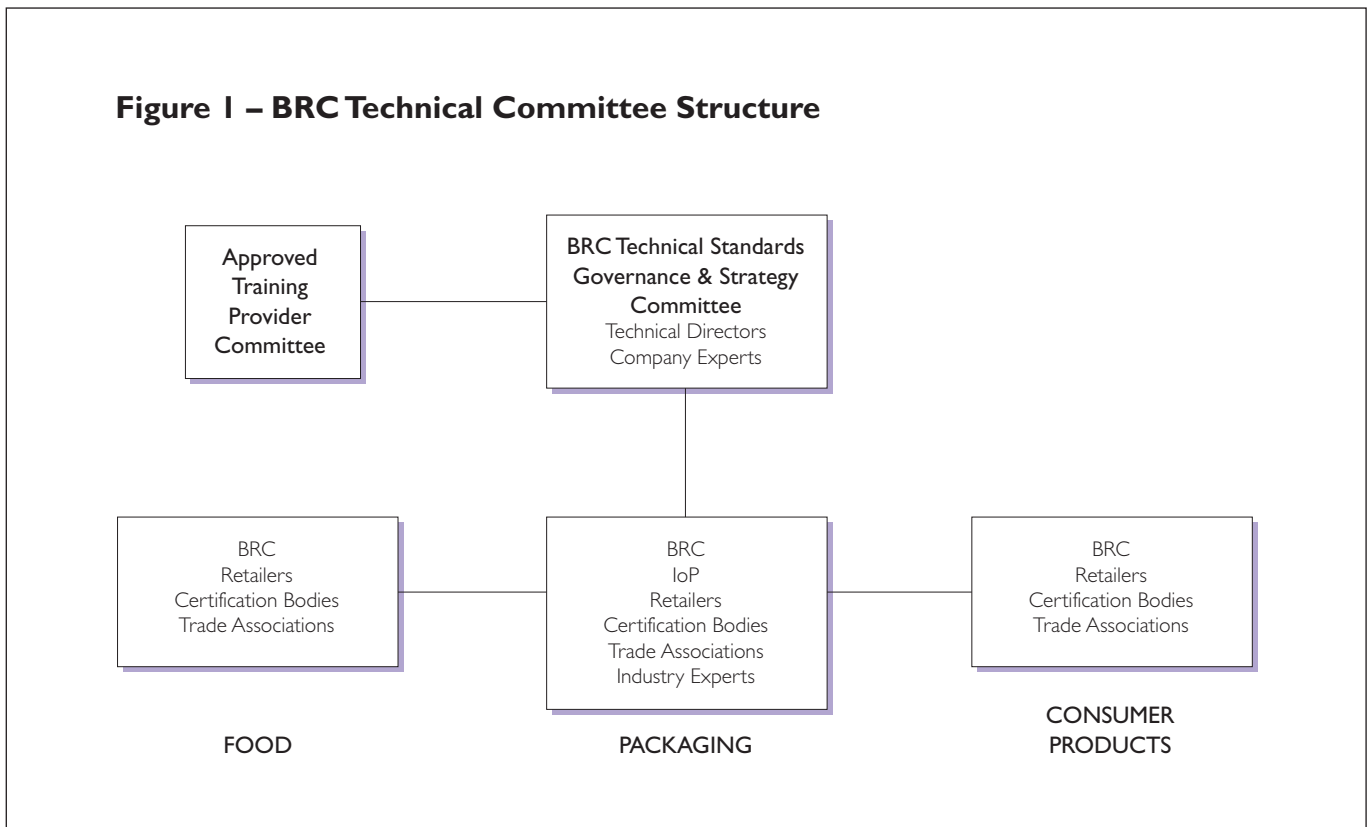
The principles of the BRC/IoP Packaging Standard are:

- to minimise duplication of evaluation
- to work in collaboration with accreditation bodies to ensure that the accreditation process delivers effective control and maintenance of the standards of evaluation
- to encourage ‘local’ evaluation
- to ensure openness, transparency and compliance with fair trading legislation
- to promote direct stakeholder participation during development and maintenance as part of technical advisory committees
- to continuously review and improve standards and supporting processes
- to promote ‘best practice’.

■ The Management of Standards

The BRC has brought together a number of interested parties and stakeholders within a formal committee framework to provide strategic direction and effective management of BRC Technical Standards (see Figure 1).

Figure I – BRC Technical Committee Structure



■ The BRC Standards Governance and Strategy Committee

Members are:

BRC members (Technical Directors or nominated Company Experts) and BRC management (Director of BRC Trading, Director of Food Policy and Head of Technical Services).

The functions of the Committee are:

- the approval of policies relating to the operation of activities with respect to BRC Standards
- to maintain an overview of policy implementation
- to oversee the performance of BRC Technical Standards Committees
- to handle appeals, disputes or grievances relating to BRC Technical Standards
- to receive reports on the activities of the Approved Trainer Provider Committee
- to establish working groups where appropriate to resolve issues.

■ The Standard Technical Advisory Committees

Members are:

BRC members; BRC

loP

trade associations' representatives; certification body representatives; UKAS representative (in attendance).

The functions of the Committee are:

- to act upon policy specified by the BRC Technical Standards Governance and Strategy Committee
- to review operational issues with respect to Standards
- to resolve any issues with respect to content or operation of Standards and communicate
- to put forward recommendations to the BRC Technical Standards Governance and Strategy Committee.

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

■ Accreditation

Accreditation provides assurance that accredited certification bodies are competent to carry out the work they undertake, therefore minimising business risk.

Accreditation is the key to ensure that consumers, suppliers and purchasers can have confidence in the quality and safety of the product.

Accreditation by the national accreditation body means that evaluators have been assessed against internationally recognised standards to demonstrate their competence, impartiality and performance capability. It provides benefits of the avoidance of cost and time involved with the reassessment of product testing and, as the national accreditation body is independent, it will help demonstrate due diligence in the event of legal challenge.

With regard to the competence of the evaluators employed by certification bodies, this is defined in supporting documentation issued to them. There are defined fields of evaluation (product categories), which can be assessed by individual evaluators. It is the responsibility of the certification body to appoint the appropriate evaluator to perform an evaluation.

Confirmation of the scope of accreditation for individual certification bodies shall be provided within accreditation schedules. These schedules are published by the national accreditation body.

■ Certification

Accredited certification bodies evaluate companies to confirm conformity of product to meet the specified requirements laid down within the BRC Technical Standards.

Re-evaluation by the certification bodies will be carried out at a specified frequency to demonstrate the continued conformity of the certified product with the required Standard.

Only those certification bodies who have accreditation to ISO/IEC Guide 65 with a scope, which includes meeting the requirements of the Standard (or actively seeking accreditation to ISO/IEC Guide 65, reference next paragraph), shall carry out evaluations against a BRC Standard and issue appropriate certificates.

These organisations shall comply with the requirements of the United Kingdom Accreditation Service Regulations (UKAS) and guidance published by the European Co-operation for Accreditation (EA) or the International Accreditation Forum (IAF).

BRC recognises that to achieve accreditation certification bodies must be able to demonstrate their competence to carry out evaluation against the BRC Standards. Therefore, a certification body shall be allowed to carry out evaluations prior to achieving accreditation status, where they can demonstrate all the following:

- an active application for ISO/IEC Guide 65 accreditation
- accreditation will be achieved within 12 months of the date of application and individual personnel experience and qualification in the field of evaluation will be consistent with the standards within this document.

These organisations will also comply with the requirements of the BRC specified within the document, 'Requirements for Organisations Offering Certification Against the Criteria of The British Retail Consortium Technical Standards'. This document is available on the BRC website (www.brcglobalstandards.com).

BRC has developed an open scheme for those certification bodies wishing to work with BRC Standards and has worked closely with national accreditation bodies and individual certification bodies to ensure full compliance with requirements and consistency of activity.

Certification bodies registered with BRC are listed on the BRC website (www.brcglobalstandards.com) and their status, i.e. recognised or seeking recognition, relates to the progress made to demonstrate full compliance with requirements.

The relationship between accreditation and certification is summarised as shown in Figure 2, but the reader must be aware that certification bodies are accredited and companies are certificated.

■ The Relationship between BRC, IoP, Accreditation Bodies and Certification Bodies

Figure 3 illustrates the mechanism by which BRC wishes to interact and communicate with both certification bodies and accreditation bodies.

BRC recognises the benefits of working closely with both UK and overseas accreditation and certification bodies and fully endorses the IAF principles of cross-frontier accreditation and would actively encourage participation by accreditation bodies.

The detailed requirements relating to both accreditation bodies and certification bodies are specified in documents formally issued by BRC to these bodies.

Those accreditation and certification bodies working with BRC Standards are listed on the BRC website (www.brcglobalstandards.com).

■ The BRC/IoP Packaging Standard Requirements

The Standard requires:

- the adoption of a formal Hazard Analysis System
- a documented Technical Management System
- the control of factory standards, products, processes and personnel.

Figure 2

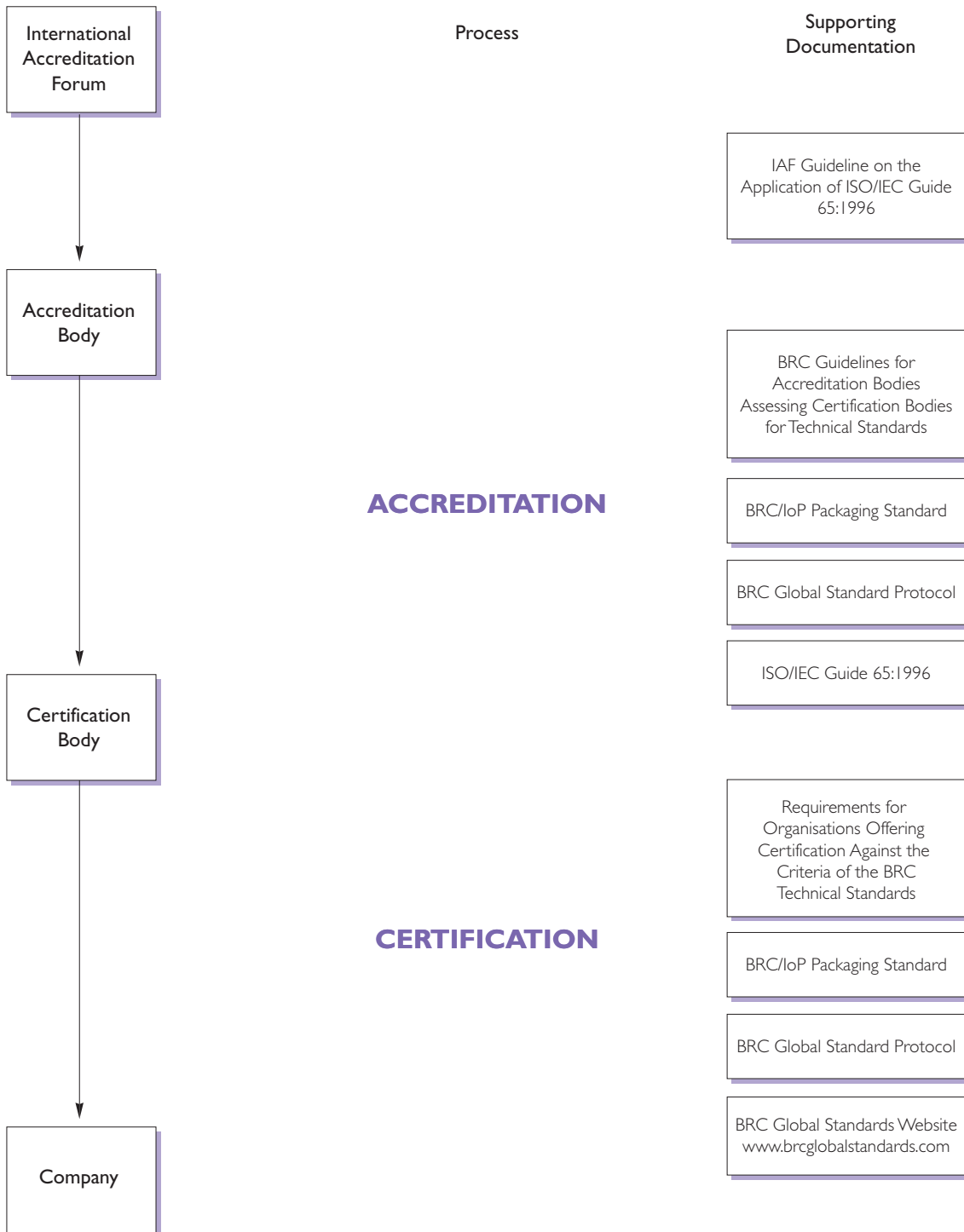
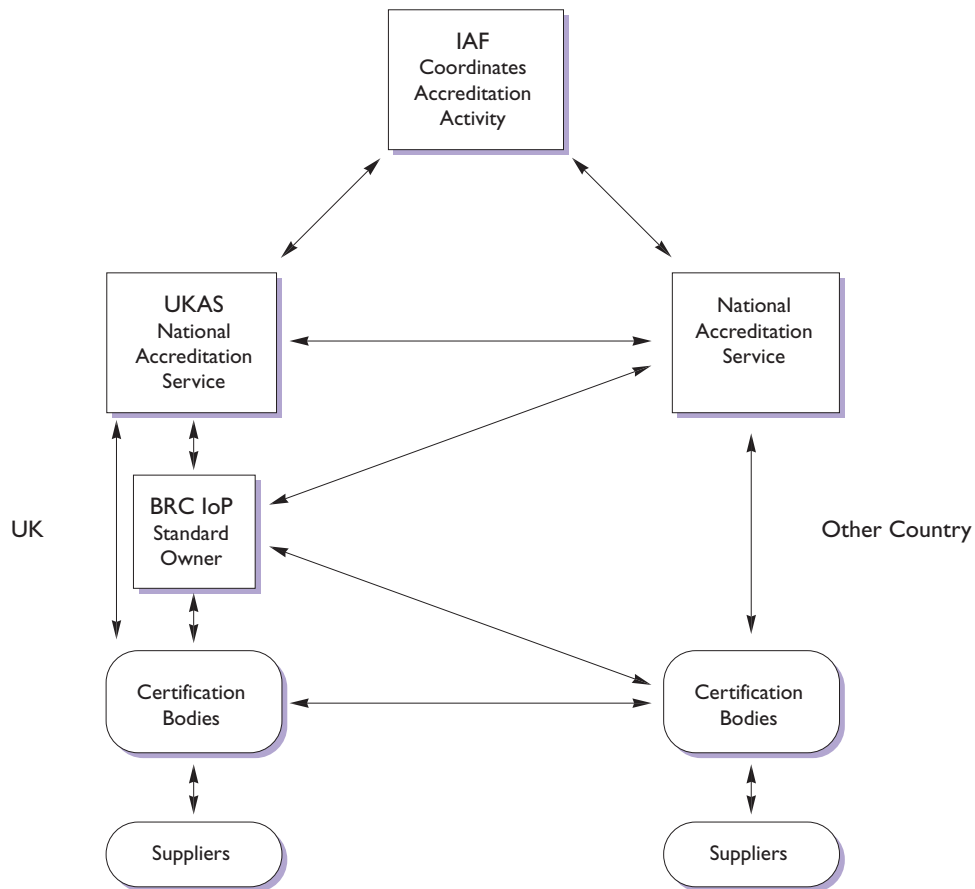


Figure 3



■ The Format of the BRC/loP Packaging Standard

Each section of the Standard begins in bold type within a coloured background with a statement of intent. All packaging suppliers shall comply with this statement in order to gain certification.

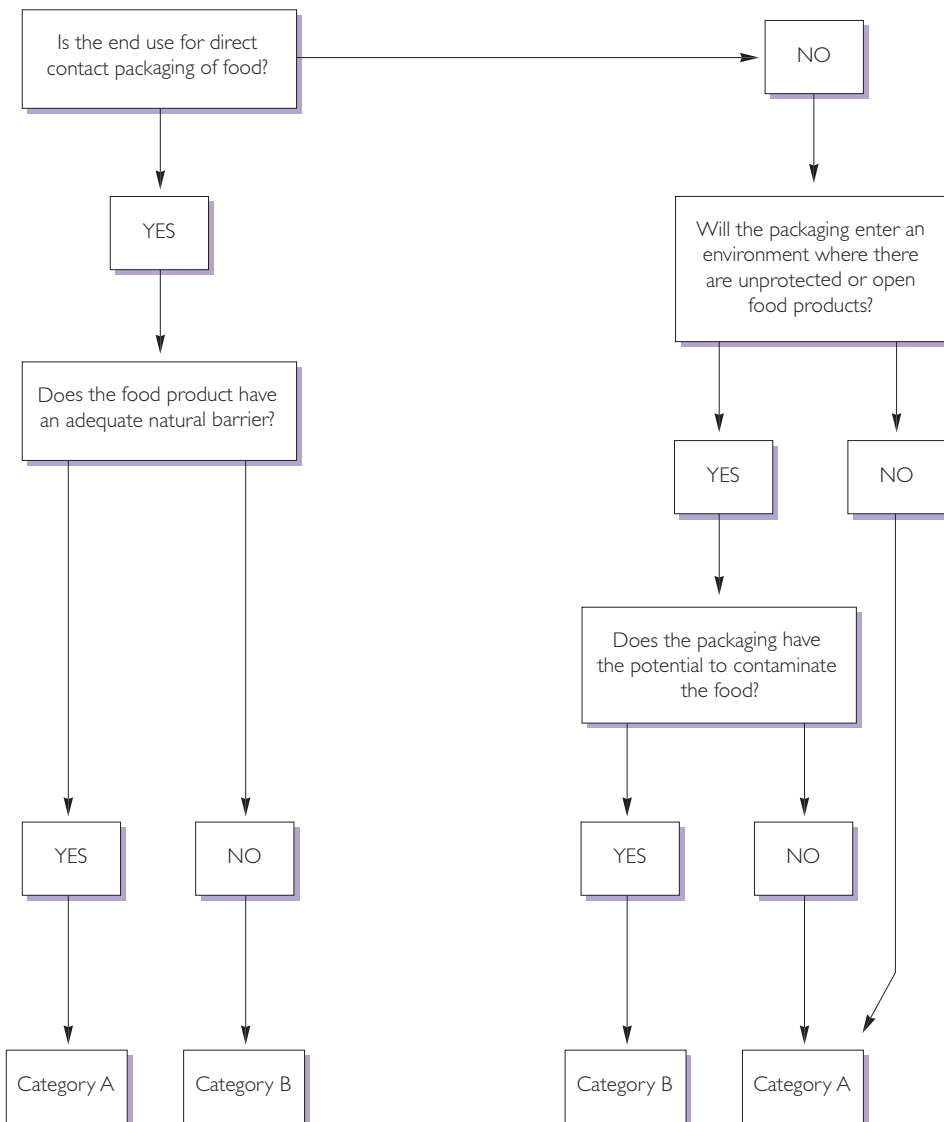
Below this statement of intent there are sections, in a tabular format, which specify the criteria against which the evaluation will be carried out and provide guidance notes to assist the supplier to meet the requirements of the Standard.

There are two categories of risk associated with the manufacture or supply of packaging as defined by a decision tree with different levels of requirements (see Figure 4).

Technical Standards throughout this document refer to both Hygiene and Quality Systems. The evaluation protocol, found within this document, provides specific requirements for those companies seeking certification to the Standard.

Sections 5–7 of this Standard divide the requirement into two categories of hazards associated with the manufacture or supply of packaging.

There is a decision tree (see Figure 4) as a guide to aid the understanding of these two levels of risk and

Figure 4 – Decision Tree

subsequent hazards and to provide an example of their application. Category A provides for a lower-risk category and B for hazards of greater severity.

The final decision on the level applicable to a manufacturing site will be made by a hazard analysis that could include the requirements of the customer.

■ Risk Category Determination

A decision tree has been provided as a guide to assist in the establishment of category A or B (see Figure 4).

This section deals with manufacturing processes and the control of hygiene. As these vary according to product and production technology they cannot be prescribed in the remainder of the Standard for each separate manufacturing process.

Documented hazard analysis, carried out and recorded, may show that some aspects of production can be exempted from some of the provisions of this Standard. The evaluator may accept the hazard analysis and confirm the exemptions. Acceptance of the exemptions shall be recorded in the evaluators' report.

The company shall keep 'Exemptions to the Standard' under review. Production of satisfactory documentation at subsequent evaluations shall lead to continued acceptance of the exemptions.

Each manufacturer and supplier shall check, by means of hazard analysis, in conjunction with the decision tree, the category to which their production unit belongs.

It is recognised that many manufacturers or suppliers fall into both categories A and B. In these circumstances they may either choose to use the higher hazard category B for the entire factory or separate them by areas. It is not envisaged that both categories would be mixed within the same area.

Where there is any doubt, the higher hazard category should be adopted.

If there is no clear definition of 'Product Rating' or 'Risk Category', referral shall be made by the company to the BRC for clarification (www.brc.org.uk/standards/contact.asp).

■ The Relationship of the BRC/IoP Standard with Other Standards

The ownership and copyright of this document reside jointly with the BRC and the IoP.

Certification bodies may make reference to the Standard in their own documents providing due acknowledgement is given.

■ Liability

This Standard has been produced after the exercise of all reasonable care and skill in its completion, preparation and issue, but is published without liability in its application and use.

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