

Dear all,

**BRCGS Packaging Materials** sets out the requirements for the manufacture of packaging materials that are used in:

- the manufacture of, and filling operations for:
  - food, beverages and feed
  - hygiene-sensitive consumer products (including cosmetics and pharmaceutical products)
  - raw materials, and other consumer products such as single use disposable products (where appropriate).

The Standard shall not apply to packaging or materials (with the exception of traded products) that do not undergo any process at the site audited, or to activities relating to wholesale, importation, distribution or storage outside the direct control of the company.

Audits against **Packaging Materials** Issue 6 will be valid up to 27 April 2025; **from 28 April 2025 all audits will be against Issue 7.**

**In the transition of unannounced audits from Issue 6 to Issue 7, BRCGS provides the following table:**

Unannounced audit due date	Typical audit window	Comment	Standard to be used for the audit
Before 28 April 2025	Jan 2025 to April 2025		Issue 6
28 April to 26 May 2025	Feb to May 2025	Aim to complete the audit prior to the 28 April	Issue 6
26 May to 23 Jun 2025	Mar 2025 to Jun 2025	When the audit date is after the 28 April the audit will be against Issue 7  Aim to complete the audit prior to 28 April 2024	Issue 6 is prior to 28 April 2025  Issue 7 if audit after 28 April 2025
23 Jun to 21 July 2025	April 2025 to July 2025	Aim to complete the audit after the 28 April	Issue 7 only
21 July to 18 Aug 2025	May 2025 – Aug 2025		Issue 7 only

The main changes in the new version 7 are:

### **Scope of the Standard**

- √ Hazard analysis and risk assessment (HARA), has received a comprehensive review, but mostly in the structure of the sub-clauses not in the intent or requirements of the HARA processes, documentation, support, validation and verification.
- √ The Standard recognises that in the packaging sector, allergenic components are rare in the composition of product, but that considering allergen management in manufacturing sites is important. Therefore, awareness in allergen issues and the need for allergen training have been enhanced in the standard. Therefore, auditors should also be knowledgeable in allergen management requirements suitable for the packaging industry.
- √ The scope of the standard has been revised and now sets out requirements for the manufacture of packaging materials that are used in:
  - the manufacture of, and filling operations for:
    - food, beverages and feed
    - hygiene-sensitive consumer products (including cosmetics and pharmaceutical products)
    - raw materials, and other consumer products such as single use disposable products (where appropriate).

### **Products, packaging materials, raw materials**

- √ The Standard has been reviewed to include all packaging materials, packaging raw materials and other products manufactured using similar technologies. These other products include single use disposable products. When including single use disposal products in the scope of certification for a site, the following requirements must be met: 70% of the manufacturing activities on site are associated with packaging materials

### **Requirements**

- √ Section 1 - Senior management commitment
  - Clause 1.1.1, clear commitment towards product safety and quality culture is introduced
  - Clause 1.1.2, clear indication of the topics that need to be consider as part of continual improvement plan
  - Clause 1.1.3, introduces confidential reporting system
  - Clause 1.2.4, awareness of personnel to personnel shall be aware of the need to report any risks or evidence of unsafe practice

- √ Section 2 - Hazard analysis and risk assessment
  - Full revision in line with GFSI requirements and CODEX Alimentarius
  - Several clauses were added; 2.2.1, 2.5.3, 2.7.2, 2.7.3, 2.10.1
  - Clause 2.2.1-2/ Prerequisite programmes
  - Clause 2.5.1/ Clear inclusion of allergenic contamination risks in the hazard analysis
  - Clause 2.7.2/ Clear requirement, concerning the validation of critical control measures
  - Clause 2.7.3/ Only competent (trained) and authorised personnel can change equipment's settings
  - Clause 2.10.1/ Clear requirement, concerning the validation of HARA plan
  - Adaptation and use of term critical control measure
- √ Section 3 - Product safety and quality management
  - Only one clause was added; 3.14.6, for the notification of Certification body in case of significant product safety or legality incident (e.g., product recall, etc.). Notification shall be conducted within 3 working days.
  - Clause 3.1.1, has been amended to consider all languages spoken on site
  - Clause 3.4.1, additional requirement for the specifications of packaging materials that impacts or provides a functional effect on safety of final product
  - Clause 3.5.1, internal audits shall be spread throughout the year
  - Clause 3.5.4, clarification on the handling of non-conformities that were noticed during the internal audits
  - Clause 3.6.1, distinguish between initial and ongoing approval procedure
  - Clause 3.6.2, clarification that the above clause is applicable for the initial approval of raw materials' suppliers and incorporation of changes that establish wider options for the initial approval of raw materials' suppliers (comparing to the previous issue)
  - Clause 3.7, additions to include consideration of all fraudulent activities
  - Clause 3.8, outsourced operations reflect to the new terminology for outsourced processing. Traceability during outsourced operations is highlighted
  - Clause 3.9.1, outsourced processes, external expertise, training providers and maintenance providers are clearly included in the list of services' suppliers in need of approval
  - Clause 3.10.4, traceability should be achievable within 4 hours, in harmonization with BRCGS Food Standard
  - Clause 3.14, reformation of related requirements, so as to be more comprehensive. Addition of clause 3.14.6, as described at the beginning of the current paragraph
- √ Section 4 - Site standards

- A number of clauses in this section have been added or amended towards better comprehension or alignment with other BRCGS Standards.
  - Clause 4.2.2, added to incorporate clear requirements, concerning doors
  - Clause 4.4, guidance about product defense
  - Clause 4.6, specifications and authorization prior to sourcing new equipment and risk base commissioning to be implemented, in alignment with BRCGS Food Standard
  - Clause 4.8.6, guidance in regards with the review of the environmental monitoring program (annually review)
  - Clause 4.9.4, need for the establishment of an allergen management plan (NEW CLAUSE)
  - Clause 4.9.5, providing more details for other potential physical contaminants (NEW CLAUSE)
- √ Section 5 - Product and process control
- A number of clauses in this section have been added or amended to align with other Standards
  - Clause 5.4.6, stating the need for procedures in place in the event of equipment failure (NEW CLAUSE)
  - Clause 5.4.7, stating the need for quantity verification, if it is necessary (NEW CLAUSE)
  - Clause 5.4.8, ensuring the requirements for retained samples (NEW CLAUSE)
  - Clause 5.4.10, control of products, materials and areas outside the scope of certification (NEW CLAUSE)
  - Clause 5.5.2, more clear requirement, concerning the accuracy of measuring equipment regarding to the product parameters being controlled (NEW CLAUSE)
  - Clause 5.6.2, validation of inspection or testing procedure to ensure accuracy and reproducibility (NEW CLAUSE)
- √ Section 6 - Personnel
- No new requirements were added; clause have been amended to ensure procedures are in place and include necessary information
  - Clause 6.5.8, provision of details, concerning the storage of protective clothing (NEW CALUSE)
- √ Section 7 - Requirements for traded products
- The key change is the incorporation of Section 7.1; all operations shall now be considered as part of the HARA plan (already existing or specific for traded products)
  - Clause 7.1.1, requirement for HARA plan for all product and processes for which the site is responsible, including traded products (NEW CLAUSE)



## BRCGS PACKAGING MATERIALS TRANSITION TO VERSION 7

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- Clause 7.2.2, incorporation of changes that establish wider options for the initial and ongoing approval of traded products' suppliers (in alignment with clause 3.6.2)
- Clause 7.6, traceability of traded products shall be included in the procedure and the traceability should be achievable within 4 hours

*Should you have any questions regarding the transition process don't hesitate to contact us at*

[info@qmscert.com](mailto:info@qmscert.com)

*Further relevant documents are available on the BRCGS webpage*

<https://www.brcgs.com/our-standards/packaging-materials/>

and

for downloading the new Standard, Interpretation Guideline, and Key changes via BRCGS Participate

<https://www.lgcassure.com/participate>