BRCGS Packaging Materials

ISSUE 6
PACKAGING
MATERIALS

Guide to Key
Changes

GUIDE TO KEY CHANGES
Issue 6
Packaging Materials

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For more information about BRCGS, contact:

BRCGS
Second Floor
7 Harp Lane
London EC3R 6DP

Tel: +44 (0) 20 3931 8150
Email: enquiries@brcgs.com
Website: www.brcgs.com

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Contents

Introduction

BRCGS published Issue 6 of the Global Standard for Packaging Materials (hereafter referred to as the Standard) in August 2019 and the new Standard will be used for all audits conducted from 1 February 2020. Certificates issued against Issue 5 will remain valid for the duration indicated on the certificate.

This document is intended to provide an introduction to the new Issue 6 and a guide to the changes (including the reasons) since Issue 5. It provides a full list of all the changes to the requirements and should be used as a reference by companies who need to update their quality systems in preparation for an audit against Issue 6. A full interpretation guideline which provides guidance on all the clauses is also available, together with a number of topic-specific guidelines. All these documents can be obtained from BRCGS Participate (www.brcgsparticipate.com) or purchased separately from the BRCGS bookshop (www.brcgsbookshop.com).

Background to the production of Issue 6 and objectives

Consultation and development process

The Standard is globally recognised and used around the world. Prior to starting the review for Issue 6, BRCGS undertook an extensive consultation with the users of the Standard to understand its strengths and to identify any potential areas for improvement. It also sought to discover any emerging concerns across the industry and from the general public.

The detail of the Standard was developed using two multi-stakeholder working groups: one in North America and one in Europe. Each group was made up of industry representatives from retailers, certification bodies, trade associations, packaging material manufacturers and, in Europe, the accreditation body, the UK Accreditation Service (UKAS).

The feedback on Issue 5 was positive with product safety and legality central to the Standard and its alignment with the benchmarking requirements of the Global Food Safety Initiative (GFSI). This is reflected in a significant increase in the number of users. In addition to simplifying the audit protocol, the key objectives from the working groups established in North America and Europe along with the public consultation were to:

- sharpen and clarify the scope with a change of the name from Packaging and Packaging Materials to Packaging Materials. The scope covers packaging materials for food and non-food products
- ensure global and continued alignment with GFSI benchmarking requirements, including microbial environmental monitoring
- introduce product safety and quality culture to the requirements of the Standard
- manage and control packaging raw material in pellet, flake and powder form and process waste
- consolidate the requirements for corrective and preventive action into a new fundamental clause
- enhance transparency and the process control of product quality, particularly printed packaging product
- embed robust processes to mitigate the risk to the authenticity, claims and chain of custody of packaging materials
- bring into the main Standard the requirements for the control of traded goods.

The draft Standard was released in December 2018. All of the comments received on the draft were reviewed before the final version was produced. BRCGS would like to thank all those people who have contributed to the development of Issue 6 of the Standard.

Environmental monitoring

The use of monitoring techniques within the factory is an important tool for identifying potential product contamination risks, especially risks associated with micro-organisms (both pathogens and spoilage organisms). This is a new requirement to encourage sites to develop rigorous monitoring programmes, enabling them to take timely corrective action before product contamination occurs.

Product security and product defence

The need for companies to have rigorous product security and defence systems to prevent malicious contamination has gained importance since the publication of Issue 5.

Key changes to the requirements for Issue 6

Hygiene levels

Issue 5 published two levels of hygiene, basic and high, to reflect the risk-based requirements for different manufacturing sites to minimise the risk of contamination before, during and after production. However, from research, the basic hygiene level has had very little uptake. Following consultation and agreement, in this issue of the Standard, the basic- and high-level hygiene requirements have been consolidated into one level based on risk.

Additional modules

Issue 5 was designed to enable the addition of voluntary modules to the routine audit, to enable sites to demonstrate compliance with specific sets of requirements to meet specific market or customer requirements. This process will continue for Issue 6.

Traded products

Issue 5 introduced a traded goods module for sites that store and sell food and/or non-food consumer products that are not manufactured, processed or packed on site. Issue 6 has incorporated these requirements into the main text of the Standard (section 7). This has the advantage of locating the text within the main document, thus allowing the module to be accredited at the same time as the rest of the Standard.

Environmental module

There has been an increased international recognition of the negative environmental impact of the poorly controlled release of raw materials and process waste, particularly plastic in the form of pellets, flakes, powders, dusts and offcuts. Proper handling of such process waste is now required under clause 4.10.2. BRCGS (with the agreement of the working groups) plans to develop a new module to support manufacturers and packers of these materials to ensure that they meet safety and regulatory requirements. Publication of the new environmental module is planned for January 2020 and users can opt to be audited against it during the main audit from 1 February 2020.

Changes to the audit protocol

There have been a few changes to the way in which the Standard is audited and certificated (full details can be found within Part III of the Standard). The main changes and reasons for the changes are summarised below.

Global Markets programme

The Global Markets programme has undergone a full review to ensure that it remains applicable and relevant for smaller sites and those who are developing their product safety and quality systems. The revised scheme (now called START!) is going through a pilot phase and is currently not available to the Standard.

Unannounced audits

Previous versions of the Standard have provided two options for unannounced audits:

- **Option 1** A single unannounced audit
- **Option 2** A split audit with an unannounced audit of good manufacturing practices and a later, announced audit, primarily to review records and procedures.

The Option 2 split audit has consistently proven to be unpopular, with very few sites electing to be audited in this way. It has therefore been removed from the Standard.

The unannounced audit programme remains voluntary and sites can still continue to opt for an announced or an unannounced audit.

Detailed changes to the requirements

This part of the document highlights the changes between Issues 5 and 6 and provides a brief commentary on the reasons for each change, where applicable.

Changes in Issues 5 and 6 have been highlighted in red text. Please note, however, that it is the responsibility of the site to study all the requirements of the Standard and to ensure that these are understood and suitable processes are in place to ensure compliance.

A separate interpretation guideline is available which gives details on how each requirement may be met. This is available via an online subscription to BRCGS Participate, or may be purchased separately from the BRCGS bookshop.

1 Senior management commitment

1.1 Senior management commitment and continual improvement

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging and Packaging Materials. This shall include provision of adequate resources, effective communication and systems of review to ensure continual improvement. Opportunities for improvement shall be identified, implemented and fully documented.		The site's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging Materials.		Focus on responsibility of site. Removal of second sentence, addressed in clause 1.1.4, to focus on commitment of site to the implementation of the Standard.
Clause	**Requirements**	**Clause**	**Requirements**	
1.1.1	The site shall have a documented policy which states the site's intention to meet its obligation to produce safe and legally compliant products to the specified quality, and confirms its responsibility to its customers. This shall be: • signed by the person with overall responsibility for the site • communicated to all staff.	1.1.1	The site shall have a documented policy which states the site's intention to meet its obligation to produce safe and legally compliant products to the specified quality and confirms its responsibility to its customers. This shall be: • signed by the person with overall responsibility for the site • communicated to all staff.	

Clause	Requirements	Clause	Requirements	
		1.1.2	The site's senior management shall define and maintain a clear and effective plan for the development and continual improvement of a product safety and quality culture. This shall include: • defined activities involving all sections of the site that have an impact on product safety and quality • a description of how the activities will be undertaken and measured, and the intended timescales • a review of the effectiveness of completed and ongoing activities. Clause effective from 1 February 2021.	New clause addressing product safety and quality culture and ensuring consistency with Food Safety Issue 8.
1.1.2	The site's senior management shall establish clear objectives to maintain and improve the quality, safety and legality of products manufactured, in accordance with the product safety and quality policy and this Standard. These objectives shall be: • documented and include targets or clear measures of success • clearly communicated to relevant staff • monitored, and the results reported at a suitable predetermined frequency to the site's senior management • reviewed at least annually.	1.1.3	The site's senior management shall establish clear objectives to maintain and improve the quality, safety and legality of products manufactured, in accordance with the site's product safety and quality policy and this Standard. These objectives shall be: • documented and include targets or clear measures of success • clearly communicated to relevant staff • monitored, and the results reported at a suitable predetermined frequency to the site's senior management.	Removed last point as addressed in clause 1.2.1.

Clause	Requirements	Clause	Requirements	
1.1.3	The company's senior management shall provide the human and financial resources required to effectively implement the processes of the quality management system and product safety programme and maintain compliance with this Standard.	1.1.4	The company's senior management shall provide the human and financial resources required for the production of safe packaging material, to the required quality, and in compliance with the requirements of this Standard.	Amended wording in line with Food Safety Issue 8, and to focus on the intent of allocation of human and financial resources.
1.1.4	The company's senior management shall have a system in place to ensure that the site is kept informed of and reviews: • scientific and technical developments • industry codes of practice • all relevant legislation applicable in the country of manufacture and, where known, the country where the product will be used • any changes to the Standard or protocol published by the BRC.	1.1.5	The company's senior management shall have a system in place to ensure that the site is kept informed of and reviews: • scientific and technical developments • industry codes of practice • all relevant legislation applicable in the country of manufacture and, where known, the country where the product will be used. Products shall meet the minimum legal requirements in the country of manufacture and of use where known.	Removed 4th bullet point as covered in clause 1.1.6. Addition of legal compliance, formerly in clause 3.4.3 of Issue 5.
1.1.5	The site shall have a genuine, current hard copy or electronic version of the Standard available.	1.1.6	The site shall have a genuine, original hard copy or electronic version of the current Standard and be aware of any changes to the Standard or protocol that are published on the BRCGS website.	Amended wording consistent with the digital services offering from BRCGS.
1.1.6	Where the site is certificated to the Standard, it shall ensure that recertification audits occur on or before the audit due date indicated on the certificate.	1.1.7	Where the site is certificated to the Standard, it shall ensure that recertification audits occur on or before the audit due date indicated on the certificate.	

Clause	Requirements	Clause	Requirements	
1.1.7	The most senior production or operations manager on site shall participate in the opening and closing meetings of the audit for the Global Standard for Packaging and Packaging Materials certification. Relevant departmental managers or their deputies shall be available as required during the audit.	1.1.8	The most senior production or operations manager on site shall participate in the opening and closing meetings of the audit for certification to the Standard. Relevant departmental managers or their deputies shall be available as required during the audit.	Wording changed for consistency with Food Safety Issue 8.
1.1.8	The site's senior management shall ensure that the root causes of non-conformities identified at the previous audit against the Standard have been effectively addressed to prevent recurrence. A system shall be in place to close out non-conformities raised in internal, second-party and third-party audits, with consideration of the root cause.	1.1.9	The site's senior management shall ensure that the root causes of any non-conformities identified at the previous audit against the Standard have been effectively addressed to prevent recurrence.	Removed second sentence as addressed in new corrective and preventive action section (section 3.6).
		1.1.10	The BRCGS logo and references to certification status shall be used only in accordance with the conditions of use detailed in the audit protocol section (Part III, section 5.6).	New clause, outlining the rules around use of the BRCGS certificated logo.

1.2 Management review

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The site's senior management shall ensure that a management review is undertaken to ensure that the product safety and quality system is both fully implemented and effective, and that opportunities for improvement are identified.		The site's senior management shall ensure that a management review is undertaken to ensure that the product safety and quality management system is both fully implemented and effective, and that opportunities for improvement are identified.		
Clause	**Requirements**	**Clause**	**Requirements**	
1.2.1	Management review meetings attended by the site's senior management shall be undertaken at appropriate planned intervals; as a minimum annually.	1.2.1	Management review meetings attended by the site's senior management shall be undertaken at appropriate scheduled intervals (at a minimum annually) to review the site's performance against the Standard and the objectives set out in clause 1.1.3.	Updated wording to ensure that the focus of the review is on the implementation and use of the Standard and the setting and progress of objectives.
1.2.2	The review process shall include the evaluation of: • previous management review documents, action plans and timeframes • results of internal, second-party and third-party audits • customer performance indicators, complaints and feedback • review of the hazard and risk management (HARM) system • incidents, corrective actions, out-of-specification results and non-conforming materials • resource requirements • the site's performance against the Standard and the objectives set • the effectiveness of root cause analysis and corrective actions.	1.2.2	The review process shall include the evaluation of: • previous management review documents, action plans and timeframes • the results of internal, second-party and third-party audits • any customer performance indicators, complaints and feedback • the effectiveness of the hazard and risk management (HARM) system • the impact of any applicable legislative and certification scheme changes • any incidents, corrective actions, out-of-specification results and non-conforming materials • resource requirements	Additional and edited bullet points around the required content of review. Last bullet point removed as addressed in corrective and preventive action section (section 3.6).

Clause	Requirements	Clause	Requirements	
			• any objectives that have not been met, to understand the underlying reasons. This information shall be used when setting future objectives and to facilitate continual improvement • the effectiveness of the product defence and product fraud prevention plans.	
1.2.3	The meeting shall be documented and used to revise the objectives. The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff, and actions implemented within agreed timescales.	1.2.3	The meeting shall be documented and used to revise the objectives. The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff, and actions implemented within agreed timescales.	
1.2.4	The site shall have a demonstrable system in place which enables product safety, legality and quality issues to be brought to the attention of senior management and allows for the resolution of issues requiring immediate action.	1.2.4	The site shall have a demonstrable system in place which enables product safety, legality, integrity and quality issues to be brought to the attention of a designated manager. The system shall allow for the resolution of issues requiring immediate action.	Reworded for clarity and intent.

1.3 Organisational structure, responsibilities and management authority

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality, regulatory compliance and quality.		The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality, regulatory compliance and quality.		
Clause	**Requirements**	**Clause**	**Requirements**	
1.3.1	The site shall have a current organisation chart demonstrating the management structure of the company. The responsibilities for the management of activities which ensure product safety, quality and legality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.	1.3.1	The site shall have a current organisation chart demonstrating the management structure and reporting channels of the company. The responsibilities for the management of activities which ensure product safety, quality and legality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.	Inclusion of reporting channels, previously in clause 1.3.2 of Issue 5.
1.3.2	Clear communication and reporting channels shall be in place to report on and monitor compliance with the Standard.			Removed as addressed in clause 1.3.1.
1.3.3	The site's senior management shall ensure that all employees are aware of their responsibilities. Where documented work instructions exist for activities undertaken, the relevant employees shall have access to these and be able to demonstrate that work is carried out in accordance with the instructions.	1.3.2	The site's senior management shall ensure that all employees are aware of their responsibilities. Where documented work instructions exist for activities undertaken, the relevant employees shall have access to these and be able to demonstrate that work is carried out in accordance with the instructions.	

2 Hazard and risk management system (now Hazard and risk management)

2.1 Hazard and risk management team

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		**Comments**
A multidisciplinary hazard and risk management team shall be in place to develop and manage the hazard and risk management system and ensure the system is fully implemented and evaluated for its effectiveness.		A multidisciplinary hazard and risk management team shall be in place to develop and manage the hazard and risk management system and to ensure that the system is fully implemented and evaluated for its effectiveness.		
Clause	**Requirements**	**Clause**	**Requirements**	
2.1.1	The hazard and risk management system shall be developed, reviewed and managed by a multidisciplinary team that includes those responsible for quality, technical, engineering/ maintenance, production operations and other relevant functions. In the event that the site does not have the appropriate expertise in-house, external expertise may be used to analyse any hazards and the risk of them occurring, and/or develop and review the hazard and risk management system. However, the day-to-day management of the system shall remain the responsibility of the site.	2.1.1	The hazard analysis and risk assessment shall be developed, reviewed and managed by a multidisciplinary team that includes those responsible for quality, technical, engineering/ maintenance, production operations and other relevant functions. In the event that the site does not have the appropriate expertise in-house, external expertise may be used to analyse any hazards and the risk of them occurring, and/or develop and review the hazard and risk management system. However, the day-to-day management of the system shall remain the responsibility of the site.	The analysis is the focus of the ongoing development, review and management by the team.
2.1.2	The multidisciplinary team shall have a designated team leader who shall be suitably trained and able to demonstrate competence and experience of hazard and risk analysis.	2.1.2	The multidisciplinary team shall have a designated team leader who shall be suitably trained and able to demonstrate competence and experience of hazard and risk analysis.	
2.1.3	The team shall be able to demonstrate competence in hazard and risk analysis principles and be kept up to date with factory changes and customer requirements as they occur.	2.1.3	The team shall be able to demonstrate competence in hazard and risk analysis principles and be kept up to date with factory changes and customer requirements as they occur.	

2.2 Hazard and risk analysis (now Hazard analysis and risk assessment)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
A documented hazard and risk management system shall be in place to ensure that all hazards to product safety, quality and legality are identified and appropriate controls established.		A documented hazard analysis and risk assessment (HARA) shall be in place to ensure that all hazards to product safety and legality are identified and appropriate controls established.		Terminology updated throughout the clauses to focus on analysis as the activity. References to quality have been removed from this section.
Clause	**Requirements**	**Clause**	**Requirements**	
2.2.1	The scope of the hazard and risk analysis shall be clearly defined and documented and shall cover all products and processes included within the intended scope of certification.	2.2.1	The scope of the hazard analysis and risk assessment shall be clearly defined and documented and shall cover all products and processes included within the intended scope of certification.	
2.2.2	The hazard and risk analysis team shall maintain awareness of and take into account: • historical and known hazards associated with specific processes, raw materials or intended use of the product (where known) • known likely product defects that affect safety or quality • relevant codes of practice or recognised guidelines • legislative requirements.	2.2.2	The HARA team shall maintain awareness of and take into account: • historical, known and foreseeable product safety hazards associated with specific processes and raw materials • intended use of the product (where known) • known likely product defects that affect safety • relevant codes of practice or recognised guidelines • legislative requirements.	Potential hazards associated with the product safety of processes or raw materials should be considered.

Clause	Requirements	Clause	Requirements	
2.2.3	A full description of the product shall be developed, which includes all relevant information on product safety, quality and integrity. As a guide this may include: • composition (e.g. raw materials, inks, varnishes, coatings and other print chemicals) • origin of raw materials, including use of recycled materials • intended use of the packaging materials and defined restrictions on use; for example, direct contact with food or other hygiene-sensitive products, or the physical or chemical conditions.	2.2.3	A full description of the product, product group and process shall be developed, which includes all relevant information on product safety and integrity. As a guide this shall include: • composition (e.g. raw materials, inks, varnishes, coatings and other print chemicals) • origin of raw materials, including use of recycled materials • intended use of the packaging materials and defined restrictions on use; for example, direct contact with food or other hygiene-sensitive products, or the physical or chemical conditions.	'May' has been replaced with 'shall' to ensure these bullet points are addressed.
2.2.4	A flow diagram shall be prepared for each product, product group or process. This shall set out each process step from the receipt of raw materials to dispatch to the customer. As a guide this shall include, as relevant: • receipt and approval of artwork • receipt and preparation of raw materials such as additives, inks and adhesives • each manufacturing process step • in-line testing or measuring equipment • the use of rework and post-consumer recycled materials • any subcontracted processes • customer returns. The accuracy of the process flow shall be validated by the hazard and risk analysis team.	2.2.4	The process flow diagram prepared for each product, product group and process shall set out each process step from the receipt of raw materials, through manufacture and storage, to dispatch to the customer. As a guide this shall include, where applicable: • receipt and approval of artwork and specification • receipt and preparation of raw materials such as additives, inks and adhesives • each manufacturing process step • in-line testing or measuring equipment • the use of rework and post-consumer recycled materials • any subcontracted processes • customer returns.	The flow diagram is first introduced here as a function of the product description. This clause lists the process steps in the flow diagram, adding in receipt of specification, manufacture and storage. The last paragraph has been moved to a separate clause (clause 2.2.5) to give it more emphasis.

Clause	Requirements	Clause	Requirements	
		2.2.5	The accuracy of the process flow diagram shall be verified by the HARA team at least once per year and following any significant incidents or process changes.	As one of the most commonly raised non-conformities through the life of Issue 5, this has been separated into its own requirement.
2.2.5	The hazard and risk analysis team shall identify and record all potential hazards that are reasonably expected to occur at each step in relation to the product and process. The hazards considered shall include, where relevant: • microbiological • foreign objects • chemical contamination (e.g. taint, odour, allergen, component transfer from inks, varnishes and glues) • potential problems arising from the use of recycled materials • legality • defects critical to consumer safety • hazards that may have an impact on the functional integrity and performance of the final product in use • potential for unintended migration of substances from the packaging material into food or other hygiene-sensitive product • potential for malicious intervention.	2.2.6	The HARA team shall identify and record all potential product safety hazards that are reasonably expected to occur at each step in relation to the product and process. The hazards considered shall include, where relevant: • microbiological hazards • chemical contamination (e.g. taint, odour, allergen, component transfer from inks, varnishes and glues) • potential for unintended migration of substances from the packaging material into food or other hygiene-sensitive products • foreign objects • potential problems arising from the use of recycled materials • foreseeable misuse by the consumer • defects critical to consumer safety • hazards that may have an impact on the functional integrity and performance of the final product in use • potential for malicious intervention • potential for raw material fraud.	Some additional bullet points have been included, notably the potential for raw material fraud and foreseeable misuse by the consumer, such as using containers for a purpose other than that for which they were intended.

Clause	Requirements	Clause	Requirements	
2.2.6	The hazard and risk analysis team shall identify control measures necessary to prevent, eliminate or reduce each hazard to acceptable levels. Controls for identified hazards to product quality shall be appropriately managed through the prerequisite programme, as set out in section 5. Where control is through prerequisite programmes these shall be reviewed to ensure they adequately control the risk identified and, where necessary, improvements implemented.	2.2.7	The HARA team shall identify control measures necessary to prevent, eliminate or reduce each product safety hazard to acceptable levels. Where control is through prerequisite programmes as set out in sections 3, 4 and 6, these shall be reviewed to ensure they adequately control the risk identified and, where necessary, improvements implemented.	The focus here is on product safety hazards, which later result in critical control points (CCPs) if the prerequisite programmes are deemed insufficient to manage the hazard.
2.2.7	For each hazard that requires control, other than by an existing prerequisite programme (as set out in sections 4–6), the control points shall be reviewed to identify those that are critical. This process shall include an assessment of the risk level for each hazard based on the likelihood of the occurrence and the severity of the outcome. Critical control points shall be those control points that are required to prevent, eliminate or reduce a product safety or integrity hazard to acceptable levels. Where a control point is not classified as critical and control may be achieved through a prerequisite programme, a programme shall be developed that is sufficiently specified to effectively control the identified hazard(s).	2.2.8	For each hazard that requires control, other than by an existing prerequisite programme, the control points shall be reviewed to identify those that are critical. This process shall include an assessment of the risk level for each hazard based on the likelihood of the occurrence and the severity of the outcome. Critical control points (CCPs) shall be those control points that are required to prevent, eliminate or reduce a product safety hazard to acceptable levels. Where a control point is not classified as critical and control may be achieved through a prerequisite programme, a programme shall be developed that is sufficiently specified to effectively control the identified hazard(s).	

Clause	Requirements	Clause	Requirements	
2.2.8	For each critical control point, the appropriate critical limits shall be defined in order to identify clearly whether the process is in or out of control. Critical limits shall be measurable, where possible, and the rationale for their establishment clearly documented. Relevant legislation and codes of practice shall be taken into account when establishing the limits.	2.2.9	For each CCP, the appropriate critical limits shall be defined in order to identify clearly whether the process is in or out of control. Critical limits shall be measurable, where possible, and the rationale for their establishment clearly documented. Relevant legislation and codes of practice shall be taken into account when establishing the limits.	
2.2.9	For each critical control point, a monitoring system shall be defined in order to ensure compliance with critical limits. Records of the monitoring shall be maintained. Documented procedures relating to the monitoring of critical controls shall be included in internal audits against the Standard (see clause 3.3).	2.2.10	For each CCP, a monitoring system shall be defined in order to ensure compliance with critical limits. Records of the monitoring shall be maintained. Documented procedures relating to the monitoring of critical controls shall be included in internal audits against the Standard (see clause 3.5).	
2.2.10	The corrective action that shall be taken when monitored results indicate a failure to meet the control limit shall be established and documented. This shall include the procedures for quarantining and evaluating potentially out-of-specification products to ensure they are not released until their safety, quality and legality can be established.	2.2.11	The corrective action that shall be taken when monitored results indicate a failure to meet the control limit for CCPs shall be established and documented. This shall include the procedures for quarantining and evaluating potentially out-of-specification products to ensure they are not released until their safety, quality and legality can be established.	Critical control points added.

Clause	Requirements	Clause	Requirements	
2.2.11	A review of the hazard and risk management system and prerequisite programmes shall be carried out at least once per year and following any significant incidents or when any process changes. The review shall include a verification that the hazard and risk analysis plan is effective and may include a review of: • process changes • product composition changes • complaints • product failures • finished product recalls from consumers (including system tests) • product withdrawals • results of internal audits of prerequisite programmes • results from external and third-party auditors • new developments in industry associated with materials, process or product.	2.2.12	A review of the hazard and risk management system and prerequisite programmes shall be carried out at least once per year and following any significant incidents or when any process changes. The review shall include a verification that the hazard analysis and risk assessment plan is effective. It shall also include any: • process changes • product composition changes • complaints • product failures and finished product recalls from consumers (including system tests) • product withdrawals • results of internal audits of prerequisite programmes • results from external and third-party audits • new developments in the industry associated with materials, process or product.	'Shall' instead of 'may', ensuring each bullet point is addressed.

2.3 Exemption of requirements based on risk analysis (removed)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The hazard and risk analysis study shall be fully supported by the implementation of the prerequisites set out in requirements clauses 4 to 6. However, the hazard and risk analysis may indicate that some of the requirements may be exempted.				Statement of intent and clauses removed on the basis that any exemptions will require a fully documented risk assessment.
Clause	**Requirements**	**Clause**	**Requirements**	
2.3.1	Exemptions shall be documented and regarded as proposed exemptions for review at audit. Acceptance or rejection of the proposed exemptions shall be recorded in the auditor's report.			
2.3.2	The site shall keep recorded exemptions to the Standard under review and provide documented evidence of this review at subsequent audit.			

3 Product safety and quality management

3.1 Product safety and quality management system

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		**Comments**
The site's processes and procedures to meet the requirements of this Standard shall be documented to allow consistent application, facilitate training, and support due diligence in the production of a safe and legal product.		The site's processes and procedures to meet the requirements of this Standard shall be documented to allow consistent application, facilitate training, and support due diligence in the production of a safe and legal product.		
Clause	**Requirements**	**Clause**	**Requirements**	
3.1.1	The site's documented procedures, working methods and practices shall be collated in a navigable and readily accessible system, with consideration being given to translation into appropriate languages.	3.1.1	The site's documented policies, procedures, working methods and practices shall be collated in a navigable and readily accessible system, with consideration being given to translation into appropriate languages. Where the site is part of a company governed by a head office, the interaction between the site's system and that of other sites and the head office should be documented. All policies and procedures necessary for the operation of the site being assessed must be available at the site.	Addition of 'policies', recognising that sites document systems in different ways. Requirement to have visibility of head office or corporate systems where the site is part of a group with remote head office activities.
3.1.2	The system shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary.	3.1.2	The system shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary.	

3.2 Documentation control (now Document control)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
An effective document control system shall ensure that only the correct versions of documents, including recording forms, are available and in use.		An effective document control system shall ensure that only the correct versions of documents, including recording forms, are available and in use.		
Clause	**Requirements**	**Clause**	**Requirements**	
3.2.1	The company shall have a documented procedure to manage documents which form part of the product safety and quality system. This shall include: • a list of all controlled documents indicating the latest version number • the method for the identification and authorisation of controlled documents • a record of the reason for any changes or amendments to documents • the system for the replacement of existing documents when these are updated.	3.2.1	The company shall have a documented procedure to manage documents which form part of the product safety and quality management system. This shall include: • a list of all controlled documents indicating the latest version number • the method for the identification and authorisation of controlled documents • a record of the reason for any changes or amendments to the documents • the system for the replacement of existing documents when these are updated.	
3.2.2	Where documents and records are in electronic form these shall be suitably protected to prevent loss or malicious intervention.	3.2.2	Where documents and records are in electronic form these shall be: • stored securely (e.g. with authorised access, control of amendments, or password-protected) • backed up to prevent loss or malicious intervention.	Broadening of the requirement to tackle the potential for loss of electronic documentation.

3.3 Record-keeping

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The site shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.		The site shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.		
Clause	**Requirements**	**Clause**	**Requirements**	
3.3.1	Records shall be legible, appropriately authorised, retained in good condition, and retrievable. Where records are in electronic form these shall be suitably backed up to prevent loss.	3.3.1	Records shall be legible, appropriately authorised, retained in good condition, and retrievable.	Second sentence removed as located in clause 3.2.2.
3.3.2	Any alterations to records shall be authorised and justification for the alteration shall be recorded.	3.3.2	Any alterations to records shall be authorised and justification for the alteration shall be recorded.	
3.3.3	The company's senior management shall ensure that documented procedures are established and implemented for the organisation, review, maintenance, storage and retrieval of all records relating to product safety, legality, regulatory compliance and quality.	3.3.3	The company's senior management shall ensure that documented procedures are established and implemented for the organisation, review, maintenance, storage and retrieval of all records relating to product safety, legality, regulatory compliance and quality.	
3.3.4	The period of retention for records shall relate to the usable life of the packaging and products it is designed to contain and shall respect any customer requirements.	3.3.4	The site shall document its period of retention for records which relate to the usable life of the packaging and the products it is designed to contain, and shall respect any customer requirements.	The site is required to document its period of retention.

3.4 Specifications

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
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.		Appropriate specifications shall exist for raw materials, intermediate and finished products, and for any product or service which could affect the safety, quality or legality of the finished product and customer requirements.		Safety and legality are a concern of specifications as well as product quality.
Clause	**Requirements**	**Clause**	**Requirements**	
3.4.1	Specifications shall be suitably detailed and accurate, and shall ensure compliance with relevant product safety and legislative requirements.	3.4.1	Specifications shall be suitably detailed, accurate and compliant with relevant product safety and legislative requirements. They may be in the form of a printed or electronic document, or part of an online specification system.	Method of specification is accommodated.
3.4.2	The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed then the company shall be able to demonstrate that they have taken steps to put an agreement in place.	3.4.2	The company shall seek formal agreement of specifications with relevant parties where required by the customer. Where specifications are not formally agreed, then the company shall be able to demonstrate that it has taken steps to put an agreement in place.	Recognition included that not all customers require agreement of specifications.
3.4.3	A declaration of compliance shall be maintained which enables users of the packaging materials to ensure compatibility between those materials and the product with which they may be in contact. The declaration of compliance shall contain as a minimum: • the nature of the materials used in the manufacture of the packaging • confirmation that the packaging materials meet relevant legal requirements	3.4.3	Where packaging for food or other hygiene-sensitive products is produced, a statement of compliance shall be maintained which enables users of the packaging to ensure compatibility between the packaging and the product with which it may be in contact. The statement of compliance shall be compiled and authorised by a suitably competent person. It shall contain as a minimum: • the nature of the materials used in the manufacture of the packaging	Because of the removal of different hygiene levels, this clause applies only to sites manufacturing packaging that will come into direct contact with food or other hygiene-sensitive products. Terminology changed from 'declaration' to 'statement' to remove the explicit reference to EU legislation, as the requirements of the Standard apply globally.

Clause	Requirements	Clause	Requirements	
	• the inclusion of any post-consumer recycled materials. This shall identify any limitations of use of the product and the usable life of the packaging material (where relevant). Products shall meet at least minimum legal requirements in the country of manufacture, and use, where known.		• confirmation that the packaging meets relevant legal requirements • the inclusion of any post-consumer recycled materials. The statement shall identify: • its date of issue and, where appropriate, its expiry date • any limitations of use of the product, and • the usable life of the packaging (where relevant). The site shall review the statement of compliance at a risk-based frequency.	Legal requirement sentence removed as addressed elsewhere. Review of the statement for validity required on the basis of risk.
3.4.4	The presence of manufacturer's trademarks or logo on packaging materials shall, where appropriate, be formally agreed between relevant parties.	3.4.4	The presence of a manufacturer's trademarks or logo on packaging materials shall, where appropriate, be formally agreed between the relevant parties.	
3.4.5	A specification review process shall be operated where product characteristics change or at an appropriate predetermined interval.	3.4.5	A specification review process shall be operated where the product composition or characteristics change or at an appropriate predetermined interval. Reviews and changes shall be documented and communicated to the customer, where required. Any changes to existing agreements or contracts shall be agreed, documented and communicated to appropriate departments.	Composition change is now also a trigger for specification review. Changes to be appropriately communicated to the customer. Link made between the specifications and agreements with the customer; requirement to communicate any changes throughout the site.
3.4.6	Where specifications are in electronic form these shall be suitably protected to prevent loss or malicious intervention.			

3.5 Internal audits

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company shall be able to demonstrate that it verifies the effective application of the requirements of the Global Standard for Packaging and Packaging Materials through internal audits.		The company shall be able to demonstrate that it verifies the effective application of the requirements of the Standard and any applicable module through internal audits.		Applicable modules used by the site should be included in the internal audit programme.
Clause	**Requirements**	**Clause**	**Requirements**	
3.5.1	There shall be a scheduled programme of internal audits throughout the year with a scope which covers the hazard and risk management system, prerequisite programmes and all procedures that have been implemented to achieve this Standard. All activities shall be covered at least annually. The internal audit programme shall be fully implemented.	3.5.1	There shall be a scheduled programme of internal audits. The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All processes shall be audited at least annually. The internal audit programme shall be fully implemented and effective.	Emphasis that the frequency of audits should be based on risk assessment, which includes previous audit performance. Poor performance should initiate more frequent audits, and better performance can reduce frequency. Scope is tackled in subsequent clause.
3.5.2	The scope and frequency of the audits shall be established in relation to the risks associated with the activity and previous audit performance.	3.5.2	As a minimum, the scope of the internal audit programme shall include the: • HARA or product safety and quality plan, including the activities to implement it (e.g. supplier approval, corrective actions and verification) • prerequisite programmes (e.g. hygiene, pest control) • product defence and product fraud prevention plans • procedures implemented to achieve the Standard and modules. Each internal audit within the programme shall have a defined scope and consider a specific activity or section of the HARA or product safety plan.	Aligned with requirements of Food Safety Issue 8. Determination of frequency tackled in previous clause. Bullet points list the minimum required scope of internal audits.

Clause	Requirements	Clause	Requirements	
3.5.3	Internal audits shall be carried out by appropriately trained, competent auditors. Auditors shall be sufficiently independent from the process being audited to ensure impartiality (i.e. they must not audit their own work).	3.5.3	Internal audits shall be carried out by appropriately trained and competent auditors. Auditors shall be independent from the process or activity being audited to ensure impartiality (i.e. they must not audit their own work).	Reworded for clarity.
3.5.4	Internal audit reports shall identify conformity as well as non-conformity. Results shall be notified to the personnel responsible for the process audited. Root cause analysis shall be used to determine appropriate corrective actions. Corrective actions and timescales for their implementation shall be agreed and completion of the actions verified.	3.5.4	Internal audit reports shall identify conformity as well as non-conformity. Results shall be notified to the personnel responsible for the process/activity audited. Root cause analysis shall be used to determine appropriate corrective actions and a designated manager shall be responsible for the implementation.	Responsibility for root cause analysis to lie with a designated manager. Implementation of corrective actions removed as addressed in section 3.6.
		3.5.5	For sites manufacturing materials intended to be in contact with food or other hygiene-sensitive products, in addition to the internal audit programme, there shall be a separate programme of documented inspections to ensure that the factory environment and processing equipment are maintained in a suitable condition. At a minimum, these inspections shall include: • hygiene inspections to assess cleaning and housekeeping performance • inspections to identify risks to the product from the building or equipment. The frequency of these inspections shall be based on risk.	New requirement for sites manufacturing additional materials to ensure that the factory environment is in a suitable condition. Frequency of inspections to be based on risk.

3.6 Corrective and preventive action (new)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
		The site shall be able to demonstrate that it uses the information from failures in its systems and processes to take any necessary corrective and preventive actions.		New fundamental statement of intent, collating mentions of root cause analysis and corrective and preventive actions from Issue 5 into one section.
Clause	**Requirements**	**Clause**	**Requirements**	
		3.6.1	The site shall have a procedure for the completion of root cause analysis and corrective actions and to determine preventive actions. As a minimum, root cause analysis shall be used to implement ongoing improvements and to prevent recurrence of non-conformities in the event of: • an analysis of non-conformities for trends which shows that there has been a significant increase in a type of non-conformity • a non-conformity which places the safety, legality, integrity or quality of a product at risk (including withdrawals) • the results of internal, second- or third-party audits • customer complaints • failure of in-line testing equipment • any incidents.	This clause lists the specific instances where root cause analysis and corrective and preventive actions are required (although more can be added if the site deems it is appropriate). Initially though, the site needs to document its procedure.
		3.6.2	The site shall evaluate the effectiveness of root cause analyses, and of any corrective and preventive actions.	Any activity around root cause analysis and corrective and preventive action should be evaluated for its effectiveness.

3.6 Supplier approval and performance monitoring (now 3.7)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company shall operate effective, documented procedures for approval and monitoring of its suppliers.		The company shall operate effective procedures for the approval and monitoring of its suppliers.		
Clause	**Requirements**	**Clause**	**Requirements**	
3.6.1	The site shall have a documented supplier approval procedure and continual assessment programme in place, based upon risk analysis. These shall apply to suppliers of: • materials • subcontracted processes to the site and ensure that materials and services procured conform to defined requirements, where there is a potential impact to product safety, quality or legality.	3.7.1	The site shall have a documented supplier approval procedure and continual assessment programme in place, based upon risk analysis and defined performance criteria. These shall apply to the suppliers of: • materials • outsourced (subcontracted) production. The procedure shall ensure that the materials and services procured conform to defined requirements where there is a potential impact to product safety, quality or legality.	Addition of defined performance criteria to factors influencing supplier approval to enable the site to determine what constitutes acceptable performance by its suppliers. Outsourced production is included as an addition to the suppliers of materials.
3.6.2	The procedures shall include clear criteria for the assessment and approval of new suppliers. Assessment may take the form of: • supplier certification with a scope covering the products supplied (e.g. against the appropriate BRC Global Standard, or other GFSI benchmarked scheme) • supplier questionnaires • supplier audits. The site shall have an up-to-date list of approved suppliers.	3.7.2	The approval procedure shall be based on risk and include either one or a combination of: • a valid certification to the applicable Global Standard or GFSI-benchmarked standard. The scope of the certification shall include the raw materials purchased, and the site shall validate any BRCGS certificates using the BRCGS Directory. • supplier audits, with a scope to include product safety, traceability, HARA review and good manufacturing practices, undertaken by an experienced and	This clause has been rewritten for consistency with Food Safety Issue 8, recognising not only BRCGS certificates (and how to validate them), but other GFSI schemes. Supplier questionnaires are permissible for initial approval where a risk assessment determines that they are appropriate.

Clause	Requirements	Clause	Requirements	
			demonstrably competent product safety auditor. Where the supplier audit is completed by a second or third party, the company shall be able to: – demonstrate the competency of the auditor – confirm that the scope of the audit includes product safety, traceability, HARA review and good manufacturing practices – obtain and review a copy of the full audit report **or** where a valid risk-based justification is provided, a satisfactorily completed supplier questionnaire may be used for initial approval. The questionnaire shall have a scope that includes product safety, traceability, HARA review and good manufacturing practices, and it shall have been reviewed and verified by a demonstrably competent person.	

Clause	Requirements	Clause	Requirements	
3.6.3	Records of supplier assessment and necessary actions shall be maintained and reviewed.	3.7.3	There shall be a documented process for ongoing supplier performance review, based on risk and defined performance criteria. The process shall be fully implemented. Where approval is based on questionnaires, these shall be reissued at agreed intervals based on risk, and suppliers shall be required to notify the site of any significant changes in the interim, including any change in certification status. Records of ongoing supplier assessment and any necessary actions shall be maintained and reviewed.	Ongoing supplier performance to be assessed on predetermined criteria. Questionnaires have limited validity.
		3.7.4	The site shall have an up-to-date list or database of approved suppliers. This may be on paper (hard copy) or it may be controlled on an electronic system. The list or relevant components of the database shall be readily available to the relevant staff.	Addition of an approved supplier list documented (hard copy or electronic) for ease of use and accessibility.
		3.7.5	The company shall ensure that its suppliers of raw materials have an effective traceability system. Where a supplier has been approved based on a questionnaire instead of certification or audit, verification of the supplier's traceability system shall be carried out on first approval and then at least every 3 years. This may be achieved by a traceability test.	Traceability systems of suppliers to be interrogated to ensure traceability can be assured back up the supply chain. The site itself doesn't need to audit the supplier if third-party certification is used.

Clause	Requirements	Clause	Requirements	
		3.7.6	Where raw materials are purchased from companies that are not the manufacturer or packer (e.g. purchased from an agent, broker or wholesaler), the site shall know the identity of the last manufacturer or packer. Information to enable the approval of the manufacturer or packer shall be obtained from the agent/broker or directly from the supplier, unless the agent/broker is certificated to the relevant Global Standard (e.g. Global Standard for Agents and Brokers) or a relevant standard benchmarked by GFSI.	New requirement around the use of agents and brokers in the supply chain, including knowledge by the site of where materials originate.
3.6.4	The procedures shall define how exceptions are handled; for example, the use of products or services where audit or monitoring has not been undertaken. Assessment (on a batch or delivery basis) may take the form of: • certificate of analysis • declaration of compliance.	3.7.7	The procedures shall define how exceptions are handled; for example, the use of products or services where an audit or monitoring has not been undertaken. Assessment (on a batch or delivery basis) may take the form of: • certificate of analysis • statement of compliance.	Change of word from 'declaration' to 'statement'.

3.8 Product authenticity, claims and chain of custody (new)

Issue 5		Issue 6		Comments
Statement of intent		Statement of intent		
		Systems shall be in place to minimise the risk of purchasing fraudulent raw materials for packaging and to ensure that all product descriptions and claims are legal, accurate and verified.		New
Clause	**Requirements**	**Clause**	**Requirements**	
		3.8.1	The company shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of substitution of raw materials (i.e. fraudulent raw materials). Such information may, for example, come from: • trade associations • government sources • private resource centres.	Site security and product defence have developed considerably; therefore a new clause has been developed to address this.
		3.8.2	A documented vulnerability assessment shall be carried out on all raw materials or groups of raw materials to assess the potential risk of substitution. This shall take into account: • historical evidence of substitution • economic factors which may make substitution more attractive • ease of access to raw materials through the supply chain • sophistication of routine and upstream testing to identify substitution • nature of the raw material. The output from this assessment shall be a documented vulnerability assessment plan.	New clause to assess the vulnerability of raw materials to product fraud, leading to the creation of a vulnerability assessment plan.

Clause	Requirements	Clause	Requirements	
			This plan shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risks. It shall be formally reviewed annually.	
		3.8.3	Where raw materials are identified as being at particular risk of substitution, the vulnerability assessment plan shall include appropriate assurance and/or testing processes to mitigate the identified risk(s).	New requirement about the substantiation of composition or other product claims.

3.7 Management of subcontracted processes (now 3.9 Management of subcontracted activities and outsourced processes)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Where any process steps in the manufacture of the packaging material are subcontracted to a third party or undertaken at another site, this shall be managed to ensure it does not compromise the quality, safety or legality of the product.		Where any process steps in the manufacture of the packaging material are outsourced to a third party, or the process is wholly subcontracted to another site, this shall be managed to ensure it does not compromise the quality, safety or legality of the product.		Scope of clause has been adjusted to include subcontracted activities and outsourced processes, with the same requirements for both.
Clause	**Requirements**	**Clause**	**Requirements**	
3.7.1	The use of subcontractors and the status of the subcontractor with respect to the Standard shall be notified to the brand owner and/or customer.	3.9.1	The company shall be able to demonstrate that, where any part of the production is outsourced and undertaken off-site, this has been declared to the customer or brand owner and, where required, approval has been granted.	Reworded as some customers don't always need to give approval for the use of subcontractors.

Clause	Requirements	Clause	Requirements	
3.7.2	Where any processes are subcontracted, including artwork or pre-press activity, the risks to the quality and safety of the product shall form part of the hazard and risk analysis and the company's evaluation of the system shall be held on record.	3.9.2	Where any processes are subcontracted or outsourced, including artwork or pre-press activity, the risks to the quality and safety of the product shall form part of the hazard and risk analysis and the company's evaluation of the system shall be held on record.	Addition of the word 'outsourced' to the requirement.
3.7.3	Clear specifications shall be agreed for all work outsourced to a subcontractor.	3.9.3	Clear specifications shall be agreed for all work outsourced or subcontracted.	Reworded for clarity.
3.7.4	Where any process steps in the manufacture of the packaging or packaging material are subcontracted, final release of the product shall remain the responsibility of the site. Controls shall be in place for checks on finished work to ensure product safety and quality meets specification prior to dispatch to the final customer.	3.9.4	Where any process steps in the manufacture of the packaging materials are subcontracted or outsourced, final release of the product shall remain the responsibility of the site. Controls shall be in place for checks on finished work to ensure product safety and quality meets specification prior to dispatch to the final customer.	Addition of the word 'outsourced' to the requirement.
		3.9.5	The company shall ensure that any subcontracted or outsourced processors have an effective traceability system. Where a supplier has been approved based on a questionnaire instead of certification or audit, verification of the supplier's traceability system shall be carried out on first approval and then at least once every 3 years. This may be achieved by a traceability test.	New requirement added around traceability through subcontracted or outsourced processes, supporting the traceability system of the site.

3.8 Management of suppliers of services (now 3.10)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company shall be able to demonstrate that where services are outsourced, the service is appropriate and any risks presented to product safety, quality or legality have been evaluated to ensure effective controls are in place.		The company shall be able to demonstrate that, where services are outsourced, any risks presented to product safety, quality or legality have been evaluated to ensure effective controls are in place.		Reworded.
Clause	**Requirements**	**Clause**	**Requirements**	
3.8.1	There shall be a documented procedure for the approval and monitoring of suppliers of services. Such services may include, but are not limited to: • pest control • laundry services • transport and distribution • storage and dispatch • sorting or rework • laboratory services • calibration services • waste management. Providers of utilities such as water, electricity or gas may be excluded on the basis of risk.	3.10.1	There shall be a documented procedure for the approval and monitoring of suppliers of services. Such services shall include, but are not limited to: • pest control • laundry services • transport and distribution • storage and dispatch • sorting or rework • laboratory services • calibration services • waste management • product safety and quality consultants to the site. Providers of utilities such as water, electricity or gas may be excluded on the basis of risk. This approval and monitoring process shall be risk-based and take into consideration: • risk to the safety and quality of products • compliance with any specific legal requirements • potential risks to the security of the product (i.e. risks identified in the vulnerability and product defence assessments).	'Shall' replaces 'may'. Inclusion of consultants to the site as service providers, requiring the site to verify that its consultants are subject to the same approval and monitoring procedures as other service suppliers. Additional points on approval and monitoring to be based on risk.

Clause	Requirements	Clause	Requirements	
3.8.2	Documented agreements shall exist with the suppliers of services which clearly define service expectations and ensure potential risks associated with the service have been addressed.	3.10.2	Contracts or formal agreements shall exist with the suppliers of services which clearly define service expectations and ensure potential risks associated with the service have been addressed.	Reworded for clarity.

3.9 Traceability (now 3.11)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The site shall be able to trace and follow all raw materials through processing to the distribution of the finished product (packaging material) to the customer and vice versa.		The site shall be able to trace and follow all raw materials through processing (including subcontracted processes) to the distribution of the finished product (packaging material) to the customer and vice versa.		Statement of intent for traceability now includes any subcontracted processes.
Clause	**Requirements**	**Clause**	**Requirements**	
3.9.1	The site shall have a system which has the ability to trace and follow all raw materials from the supplier through all stages of processing and distribution of the finished product and vice versa. Where continuous processes are used or raw materials are in bulk silos, traceability shall be achieved to the best practical level of accuracy.	3.11.1	The site shall have a documented traceability procedure and system that can trace and follow all raw materials from the supplier through all stages of processing (including subcontracted processes) and distribution of the finished product, and vice versa. Where continuous processes are used, or raw materials are in bulk silos, traceability shall be achieved to the best practical level of accuracy.	Updated requirement to document the site's traceability procedures.
3.9.2	Identification of raw materials, intermediate products, finished products, non-conforming product and quarantined goods shall be adequate to ensure traceability.	3.11.2	Identification of raw materials, intermediate products, finished products, non-conforming products and quarantined goods shall be adequate to ensure traceability.	

Clause	Requirements	Clause	Requirements	
3.9.3	An appropriate system shall be in place to ensure the customer can identify a product or production lot number for the product, for the purposes of traceability.	3.11.3	For traceability, an appropriate system shall be in place to ensure that the customer can identify a product or production lot number for the product. Where coding is applied, this shall be checked for legibility and accuracy against production records.	Addition of requirement to ensure coding is legible and accurate as it supports the traceability requirements.
3.9.4	The system shall be tested to ensure traceability can be determined from raw materials to the finished product and vice versa. Records shall be retrievable in a timely manner. This shall take place on a predetermined frequency, at least on an annual basis, and results retained for inspection.	3.11.4	The traceability procedure and system shall be tested at a predetermined frequency, at least annually, and the results shall be retained and easily retrieved for inspection. Traceability of all materials shall be achievable in a timely manner.	
3.9.5	Where rework or any reworking operation is performed, traceability shall be maintained.	3.11.5	Where rework or any reworking operation is performed or outsourced or subcontracted activities are carried out, traceability shall be maintained.	Inclusion of outsourced or subcontracted activities.
		3.11.6	Traceability of test data and samples to production lots shall be maintained.	New clause requiring site to ensure that test data is traceable to production lots.

3.10 Customer focus and contract review (removed)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company's senior management shall ensure that processes are in place to determine customer needs and expectations with regard to quality, safety and legality, and ensure these are fulfilled.				Removed for Issue 6 as this is dealt with in section 1 and in the relevant sections of the Standard.
Clause	**Requirements**	**Clause**	**Requirements**	
3.10.1	The company shall clearly identify those job titles responsible for communication with customers and shall have an effective system for communication.			Removed for Issue 6.
3.10.2	Customer needs and expectations shall be documented and reviewed on a suitable frequency. Any changes to existing agreements or contracts shall be agreed, documented and communicated to appropriate departments.			Removed for Issue 6.
3.10.3	Where customers have set particular performance criteria or indicators for monitoring, these requirements shall be communicated to relevant staff, adhered to, and reviewed at appropriate intervals.			Removed for Issue 6.

3.11 Complaint-handling (now 3.12)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Customer complaints relating to product hygiene, safety or quality shall be handled effectively and the information used to reduce complaint levels.		Customer complaints relating to product hygiene, safety or quality shall be handled effectively and the information used to reduce complaint levels.		
Clause	**Requirements**	**Clause**	**Requirements**	
3.11.1	All complaints shall be recorded and investigated (including root cause analysis) and the results of the investigation documented. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.	3.12.1	All complaints shall be recorded and investigated (including root cause analysis) and the results of the investigation documented. Actions appropriate to the seriousness and frequency of the problems identified shall be carried out promptly and effectively by appropriately trained staff.	
3.11.2	Complaint data shall be analysed to identify significant trends. Where there has been an increase or repetition of a complaint type, root cause analysis shall be used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff.	3.12.2	Complaint data shall be analysed to identify significant trends. Where there has been an increase or repetition of a complaint type, root cause analysis shall be used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff.	

3.12 Management of product withdrawals, and incidents and product recalls (now 3.13 Management of product withdrawals, incidents and product recalls)

Issue 5		Issue 6		
Statement of intent		**Statement of intent**		**Comments**
The site shall have a plan and systems in place to effectively manage any product withdrawals or returns from customers, incidents and product recalls in order to ensure that all potential risks to the hygiene, quality, safety or legality of products and the final consumer are controlled.		The site shall have a documented procedure and systems in place to effectively manage any product withdrawals, returns from customers, incidents or product recalls in order to ensure that all potential risks to the hygiene, quality, safety or legality of products and the final consumer are controlled.		Procedure is required to be documented.
Clause	**Requirements**	**Clause**	**Requirements**	
3.12.1	A product withdrawal procedure shall be documented and shall include as a minimum: • identification of the key personnel involved in assessing potential product withdrawals or returns, with their responsibilities clearly defined • a communications plan including methods of informing customers • root cause analysis and corrective action to implement appropriate improvements as required.	3.13.1	A product withdrawal procedure shall be documented and include as a minimum: • identification of the key personnel involved in assessing potential product withdrawals or returns, with their responsibilities clearly defined • a communications plan including methods of informing customers • root cause analysis and corrective action to implement appropriate improvements as required.	
3.12.2	The withdrawal procedure shall be capable of being operated at any time and will take into account notification to the supply chain, stock return, logistics for recovery, storage of recovered product and disposal.	3.13.2	The withdrawal procedure shall be capable of being operated at any time and will take into account notification to the supply chain, stock return, logistics for recovery, storage of recovered product, and disposal.	
3.12.3	The designated manager shall be responsible for ensuring that root cause analysis is used to determine and implement preventive action and improvements as necessary.			Moved to section 3.6.

Clause	Requirements	Clause	Requirements	
3.12.4	The company shall provide written guidance and training for relevant staff regarding the type of event that would constitute an incident. A documented incident reporting procedure shall be in place.	3.13.3	The company shall provide written guidance and training for relevant staff regarding the type of event that would constitute an incident. Incidents may include: • disruption to normal production processes • disruption to key services such as water, energy, transport, refrigeration processes, staff availability and communications • events such as fire, flood or natural disaster • malicious contamination or sabotage • failure of, or attacks against, digital cyber-security. Where products which have been released from the site could be affected by an incident, the need to withdraw products and, where appropriate, advise customers to withdraw and/or recall products shall be considered. A documented incident reporting procedure shall be in place.	Inclusion of types of incident.
3.12.5	The company shall determine and document the activity required to effectively manage an incident to prevent release of product where hygiene, safety or quality may have been affected.	3.13.4	The company shall determine and document the activity required to effectively manage an incident to prevent release of product where hygiene, safety or quality may have been affected.	

Clause	Requirements	Clause	Requirements	
3.12.6	A procedure to manage product recalls initiated by the brand owner or specifier shall be documented and shall include as a minimum: • identification of the key personnel involved in assessing potential recalls, together with clearly defined responsibilities • a communications plan that includes methods of informing customers and (where necessary) regulatory bodies in a timely manner • corrective action and business recovery • review of any recalls in order to conduct root cause analysis and implement appropriate improvements as required.	3.13.5	A procedure to manage product recalls initiated by the brand owner or specifier shall be documented and include as a minimum: • identification of the key personnel involved in assessing potential recalls, together with clearly defined responsibilities • a communications plan that includes methods of informing customers and (where necessary) regulatory bodies in a timely manner.	Last two bullet points removed as addressed elsewhere.
3.12.7	Where a site's products are involved in a product recall, the site shall assist with provision of information (such as traceability) as required.	3.13.6	Where a site's products are involved in a product recall, the site shall assist with provision of information (such as traceability) as required.	
3.12.8	The product withdrawal procedure shall be tested, at least annually, in a way that ensures its effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test, and of any actual withdrawals, shall be used to review the procedure and implement improvements as necessary.	3.13.7	The product withdrawal procedure shall be tested, at least annually, in a way that ensures its effective operation. Results of the test shall be retained and shall include timings of key activities. The results of the test, and of any actual withdrawals, shall be used to review the procedure and implement improvements as necessary.	

4 Site standards

4.1 External standards

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The site shall be of suitable size and construction, in a suitable location, and maintained to an appropriate standard to reduce the risk of contamination and facilitate the production of safe and legal products.		The site shall be of suitable size and construction, in a suitable location, and maintained to an appropriate standard to reduce the risk of contamination and facilitate the production of safe and legal products.		
Clause	**Requirements**	**Clause**	**Requirements**	
4.1.1	Consideration shall be given to local activities and the site environment, which may have an adverse impact on the safety or quality of the finished product or raw materials, and measures shall be taken to prevent contamination. Where measures have been put in place to protect the site, they shall be regularly reviewed to ensure they continue to be effective (e.g. flood controls).	4.1.1	Consideration shall be given to local activities and the site environment, which may have an adverse impact on the safety or quality of the finished product or raw materials, and measures shall be taken to prevent contamination. Where measures have been put in place to protect the site, they shall be regularly reviewed to ensure they continue to be effective (e.g. flood controls).	
4.1.2	The external areas shall be maintained in good order. Any grassed or planted areas surrounding buildings shall be regularly tended and well maintained. External traffic routes under site control shall be suitably surfaced to avoid contamination of the product.	4.1.2	The external areas shall be maintained in good order. Any grassed or planted areas surrounding buildings shall be regularly tended and well maintained. External traffic routes under site control shall be suitably surfaced to avoid contamination of the product.	

Clause	Requirements	Clause	Requirements	
4.1.3	The building fabric shall be maintained to minimise potential for pest entry, ingress of water and other contaminants. External silos, pipework or other access points for the product and/or raw materials shall be appropriately sealed and secured. Where possible, a clean and unobstructed area shall be provided along the external walls of the buildings used for production and/or storage.	4.1.3	The building fabric shall be maintained to minimise potential for pest entry, ingress of water and other contaminants. External silos, pipework or other access points for the product and/or raw materials shall be appropriately sealed and secured. Where possible, a clean and unobstructed area shall be provided along the external walls of the buildings used for production and/or storage.	
4.1.4	Where natural external drainage is inadequate, additional drainage shall be installed. Drains shall be properly protected to prevent entry of pests.	4.1.4	Where natural external drainage is inadequate, additional drainage shall be installed. Drains shall be properly protected to prevent entry of pests.	
4.1.5	Where external storage of raw materials is necessary, these shall be protected in order to minimise the risk of contamination.	4.1.5	Where external storage of raw materials is necessary, these shall be protected in order to minimise the risk of contamination.	

4.2 Building fabric and interiors: raw materials handling, preparation, processing, packing and storage areas

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The internal site, buildings and facilities shall be suitable for the intended purpose and shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.		The internal site, buildings and facilities shall be suitable for the intended purpose and shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.		
Clause	**Requirements**	**Clause**	**Requirements**	
4.2.1	Walls, floors, ceilings and pipework shall be maintained in good condition and shall facilitate cleaning.	4.2.1	Walls, floors, ceilings and pipework shall be maintained in good condition and shall facilitate cleaning.	
4.2.2	Where suspended ceilings exist they shall be constructed, finished and maintained to prevent the risk of product contamination, and accessible for cleaning and inspection for pests unless the void is fully sealed.	4.2.2	Where suspended ceilings exist, they shall be constructed, finished and maintained to prevent the risk of product contamination, and accessible for cleaning and inspection for pests unless the void is fully sealed.	
4.2.3	All internal drain openings shall be suitably protected against the entry of pests and designed to minimise odour.	4.2.3	All internal drain openings shall be suitably protected against the entry of pests and designed to minimise odour.	
4.2.4	Where they constitute a risk to product, and based on the likelihood and risk of contamination, windows and roof glazing shall be protected against breakage.	4.2.4	Where they constitute a risk to product, and based on the likelihood and risk of contamination, windows and roof glazing shall be protected against breakage.	
4.2.5	Where they constitute a risk to product, and based on the likelihood and risk of non-production glass contamination, all bulbs and strip lights, including those on flying-insect control devices, shall be adequately protected.	4.2.5	Where they constitute a risk to product, and based on the likelihood and risk of non-production glass contamination, all bulbs and strip lights, including those on flying-insect control devices, shall be adequately protected.	

Clause	Requirements	Clause	Requirements	
		4.2.6	Where elevated walkways are adjacent to or pass over production lines, based on risk they shall be: • designed to prevent contamination of products and production lines • easy to clean • correctly maintained.	New requirement around elevated walkways that pass over production lines.
4.2.6	Suitable and sufficient lighting shall be provided to ensure a safe working environment, correct operation of processes, effective inspection of the product and cleaning.	4.2.7	Suitable and sufficient lighting shall be provided to ensure a safe working environment, correct operation of processes, effective inspection of the product and cleaning.	
4.2.7	Suitable and sufficient ventilation shall be provided.	4.2.8	Suitable and sufficient ventilation shall be provided.	

4.3 Utilities

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
All utilities to and within the production and storage areas shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.		All utilities to and within the production and storage areas shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.		
Clause	**Requirements**	**Clause**	**Requirements**	
4.3.1	All water used in the processing of the products or equipment cleaning shall be potable or suitably treated to prevent contamination.	4.3.1	All water used in the processing of the products or equipment cleaning shall be potable or suitably treated to prevent contamination.	
4.3.2	Based on risk assessment, the microbiological and chemical quality of water, steam, ice, air, compressed air or other gases which come into direct contact with packaging shall be regularly monitored. These shall present no risk to product safety or quality and shall comply with relevant legal regulations.	4.3.2	Based on risk assessment, the microbiological and chemical quality of water, steam, ice, air, compressed air or other gases which come into direct contact with packaging shall be regularly monitored. These shall present no risk to product safety or quality and shall comply with relevant legal regulations.	

4.4 Security (now Site security and product defence)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Security arrangements shall be assessed to ensure the integrity of products and processes.		A product defence plan shall be in place to ensure that there are systems to protect products, premises and brands from malicious actions while under the control of the site.		Title includes product defence, a GFSI-based requirement to assess threat from malicious intent.
Clause	**Requirements**	**Clause**	**Requirements**	
4.4.1	The company shall undertake a documented risk assessment of the security arrangements and potential risks to the products from any deliberate attempt to inflict contamination or damage. Areas shall be assessed according to risk; sensitive or restricted areas shall be defined, clearly marked, monitored and controlled. Identified security arrangements to reduce risks shall be documented, implemented and reviewed at least annually.	4.4.1	The company shall undertake a documented risk assessment (threat assessment) of the security arrangements and potential risks to the products from any deliberate attempt to inflict contamination or damage. This threat assessment shall include both internal and external threats. The output from this assessment shall be a documented product defence plan. Areas shall be assessed according to risk; sensitive or restricted areas shall be defined, clearly marked, monitored and controlled. This plan shall be kept under review to reflect changing circumstances and external influences. It shall be formally reviewed at least annually.	Introduction of the term 'threat assessment', requiring the site to consider internal and external threats to its products by forming a product defence plan. The plan should be kept under review.

Clause	Requirements	Clause	Requirements	
4.4.2	Measures shall be in place to ensure only authorised personnel have access to production and storage areas, and access to the site by employees, contractors and visitors shall be controlled. A visitor reporting system shall be in place. Staff shall be trained in site security procedures and encouraged to report unidentified or unknown visitors.	4.4.2	Measures shall be in place to ensure only authorised personnel have access to production and storage areas, and access to the site by employees, contractors and visitors shall be controlled. A visitor reporting system shall be in place. Staff shall be trained in site security procedures and encouraged to report unidentified or unknown visitors.	
4.4.3	External storage tanks, silos and any intake pipes with an external opening shall be sufficiently secure to prevent unauthorised access.	4.4.3	External storage tanks, silos and any intake pipes with an external opening shall be sufficiently secure to prevent unauthorised access.	

4.5 Layout and product flow (now Layout, product flow and segregation)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The factory layout, flow of processes and movement of personnel shall be sufficient to prevent the risk of product contamination and to comply with all relevant legislation.		The factory layout, flow of processes and movement of personnel shall be sufficient to prevent the risk of product contamination and to comply with all relevant legislation.		
Clause	**Requirements**	**Clause**	**Requirements**	
4.5.1	There shall be a plan of the site which defines: • access points for personnel • travel routes • staff facilities • process flow • storage areas.	4.5.1	There shall be a current map or plan of the site which defines: • access points for personnel • travel routes for personnel, raw materials and intermediate or finished products • staff facilities • routes for the removal of waste • production and process flows • storage areas.	A map or a plan is acceptable for this clause with additional bullet points outlining what should be in it.

Clause	Requirements	Clause	Requirements	
4.5.2	The process flow from intake to dispatch shall be arranged to minimise the risk of contamination or damage to the product.	4.5.2	The process flow from intake to dispatch shall be arranged to minimise the risk of contamination or damage to the product.	
4.5.3	Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly under safe and hygienic conditions.	4.5.3	Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly under safe and hygienic conditions.	
4.5.4	Sorting or other activities involving the direct handling of the product shall take place in areas that have, as a minimum, the same standards as production areas.	4.5.4	Sorting or other activities involving the direct handling of the product shall take place in areas that have, as a minimum, the same standards as production areas.	
4.5.5	Activities that could produce a contamination risk, such as the removal of outer packaging, shall be carried out in a designated, segregated area.	4.5.5	Activities that could produce a contamination risk, such as the removal of outer packaging, shall be carried out in a designated, segregated area.	
4.5.6	If it is necessary to allow access through production areas, designated walkways shall be provided that ensure there is adequate segregation from materials.	4.5.6	If it is necessary to allow access through production areas, designated walkways shall be provided that ensure there is adequate segregation from materials.	
4.5.7	Where possible, all facilities shall be designed and positioned so that movement of personnel is by simple, logical routes.	4.5.7	Where possible, all facilities shall be designed and positioned so that movement of personnel is by simple, logical routes.	

4.6 Equipment

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Equipment shall be suitably designed for the intended purpose and shall be maintained and used so as to minimise the risk to product safety, legality and quality.		Equipment shall be suitably designed for the intended purpose and shall be maintained and used so as to minimise the risk to product safety, legality and quality.		
Clause	**Requirements**	**Clause**	**Requirements**	
4.6.1	Equipment shall be designed for the intended purpose and shall minimise the risk of contamination to the product. Equipment shall be constructed of suitable materials and be designed to ensure it can be effectively cleaned and maintained.	4.6.1	Production, storage and warehousing equipment shall be designed for the intended purpose and shall minimise the risk of contamination to the product. Lubrication points and application methods of any lubricant shall not be able to contaminate the product. Equipment shall be constructed of suitable materials and be designed to ensure it can be effectively cleaned and maintained.	Types of equipment are listed, with a specific mention to prevent the act of lubrication from forming a contamination hazard.
4.6.2	Newly installed equipment shall be properly specified before purchase. New equipment shall be tested and commissioned prior to use and a maintenance and cleaning programme established.	4.6.2	Newly installed equipment shall be properly specified before purchase. New equipment shall be tested and commissioned prior to use and a maintenance and cleaning programme established.	
4.6.3	Wooden equipment including desks, chairs, tables, etc. shall be properly sealed to enable effective cleaning. This equipment shall be kept clean, in good condition and free from splinters or other sources of physical contamination.	4.6.3	Wooden equipment including desks, chairs, tables, etc. shall be properly sealed to enable effective cleaning. This equipment shall be kept clean, in good condition and free from splinters or other sources of physical contamination.	
4.6.4	Notices on equipment shall be cleanable and secure.	4.6.4	Notices on equipment shall be cleanable and secure.	

4.7 Maintenance

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns.		An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns.		
Clause	**Requirements**	**Clause**	**Requirements**	
4.7.1	A documented programme of maintenance shall be operated, covering all items of production equipment and plant, to prevent contamination and reduce the risk of breakdown.	4.7.1	A documented programme of maintenance shall be operated, covering all items of production equipment and plant critical to product safety, legality and quality, to prevent contamination and reduce the risk of breakdown.	
4.7.2	A condition-based or preventive maintenance programme shall be in place, covering all items of equipment and plant that are critical to product safety, legality and quality.	4.7.2	Maintenance logs shall be maintained for all off-line testing equipment. This shall include, as a minimum: • any adjustments • the re-calibration date of any interventions.	New requirement for maintenance logs.
4.7.3	In addition to any planned maintenance programme, where there is a risk of product contamination by foreign bodies arising from equipment failure or damage, the equipment shall be inspected at predetermined intervals, inspection results documented and appropriate action taken.	4.7.3	In addition to any planned maintenance programme, where there is a risk of product contamination by foreign bodies arising from equipment failure or damage, the equipment shall be inspected at predetermined intervals, inspection results documented, and appropriate action taken.	
4.7.4	Maintenance work shall not place product safety, quality or legality at risk. Maintenance work shall be followed by a documented clearance procedure which records that contamination hazards have been removed and equipment cleared to resume production.	4.7.4	Maintenance work shall not place product safety, quality or legality at risk. Maintenance work shall be followed by a documented clearance procedure which records that contamination hazards have been removed and equipment cleared to resume production.	

Clause	Requirements	Clause	Requirements	
4.7.5	Tools and other maintenance equipment shall be cleared away after use and appropriately stored.	4.7.5	Tools and other maintenance equipment shall be cleared away after use and appropriately stored.	
4.7.6	Temporary repairs/ modifications using tape, cardboard, etc., shall only be permitted in emergencies and where product contamination is not at risk. Such modifications shall be subject to a time limit and shall be recorded and scheduled for correction.	4.7.6	Temporary repairs/ modifications using tape, cardboard, etc. shall only be permitted in emergencies and where product contamination is not at risk. Such modifications shall be subject to a time limit and shall be recorded and scheduled for correction.	
4.7.7	Engineering workshops shall be controlled to prevent transfer of engineering debris to production or storage areas (e.g. by provision of swarf mats).	4.7.7	Engineering workshops shall be controlled to prevent transfer of engineering debris to production or storage areas (e.g. by provision of swarf mats).	
4.7.8	Contractors involved in maintenance or repair shall be suitably monitored by a staff member who shall be responsible for their activities.	4.7.8	Contractors involved in maintenance or repair shall be suitably monitored by a staff member who shall be responsible for their activities.	

4.8 Housekeeping and cleaning

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Housekeeping and cleaning systems shall be in place which ensure that appropriate standards of hygiene are maintained and that risk of contamination to the product is minimised.		Housekeeping and cleaning systems shall be in place which ensure that appropriate standards of hygiene are maintained and that the risk of product contamination is minimised.		Reworded for clarity.
Clause	**Requirements**	**Clause**	**Requirements**	
4.8.1	Good standards of housekeeping shall be maintained, which shall include a 'clean as you go' policy.	4.8.1	Good standards of housekeeping shall be maintained, which shall include a condition-based cleaning or 'clean as you go' policy.	Reworded requirement outlining conditions in production and storage areas. 'Clean as you go' can also be termed as 'condition-based'.

Clause	Requirements	Clause	Requirements	
4.8.2	Documented cleaning procedures shall be in place and maintained for buildings, equipment and vehicles. The frequency and methods of cleaning shall be based on risk. Cleaning schedules and procedures shall include the following information: • responsibility for cleaning • item/area to be cleaned • frequency of cleaning • method of cleaning • cleaning materials to be used • cleaning record and responsibility for verification.	4.8.2	Documented cleaning procedures shall be in place and maintained for buildings, equipment and vehicles. Cleaning schedules and procedures shall include the following information: • responsibility for cleaning • item/area to be cleaned • frequency of cleaning • method of cleaning • cleaning materials to be used • cleaning record and responsibility for verification. The frequency and methods of cleaning shall be based on risk. The procedures shall be implemented to ensure that appropriate standards of cleaning are achieved.	Detail added around the implementation of procedures.
4.8.3	Cleaning chemicals shall be fit for purpose, suitably labelled, and used in accordance with manufacturers' instructions. They shall be stored in a secured, designated location, in closed containers. Chemicals that are strongly scented or could give rise to taint and odour contamination shall not be used. Cleaning equipment shall be kept in a suitable designated location.	4.8.3	Cleaning chemicals shall be fit for purpose, suitably labelled, and used in accordance with manufacturers' instructions. They shall be stored in a secured, designated location, in closed containers. Chemicals that are strongly scented or could give rise to taint and odour contamination shall not be used. Cleaning equipment shall be kept in a suitable designated location.	
4.8.4	Materials and equipment used for cleaning toilets shall be segregated from those used elsewhere.	4.8.4	Materials and equipment used for cleaning toilets shall be differentiated from those used elsewhere, and physically segregated where necessary.	Detail added around the management of materials for cleaning toilets.

Clause	Requirements	Clause	Requirements	
		4.8.5	Where appropriate, based on risk, a microbiological environmental monitoring programme shall be in place to ensure that the cleaning operations are effective in minimising the risk of contamination by microorganisms that would be detrimental to the products. The programme shall consider the likelihood of the microorganisms' survival on packaging materials and their use. Where a programme is in place, this shall include: • sampling protocol • identification of sample locations • frequency of tests • target organisms (e.g. pathogens, spoilage organisms and/or indicator organisms) • test methods • recording and evaluation of results. The programme and its associated procedures shall be documented.	New clause for the addition of a microbiological environmental monitoring programme, to minimise the risk of contamination. A position statement has been published for Issue 5 (P558). It is effective until 31 January 2020 when Issue 6 goes live.

4.9 Product contamination control

Issue 5	Issue 6	Comments
Statement of intent	**Statement of intent**	
All practicable steps shall be taken to identify, eliminate, avoid or minimise the risk of foreign body or chemical contamination.	All practicable steps shall be taken to identify, eliminate, avoid or minimise the risk of foreign-body or chemical contamination.	

4.9.1 Glass, brittle plastics, ceramics and similar materials control

Issue 5		Issue 6		Comments
Clause	**Requirements**	**Clause**	**Requirements**	
4.9.1.1	There shall be no unnecessary non-production glass, ceramics or brittle plastic, which may pose a risk of contamination.	4.9.1.1	There shall be no unnecessary non-production glass, ceramics or brittle plastic present, which may pose a foreseeable risk of contamination. Where non-production glass, ceramics or brittle plastics are required in production, packing or storage areas, and where there is a risk of product contamination, procedures for their handling shall be in place.	'Foreseeable' added to the risk of contamination by glass, brittle plastics etc. in production areas. Handling procedures are also required.
4.9.1.2	All glass or brittle plastics other than the product shall be controlled and recorded on a register which shall include as a minimum: • a list of items detailing location, number, type and condition • recorded checks of condition of items, carried out at a specified frequency that is based on the level of risk to the product • details on cleaning or replacing items to minimise potential for product contamination.	4.9.1.2	Glass or brittle plastics (other than the product) that pose a potential product contamination hazard shall be controlled and recorded on a register that includes, as a minimum: • a list of items detailing location, number, type and condition • recorded checks of condition of items, carried out at a specified frequency that is based on the level of risk to the product • details on cleaning or replacing items to minimise the potential for product contamination.	'Potential product contamination hazard' is key to this clause, as sites are not required to list every item if they are not deemed to be a hazard.

Clause	Requirements	Clause	Requirements	
	Glass or brittle plastics not in the production or storage areas shall be included in the register on the basis of risk.		Glass or brittle plastics not in the production or storage areas shall be included in the register on the basis of risk.	
4.9.1.3	Where non-production glass or brittle plastic breakage occurs, a responsible person shall be placed in charge of the clean-up operation and shall ensure that no other area is allowed to become contaminated due to the breakage. Any product that has become contaminated shall be segregated and disposed of. All breakages shall be recorded in an incident report.	4.9.1.3	Where non-production glass or brittle plastic breakage occurs, a responsible person shall be placed in charge of the clean-up operation and shall ensure that no other area is allowed to become contaminated due to the breakage. Any product that has become contaminated shall be segregated and disposed of. All breakages shall be recorded in an incident report.	

4.9.2 Sharps control (now Sharps and metal control)

Issue 5		Issue 6		Comments
Clause	Requirements	Clause	Requirements	
4.9.2.1	There shall be a documented policy for the control of the use of sharps.	4.9.2.1	There shall be a documented policy for the controlled use and storage of sharp implements, including knives, needles and wires, to prevent contamination. The policy shall include control of these items into and out of the site.	Added detail on the policy for sharps control.
4.9.2.2	Sharp blades, equipment and tools shall not be left in a position that allows them to contaminate the product.	4.9.2.2	Production equipment that incorporates blades or sharps shall be monitored. Blades or other sharp implements shall not be allowed to contaminate the product.	Focus on production equipment that incorporates blades and sharps (such as cutting machines).
4.9.2.3	Sharp cutting instruments used in the manufacture of packaging materials shall be controlled to prevent product contamination. This shall include control into and out of the factory.			Removed as included in clause 4.9.2.1.

Clause	Requirements	Clause	Requirements	
4.9.2.4	Snap-off blade knives shall not be used.	4.9.2.3	Snap-off blade knives shall not be used.	
4.9.2.5	Where open noticeboards are present in production, packing and storage areas, loose fastenings, such as drawing pins and staples, shall not be used.	4.9.2.4	Where open noticeboards are present in production, packing and storage areas, loose fastenings, such as drawing pins and staples, shall not be used.	

4.9.3 Chemical and biological control

Issue 5		Issue 6		Comments
Clause	Requirements	Clause	Requirements	
4.9.3.1	Processes shall be in place to manage the use, storage and handling of non-production chemicals, to prevent chemical contamination. These shall include as a minimum: • a list of approved chemicals for purchase • availability of material safety data sheets and specifications • avoidance of strongly scented products • the labelling and/or identification of containers of chemicals at all times • designated storage area with access restricted to authorised personnel • use by trained personnel only.	4.9.3.1	Processes shall be in place to manage the use, storage and handling of non-production chemicals, to prevent chemical contamination. These shall include, as a minimum: • a list of approved chemicals for purchase • availability of material safety data sheets and specifications • avoidance of strongly scented products • the labelling and/or identification of containers of chemicals at all times • designated storage area with access restricted to authorised personnel • use by trained personnel only.	
4.9.3.2	Hazard and risk analysis shall be used to identify, control and manage any potential risks from microbiological contamination and any potential allergens.	4.9.3.2	Hazard and risk analysis shall be used to identify, control and manage any potential risks from microbiological contamination and any potential allergens.	

4.10 Waste and waste disposal

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Suitable facilities shall be provided for the storage and disposal of process and other waste.		Waste disposal shall be managed in accordance with legal requirements and to prevent accumulation, risk of contamination and the attraction of pests.		Reworded for clarity.
Clause	**Requirements**	**Clause**	**Requirements**	
4.10.1	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.	4.10.1	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.	
		4.10.2	Process waste shall be managed to minimise release to the environment. This shall include, but is not limited to, pellet, flake, powder, dust and offcuts.	New requirement surrounding the management of process waste, including unprocessed pellet, flake, powder, dust and offcuts.
4.10.2	Suitable and sufficient refuse and waste containers shall be provided, which shall be emptied at appropriate frequencies and maintained in an adequately clean condition.	4.10.3	Suitable and sufficient refuse and waste containers shall be provided, which shall be emptied at appropriate frequencies and maintained in an adequately clean condition.	
4.10.3	Where appropriate, waste shall be categorised according to legislative requirements based on the intended means of disposal (such as recycling), and sorted, segregated and collected in appropriate designated waste containers.	4.10.4	Where appropriate, waste shall be categorised according to legislative requirements based on the intended means of disposal (such as recycling), and sorted, segregated and collected in appropriate designated waste containers.	
4.10.4	Substandard trademarked materials shall be rendered unusable through a destructive process. All materials disposed of shall be recorded.	4.10.5	Substandard trademarked materials shall be rendered unusable through a destructive process. All materials disposed of shall be recorded.	

Clause	Requirements	Clause	Requirements	
4.10.5	If substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be a specialist in appropriate waste disposal and shall provide records of material destruction.	4.10.6	If substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be a specialist in appropriate waste disposal and shall provide records of material destruction.	
4.10.6	External storage of refuse shall be in designated areas and designed or maintained to minimise the risk of pest harbourage.	4.10.7	External storage of refuse shall be in designated areas and designed or maintained to minimise the risk of pest harbourage.	

4.11 Pest control (now Pest management)

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
In order to minimise the risk of infestation and prevent risk to products, the whole site shall have an effective preventive pest control programme in place and the resources available to respond immediately to any issues which occur.		In order to minimise the risk of infestation and risk to products, the whole site shall have an effective preventive pest management programme in place and the resources available to respond immediately to any issues which occur.		Change from 'pest control' to 'pest management' to keep up to date with current terminology.
Clause	**Requirements**	**Clause**	**Requirements**	
4.11.1	A preventive pest control programme shall be maintained, covering all areas of the site under the site's control.	4.11.1	A preventive pest management programme shall be maintained, covering all areas of the site under the site's control. The site shall assess the suitability of its pest management programme to address variation in pest activity through different seasons, and consider any additional preventive activity required. The site shall document and implement any required additional activity.	The site should consider seasonable variability in the effectiveness of its pest management programme.

Clause	Requirements	Clause	Requirements	
4.11.2	The site shall either contract the services of a competent pest control organisation or shall have appropriately trained staff for the regular inspection and treatment of the site in order to deter and eradicate infestation. The frequency of inspections shall be determined by risk assessment and shall be documented. Where the services of a pest control contractor are employed, the service contract shall be clearly defined and reflect the activities of the site.	4.11.2	The site shall either contract the services of a competent pest management organisation or have appropriately trained staff for the regular inspection and treatment of the site in order to deter and eradicate infestation. The frequency of inspections shall be determined by risk assessment and documented. The risk assessment shall be reviewed whenever: • there are changes to the building or production processes which could have an impact on the pest management programme • there has been a significant pest issue. Where the services of a pest management contractor are employed, the service contract shall be clearly defined and reflect the activities of the site.	Clause to establish when the pest management risk assessment should take place.
4.11.3	Where a site undertakes its own pest control, it shall be able to demonstrate that: • pest control operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the biology of the pests associated with the site • staff undertaking pest control activities meet any legal requirements for training or registration	4.11.3	Where a site undertakes its own pest management, it shall be able to demonstrate that: • pest management operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the biology of the pests associated with the site • staff undertaking pest management activities meet any legal requirements for training or registration	Clause reworded.

Clause	Requirements	Clause	Requirements	
	• sufficient resources are available to respond to any infestation issues • there is ready access to specialist technical knowledge when required • legislation governing the use of pest control products is understood • dedicated locked facilities are used for the storage of pesticides.		• sufficient resources are available to respond to any infestation issues • there is ready access to specialist technical knowledge when required • legislation governing the use of pest control products is understood and complied with • dedicated locked facilities are used for the storage of pesticides.	
4.11.4	Pest control equipment such as bait stations, traps or electric fly-killing devices shall be appropriately located and operational.	4.11.4	Equipment such as bait stations, traps or electric fly-killing devices shall be appropriately located and operational.	
4.11.5	Effective precautions shall be in place to prevent pests entering the premises. The building shall be suitably proofed against the entry of all pests via doors, windows, ducts and cable entry points.	4.11.5	Effective precautions shall be in place to prevent pests entering the premises. The building shall be suitably proofed against the entry of all pests via doors, windows, ducts and cable entry points. This shall include measures to prevent birds and flying mammals from entering buildings or roosting above loading or unloading areas.	Addition of requirement to prevent flying mammals or birds being attracted to loading or unloading areas.
4.11.6	In the event of infestation, immediate action shall be taken to eliminate the hazard. Action shall be taken to identify, evaluate the potential for contamination or damage, and authorise the release of any product potentially affected.	4.11.6	In the event of infestation, immediate action shall be taken to eliminate the hazard. Action shall be taken to identify, evaluate the potential for contamination or damage, and authorise the release of any product potentially affected.	
4.11.7	In the event of an infestation, and at appropriate intervals, the site shall request a catch analysis from flying-insect control devices to help identify problem areas.	4.11.7	In the event of an infestation, and at appropriate intervals, the site shall request a catch analysis from flying-insect control devices to help identify problem areas.	

Clause	Requirements	Clause	Requirements	
	In the event of increase in activity, the site shall use risk assessment to determine the activity required to eliminate the hazard.		In the event of increase in activity, the site shall use risk assessment to determine the activity required to eliminate the hazard.	
4.11.8	Documented procedures and detailed records of pest activity, pest control inspections and recommendations shall be maintained. These shall include as a minimum: • an up-to-date, signed and authorised site plan identifying numbered pest control device locations • identification of the baits and/or monitoring devices on site • clearly defined responsibilities for site management and the contractor • details of pest control products used and instructions for their effective use • detailed records of pest control inspections, recommendations and of any pest infestation. It shall be the responsibility of the site to ensure that all the relevant recommendations made by the contractor or in-house expert are implemented in a timely manner and monitored for efficacy.	4.11.8	Documented procedures and detailed records of pest activity, pest management inspections and recommendations shall be maintained. These shall include, as a minimum: • an up-to-date, signed and authorised site plan identifying numbered pest control devices and their locations • identification of the baits and/or monitoring devices on site • clearly defined responsibilities for the site management and the contractor • details of pest control products used and instructions for their effective use • detailed records of inspections, recommendations and of any pest infestation. It shall be the responsibility of the site to ensure that all the relevant recommendations made by the contractor or in-house expert are implemented in a timely manner and monitored for efficacy.	Addition of detail for clarity.
4.11.9	Employees shall understand the signs of pest activity and be aware of the need to report any evidence to a designated manager.	4.11.9	Employees shall understand the signs of pest activity and be aware of the need to report any evidence to a designated manager.	

5 Product and process control

5.1 Product development

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Documented product development or modification procedures shall be in place to ensure the production of safe and legal products to defined quality parameters.		Documented product development or modification procedures shall be in place to ensure the production of safe and legal products to defined quality parameters.		
Clause	**Requirements**	**Clause**	**Requirements**	
5.1.1	Customer requirements relating to the design, development, specification, manufacture and distribution of the product shall be documented and agreed with the customer. This shall take into consideration process requirements and end use, where possible. Any critical-use parameters shall be identified and defined; for example, barrier requirements, max/min use temperature, machine running, use of recycled materials, and testing requirements (including migration, where relevant). Special attention shall be paid to any materials that are required or requested to be manufactured from recycled materials, to ensure that they are both appropriate and legal.	5.1.1	Customer requirements relating to the design, development, specification, manufacture and distribution of the product shall be documented and agreed with the customer. This shall take into consideration process requirements and end use, where possible. Any critical-use parameters shall be identified and defined; for example, barrier requirements, maximum/minimum use temperature, machine running, use of recycled materials, and testing requirements (including migration, where relevant). Special attention shall be paid to any materials that are required or requested to be manufactured from recycled materials, to ensure that they are both appropriate and legal.	

Clause	Requirements	Clause	Requirements	
5.1.2	The site shall clearly define and document when a production trial is required. Where appropriate, production trials shall be carried out and testing shall validate that manufacturing processes are capable of producing a safe and legal product to the required quality.	5.1.2	The site shall clearly define and document when a production trial is required. The site shall determine the outputs and success criteria required from a production trial, and any changes and/or additions made to materials, processing characteristics or equipment as a result of the trial. Where appropriate, production trials shall be carried out and testing shall validate that manufacturing processes are capable of producing a safe and legal product to defined quality parameters. New products or product changes shall be subject to suitable evaluation to ensure that required safety and quality parameters can be achieved.	More detail about the role of a production trial, its outputs, and defined quality parameters.
5.1.3	The company shall ensure that production is carried out using defined operating conditions that result in safe and legal products of the prescribed quality.	5.1.3	The company shall ensure that production is carried out using defined operating conditions which result in safe and legal products to defined quality parameters.	
5.1.4	A technical product specification shall be prepared and, where possible, agreed with the customer or brand owner before the production process begins.	5.1.4	Where required by the customer, a technical product specification shall be prepared and, where possible, agreed with the customer or brand owner before the production process begins.	Addition of detail recognising that the customer doesn't always require a specification, particularly if they are internal.
5.1.5	Samples as agreed with the specifier shall be retained for future reference.	5.1.5	Samples as agreed with the specifier shall be retained for future reference.	

Clause	Requirements	Clause	Requirements	
		5.1.6	A documented procedure shall in be in place to address the transfer of customer specifications or requirements to the site's own systems. This shall include (but is not limited to): • validation of accuracy of data transferred • how changes to customer specifications are updated and communicated • how the agreed requirements for customer testing methods are met • evaluation of how changes made to the customer specifications affect the technical product specification (see clause 5.1.1). Settings derived from successfully conducted production trials or equipment installations shall be transferred accurately to process control documentation.	New requirement to ensure that where data is transferred from one source to another, steps are in place to ensure that the integrity of the data is maintained.

5.2 Graphic design and artwork control

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
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.		Artwork and all pre-press processes conducted by the site shall be managed to ensure that loss of information and variation from the customer's specifications are eliminated.		
Clause	**Requirements**	**Clause**	**Requirements**	
5.2.1	The site shall have a documented artwork management procedure covering the activities for which the site has responsibility. This may include, but is not limited to: • collation of information to be included into artwork • receipt of artwork files from the customer • verification of completed artwork and approval by the customer.	5.2.1	The site shall have a documented artwork management procedure covering the activities for which the site has responsibility. This may include, but is not limited to: • collation of information to be included into artwork • receipt of artwork files from the customer • verification of completed artwork and approval by the customer.	
5.2.2	A process shall be in place to seek formal acceptance and approval of final product concepts and artworks by the specifier. The outcome shall be documented.	5.2.2	A process shall be in place to seek formal acceptance and approval of final product concepts and artworks by the specifier. The outcome shall be documented.	
5.2.3	Where appropriate, print trials shall be carried out and testing shall validate that the agreed product quality and print standards can be consistently achieved.	5.2.3	Where appropriate, print trials shall be carried out and testing shall validate that the agreed product quality and print standards can be consistently achieved.	

Clause	Requirements	Clause	Requirements	
5.2.4	Printing equipment such as plates, silk screens, anilox rollers, cylinders and blankets shall be verified as being correct to specification and artwork version or agreed master prior to use, and fully traceable to the customer's approved origination material.	5.2.4	Printing equipment such as plates, silk screens, anilox rollers, cylinders and blankets shall be verified as being correct to specification and artwork version or agreed master prior to use, and fully traceable to the customer's approved origination material.	
5.2.5	Customer-approved reference material, including artwork masters and colour standards used during print runs, shall be controlled to ensure minimisation of degradation and shall be returned to appropriate storage after use. The site shall have a policy to address requirements for renewal of approved masters, as necessary.	5.2.5	Customer-approved reference material, including artwork masters and colour standards used during print runs, shall be controlled to ensure minimisation of degradation and shall be returned to appropriate storage after use. The site shall have a policy to address requirements for the renewal of approved masters, as necessary.	
5.2.6	The site shall have a documented procedure for managing changes to artwork and print specifications to manage obsolete artwork and printing materials.	5.2.6	The site shall have a documented procedure for managing changes to artwork and print specifications to manage obsolete artwork and printing materials.	
5.2.7	Where artwork files and approved masters are in electronic form, these shall be suitably protected to prevent loss or malicious intervention.	5.2.7	Where artwork files and approved masters are in electronic form, these shall be suitably protected to prevent loss or malicious intervention.	

5.3 Packaging print control

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Where packaging materials are printed or decorated, procedures shall be in place to ensure that the information is fully legible and correctly reproduced to customer specification and any applicable legal requirements.		Where packaging materials are printed or decorated, documented procedures shall be in place to ensure that the information is fully legible and correctly reproduced to customer specification and complies with any legal requirements.		
Clause	**Requirements**	**Clause**	**Requirements**	
5.3.1	An assessment shall be carried out of the pre-press activity, print process and handling of printed packaging (product) to identify: • risks of loss of essential information • mixing of printed product. Controls shall be established and implemented to reduce the risks identified.	5.3.1	An assessment shall be carried out for the pre-press activity, print process and handling of printed packaging (product) to identify: • risks of loss of essential information • mixing of printed product. Controls shall be established and implemented to reduce the risks identified.	
5.3.2	Printing plates, cylinders, cutting dies, print blankets and any other printing equipment shall be appropriately stored to minimise damage.	5.3.2	Printing plates, cylinders, cutting dies, print blankets and any other printing equipment shall be appropriately stored to minimise damage.	
5.3.3	Each print run shall be approved against the agreed standard (or master sample). This shall be recorded.	5.3.3	Each print run shall be approved against the agreed standard (or master sample). This shall be recorded.	
5.3.4	A system shall be in place to detect and identify printing errors during the run and to sort these errors from the acceptable printed material.	5.3.4	A system shall be in place to detect and identify printing errors during the run and to sort these errors from the acceptable printed material.	
5.3.5	Where composite print is used (a mixture of different designs printed together), a process shall be in place to ensure effective segregation of differing print variants.	5.3.5	Where composite print is used (a mixture of different designs printed together), a process shall be in place to ensure effective segregation of differing print variants.	

Clause	Requirements	Clause	Requirements	
5.3.6	Samples of printed packaging shall be retained together with production records for a period of time to be agreed with the customer/ specifier/brand owner.	5.3.6	Samples of printed packaging shall be retained together with production records for a period of time to be agreed with the customer/ specifier/brand owner.	
5.3.7	Any unused printed product shall be accounted for and either disposed of or identified and appropriately stored.	5.3.7	Any unused printed product shall be accounted for and either disposed of or identified and appropriately stored.	
5.3.8	Lighting in print inspection cabinets and other means of print/ colour checking shall be agreed with the customer or conform to accepted industry standards.	5.3.8	Lighting in print inspection cabinets and other means of print/ colour checking shall be agreed with the customer or conform to accepted industry standards.	

5.4 Process control

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Documented procedures shall be in place to ensure effective quality assurance of operations throughout the process.		Documented procedures, work instructions and process specifications shall be in place to ensure effective quality assurance of operations throughout the process.		Addition of work instructions and process specifications.
Clause	**Requirements**	**Clause**	**Requirements**	
		5.4.1	The hazard and risk management team shall identify and record all potential product defects that are reasonably expected to occur at each step in relation to the product and process. The hazards considered shall include, where applicable: • product quality defects • defects that may have an impact on the functional integrity and performance of the final product in use • defects which result in the production of products which are outside customer-specified quality parameters.	HARA quality defects moved from section 2 to here.

Clause	Requirements	Clause	Requirements	
5.4.1	A review of the manufacturing and, where applicable, printing process shall identify manufacturing process control points that could significantly affect the quality of the products produced.	5.4.2	A review of the manufacturing and, where applicable, printing process shall identify manufacturing process control points that can prevent or limit the risk of producing products with quality defects.	Better control of quality is more clearly defined.
5.4.2	For each manufacturing process control point, machine settings or process limits shall be established and documented – the process specification.	5.4.3	For each manufacturing process control point, machine settings or process limits shall be established and documented – the process specification.	
		5.4.4	Where equipment settings are critical to the safety or legality of the product, changes to the equipment settings shall only be completed by trained and authorised staff. Where applicable, controls shall be password-protected or otherwise restricted.	New requirement on protecting those equipment settings that affect product safety or quality, which shall only be adjustable by authorised persons.
5.4.3	A bill of materials and process specification (including manufacturing process control points) shall be available for each batch or lot during production.	5.4.5	A bill of materials and process specification (including manufacturing process control points) shall be available for each batch or lot during production.	
5.4.4	Documented process checks shall be undertaken at start-up, following adjustments to equipment and periodically during production, to ensure products are consistently produced to the agreed quality specification.	5.4.6	Documented process checks shall be undertaken at start-up, following adjustments to equipment and periodically during production, to ensure products are consistently produced to the agreed quality specification.	
5.4.5	A documented clearance procedure shall be in place to ensure that at start-up the line is clear of all previous work and production documents.	5.4.7	A documented clearance procedure shall be in place to ensure that at start-up the line is clear of all previous work and production documents.	

Clause	Requirements	Clause	Requirements	
5.4.6	In the event of changes to product composition, processing methods or equipment, the site shall, where appropriate, re-establish process characteristics and validate product data to ensure product safety, legality and quality are achieved.	5.4.8	In the event of changes to product composition, processing methods or equipment, the site shall, where appropriate, re-establish process characteristics and validate product data to ensure that product safety, legality and quality are achieved.	
		5.4.9	The documented line clearance procedure shall include: • the roles of persons involved in line clearance • areas where materials can become trapped • validation of the line clearance • sign-off for continuing production. The line clearance procedure shall be fully implemented for each production run.	New requirement around a documented line clearance procedure, including roles and responsibilities.

5.5 Calibration and control of measuring and monitoring devices

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The site shall be able to demonstrate that measuring and monitoring equipment is sufficiently accurate and reliable to provide confidence in measurement results.		The site shall be able to demonstrate that measuring and monitoring equipment is sufficiently accurate and reliable to provide confidence in measurement results.		
Clause	**Requirements**	**Clause**	**Requirements**	
5.5.1	The site shall identify and control in-line and off-line measuring equipment used to monitor critical control points (where applicable) and product safety, quality and legality. This shall include as a minimum: • a documented list of equipment and its location	5.5.1	The site shall identify and control in-line and off-line measuring equipment used to monitor critical control points (where applicable) and product safety, quality and legality. This shall include, as a minimum: • a documented list of equipment and its location	

Clause	Requirements	Clause	Requirements	
	• an identification code and calibration due date • prevention from adjustment by unauthorised staff • protection from damage, deterioration and misuse.		• an identification code and calibration due date • prevention from adjustment by unauthorised staff • protection from damage, deterioration and misuse.	
5.5.2	All identified measuring equipment shall be checked and adjusted at a predetermined frequency, based on risk analysis. This shall be carried out by trained staff to a defined method to ensure accuracy within defined parameters. All results shall be documented. Where possible, calibration shall be traceable to a recognised national or international standard. Where a traceable calibration is not possible, the site shall demonstrate the basis by which standardisation is carried out.	5.5.2	All identified measuring equipment shall be checked and adjusted at a predetermined frequency, based on risk analysis. This shall be carried out by trained staff to a defined method to ensure accuracy within defined parameters. All results shall be documented. Where possible, calibration shall be traceable to a recognised national or international standard. Where a traceable calibration is not possible, the site shall demonstrate the basis by which standardisation is carried out.	
5.5.3	Corrective action and reporting procedures shall be established and documented in the event of the monitoring and testing procedure identifying any failure of product inspection, testing or measuring equipment. Any such failures shall be subject to an assessment of potential risk; subsequent action may include a combination of isolation, quarantine and re-inspection of products produced since the last acceptance test of the equipment. The site shall conduct a root cause analysis into the equipment failure and implement the appropriate corrective action.	5.5.3	Corrective action and reporting procedures shall be established and documented in the event of the monitoring and testing procedure identifying any failure of product inspection, testing or measuring equipment. Any such failures shall be subject to an assessment of potential risk; subsequent action may include a combination of isolation, quarantine and re-inspection of products produced since the last acceptance test of the equipment. The site shall conduct a root cause analysis into the equipment failure and implement the appropriate corrective action.	

5.6 Product inspection, testing and measuring

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company shall use appropriate documented procedures and facilities when undertaking or subcontracting inspection and analyses critical to product safety, legality and quality.		The company shall undertake appropriate inspections and analyses that are critical to product safety, legality, integrity and quality.		Reworded for clarity.
Clause	**Requirements**	**Clause**	**Requirements**	
5.6.1	Quality checks shall be carried out to demonstrate that the finished product is within the tolerances laid down in the agreed product specification and conforms to any critical technical/legal requirements. The frequency of checks shall be in accordance with industry-accepted practice or customer requirements and based on risk analysis.	5.6.1	Quality checks shall be carried out to demonstrate that the finished product is within the tolerances laid down in the agreed product specification and conforms to any critical technical/legal requirements. The frequency of checks and sampling shall be in accordance with industry-accepted practice or customer requirements and based on risk analysis. The site shall define how samples used for checking in-process quality are disposed of. This may be by returning to stock, regrinding/ recycling, or segregation and disposal.	Additional points on frequency of sampling, and disposition of used samples.
5.6.2	Hazard and risk analysis principles shall be used to determine the need for in-line product testing equipment to ensure product safety, quality and legality.	5.6.2	Hazard and risk analysis principles shall be used to determine the need for in-line product testing equipment to ensure product safety, quality and legality.	
5.6.3	The accuracy of in-line equipment shall be specified (with permitted tolerances), having due regard to the product parameter being controlled.	5.6.3	The accuracy of in-line equipment shall be specified (with permitted tolerances), having due regard to the product parameter being controlled.	

Clause	Requirements	Clause	Requirements	
5.6.4	The company shall establish, document and implement procedures for the operation, routine monitoring and testing of all equipment used in product inspection, testing and measurement. This shall include: • frequency and sensitivity of checks • authorisation of trained personnel to carry out specified tasks • documentation of test results.	5.6.4	The company shall establish, document and implement procedures for the operation, routine monitoring and testing of all equipment used in product inspection, testing and measurement. This shall include: • frequency and sensitivity of checks • authorisation of trained personnel to carry out specified tasks • documentation of test results.	
5.6.5	Routine off-line quality checks shall be carried out at appropriate stages in production to demonstrate that the product is within the tolerances laid down in the agreed product specification. A system, which includes off-line or randomised quality checks, shall be in place to identify and remove non-conforming product from the production lot and ensure that any appropriate action is taken in consideration of the root cause.	5.6.5	Routine off-line quality checks shall be carried out at appropriate stages in production to demonstrate that the product is within the tolerances laid down in the agreed product specification. A system that includes off-line or randomised quality checks shall be in place to identify and remove non-conforming product from the production lot.	Root cause analysis removed as dealt with in section 3.6.
5.6.6	In-line testing equipment critical to product quality or safety shall incorporate a system to identify non-conforming product for removal or divert it out of the product flow.	5.6.6	In-line testing equipment critical to product quality or safety shall incorporate a system to identify non-conforming product for removal or divert it out of the product flow.	
		5.6.7	Test methods, analytical methods and customer-approved reference samples (where required) shall be of the most recent version and be available in the laboratory or where off-line testing is conducted. Samples shall be suitably stored to avoid degradation.	Additional detail outlining those procedures that should be in place to ensure the reliability of test results (and testing).

Clause	Requirements	Clause	Requirements	
5.6.7	Procedures shall be in place to ensure the reliability of test results.	5.6.8	The test methods used by the site in both on-line and off-line testing shall be validated to ensure their sensitivity, reproducibility and range, in addition to any other relevant criteria. Where standardised tests are used, the site shall ensure prescribed methodologies are followed. Where testing shows out-of-specification results, a documented procedure for investigating these results shall be established and followed to determine whether the cause is non-conforming product or a testing failure.	New requirement about on-line and off-line testing. The tests shall conform to expectation regarding their execution and reliability. Includes a requirement to determine the cause of out-of-specification results.
		5.6.9	Where automated inspection equipment (e.g. vision systems) is used to check print or other material features, the site shall establish and implement procedures for the operation and testing of the equipment to ensure that it is correctly set up and capable of alerting or rejecting the packaging when it is out of specification. As a minimum, testing of the equipment shall be completed at: • the start of the production run • the end of the production run	New requirement on automated inspection equipment, reflecting the increase in use of this type of equipment.

Clause	Requirements	Clause	Requirements	
			• a frequency based on the site's ability to identify, hold and prevent the release of any implicated materials should the equipment fail (e.g. during the production run or when changing batches of raw materials). The site shall establish and implement procedures in the event of a failure in the equipment (e.g. a documented and trained manual checking procedure).	
5.6.8	Where the company undertakes or subcontracts analyses critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025 for the test undertaken (General requirements for the competence of testing and calibration laboratories). Documented justification shall be available where accredited methods are not undertaken.	5.6.10	Where the company undertakes or subcontracts an analysis critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025 for the test undertaken (General requirements for the competence of testing and calibration laboratories). Documented justification shall be available where accredited methods are not undertaken. The significance of the laboratory results shall be understood and acted upon accordingly.	Additional point requiring a company to act on laboratory results where necessary.

5.7 Control of non-conforming product

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The site shall ensure that out-of-specification product is clearly identified and quarantined.		The site shall ensure that out-of-specification product is clearly identified and effectively managed to prevent unauthorised release.		Additional point on prevention of unauthorised release of non-conforming product.
Clause	**Requirements**	**Clause**	**Requirements**	
5.7.1	Clear procedures for the control of out-of-specification or non-conforming materials shall be in place, documented and understood by all personnel. These shall include the effective identification and quarantining of materials before a decision has been made on their final disposition.	5.7.1	Clear procedures for the control of out-of-specification or non-conforming materials shall be in place, documented and understood by all personnel. These shall include the effective identification and management of materials before a decision has been made on their final disposition.	'Quarantining' replaced by 'management' for non-conforming product, as quarantining may be a type of management but it is not always the appropriate method.
5.7.2	Non-conforming materials shall be assessed and a decision taken to reject, accept by concession, rework or put to alternative use. The decision and reasons shall be documented.	5.7.2	Non-conforming materials shall be assessed and a decision taken to reject, accept by concession, rework or put to alternative use. The decision and reasons shall be documented.	
5.7.3	Corrective actions, root cause analysis and preventive actions shall be implemented to avoid recurrence of the non-conformity. Actions taken shall be documented.			Moved to section 3.6.

5.8 Incoming goods

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Incoming goods shall be appropriately checked for contents, packaging integrity and potential contamination.		The site shall ensure that incoming goods are appropriately checked for contents, packaging integrity and potential contamination.		Reworded for clarity.
Clause	**Requirements**	**Clause**	**Requirements**	
5.8.1	The site shall document a raw materials and intermediate product intake procedure to ensure that incoming goods match purchase or product specifications. This may take the form of: • purchase orders • delivery notes.	5.8.1	The site shall document a raw materials and intermediate product intake procedure to ensure that incoming goods match purchase or product specifications. This may take the form of: • purchase orders • delivery notes.	
		5.8.2	There shall be a procedure for the inspection of loads on arrival to ensure that products are free from pest infestation, contamination or damage and are in a satisfactory condition. Unloading areas for bulk deliveries shall be clearly identified and designed to prevent product mix-ups. Regarding raw materials, all complaints or defects identified by the site shall be recorded and investigated (including root cause analysis) and the results of the investigation documented.	New clause concerning the activities of incoming goods, requiring purchase orders to be matched to items delivered to prevent accidental delivery of incorrect loads. The site is also required to record any defect of the delivered product and manage it accordingly, preventing non-conforming raw materials from entering production where necessary.

Clause	Requirements	Clause	Requirements	
		5.8.3	The site shall have a procedure for the acceptance of raw materials. This may include a valid certificate of analysis (CoA) or testing. All raw materials awaiting the results of in-house testing or verification of data shall be held until released for use.	New requirement concerning the acceptance of raw materials.
5.8.2	Receipt documents and/or product identification shall facilitate correct stock rotation of goods in storage and, where appropriate, ensure materials are used in the correct order and within the prescribed shelf life.	5.8.4	Receipt documents and/or product identification shall facilitate correct stock rotation of goods in storage and, where appropriate, ensure materials are used in the correct order and within the prescribed shelf life.	
		5.8.5	The site shall have a system in place to validate all raw materials and intermediate products prior to their introduction to the process.	New requirement for the validation of raw materials prior to being introduced to production or production areas.

5.9 Storage of all materials and intermediate and finished products

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The storage of all materials and products shall minimise the risk of contamination or malicious intervention, and protect product safety, quality and legality.		The handling, management and storage of all materials and products shall minimise the risk of contamination or malicious intervention, and protect product safety, quality and legality.		Detail on handling and management added.
Clause	**Requirements**	**Clause**	**Requirements**	
		5.9.1	Procedures to maintain product safety and quality during storage shall be risk-based, understood by the relevant staff, and implemented accordingly. They shall include, as appropriate: • instructions for the packing of finished product • segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergenic), mixing of sorts, or taint • storage of product/ materials off the floor and away from walls • specific handling or stacking requirements to prevent product damage.	New requirement to maintain product safety and quality while in storage areas, assessing the potential for damage to finished products.
5.9.1	All materials, work in progress and product shall be properly identified and protected during storage by appropriate packaging to protect the product from contamination.	5.9.2	All materials, work in progress and finished product shall be properly identified and protected during storage by appropriate packaging to protect them from contamination.	
5.9.2	Storage, including off-site storage, shall be controlled to protect the product from contamination, including taint or odour and malicious intervention. Where off-site storage is used, the same site standards requirements apply as for on-site storage.	5.9.3	Storage, including off-site storage, shall be controlled to protect the product from contamination, including taint or odour and malicious intervention. Where off-site storage is used, the same site standards apply as for on-site storage.	

Clause	Requirements	Clause	Requirements	
		5.9.4	Finished or intermediate product storage shall meet customer requirements (with regard to first in, first out (FIFO), where applicable), with dispatch after positive release. Where external storage of finished product is required, the product shall be suitably protected.	New requirement for customers who may have specific requirements around how the finished product is dispatched to them.
		5.9.5	Packaging used for storage or dispatch of intermediate or finished products, such as pallets, shall be appropriately protected if stored outside and inspected for signs of damage or contamination prior to use.	New requirement to ensure that packaging is appropriate to prevent product safety and quality hazards.
5.9.3	In order to prevent contamination, documented procedures shall be in place to appropriately segregate raw materials, intermediate products and finished products.	5.9.6	In order to prevent contamination, documented procedures shall be in place to appropriately segregate raw materials, intermediate products and finished products.	
5.9.4	The site shall ensure that hazardous chemicals are handled in such a way that risk to product safety, quality and legality is minimised.	5.9.7	The site shall ensure that hazardous chemicals are handled in such a way that risk to product safety, quality and legality is minimised.	
5.9.5	Material intended for recycling shall be appropriately protected against contamination hazards.	5.9.8	Material intended for recycling shall be appropriately protected against contamination hazards.	

5.10 Dispatch and transport

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The dispatch and transport of raw materials and finished products shall be undertaken in a manner that minimises the risk of contamination or malicious intervention and maintains product safety, legality and quality.		The dispatch and transport of raw materials and finished products shall be undertaken in a manner that minimises the risk of contamination or malicious intervention and maintains product safety, legality and quality.		
Clause	**Requirements**	**Clause**	**Requirements**	
		5.10.1	The company shall have procedures for the dispatch and transport of products, which shall include: • any restrictions on the use of combined loads (e.g. where materials from other companies are in the same transport) • requirements for the security of products during transit, particularly when vehicles are parked and unattended away from a designated storage depot.	New requirement with specific details on the dispatch of finished products.
5.10.1	All products and materials shall be identified and either protected during distribution by appropriate external packaging or transported under conditions to protect the product from contamination. This shall include the risk of taint or odour and of malicious intervention.	5.10.2	All products and materials shall be identified and either protected during distribution by appropriate external packaging or transported under conditions to protect the product from contamination. This shall include the risk of taint or odour and of malicious intervention.	
5.10.2	All pallets shall be checked. Damaged, contaminated or unacceptable pallets shall be discarded. Wooden pallets that come into direct contact with finished products or raw materials shall not be allowed to contaminate the product. Wooden pallets, if used, shall be sound, dry, clean and free from damage and contamination.	5.10.3	All pallets shall be checked. Damaged, contaminated or unacceptable pallets shall be discarded. Wooden pallets that come into direct contact with finished products or raw materials shall not be allowed to contaminate the product. Wooden pallets, if used, shall be sound, dry, clean and free from damage and contamination.	

Clause	Requirements	Clause	Requirements	
5.10.3	All company-owned vehicles used for deliveries shall be included in the documented cleaning schedules and kept clean and in a condition to minimise the risk of product contamination.	5.10.4	All company-owned or leased vehicles used for deliveries shall be included in the documented cleaning schedules and kept clean and in a condition that minimises the risk of product contamination.	Addition of vehicle type.
5.10.4	All delivery vehicles and shipping containers shall be subject to a documented hygiene-checking procedure before loading.	5.10.5	All delivery vehicles and shipping containers shall be subject to a documented hygiene and odour checking procedure before loading.	Odour assessment is also required, as packaging can acquire odour very easily.
5.10.5	Where the company employs third-party contractors there shall be a contract or agreed terms and conditions. All the requirements specified in this section shall be clearly defined in the contract or the company shall be certificated to the Global Standard for Storage and Distribution. Where this is not possible, with general carriers, the packaging shall be adequate to protect the product against damage, contamination hazards, taint and odour.	5.10.6	Where the company employs third-party contractors, there shall be a contract or agreed terms and conditions. All the requirements specified in this section shall be clearly defined in the contract or the company shall be certificated to the Global Standard for Storage and Distribution. Where this is not possible, with general carriers, the packaging shall be adequate to protect the product against damage, contamination hazards, taint and odour.	
5.10.6	Vehicle drivers shall comply with the site rules relevant to this Standard. Access to the site for third-party transport personnel shall be controlled and, where possible, facilities provided to negate the need to enter storage or production areas.	5.10.7	Vehicle drivers shall comply with the site rules relevant to this Standard. Access to the site for third-party transport personnel shall be controlled and, where possible, facilities provided to negate the need to enter storage or production areas.	

6 Personnel

6.1 Training and competence: raw materials handling, preparation, processing, packing and storage areas

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
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.		The company shall ensure that all personnel performing work that affects product safety, legality and quality are adequately trained, instructed and supervised commensurate with their activity and that they are competent to undertake their job role.		Focus on personnel whose work affects product safety, quality and legality.
Clause	**Requirements**	**Clause**	**Requirements**	
6.1.1	All personnel, including temporary personnel and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period. Induction training shall include the company hygiene rules.	6.1.1	All personnel, including temporary personnel and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period. Induction training shall include the company hygiene rules.	
6.1.2	Where personnel are engaged in activities relating to product safety, quality and legality, relevant training and competency assessment shall be in place. This may include, but is not limited to: • product inspection, testing and measuring • calibration • printed packaging controls • operatives at manufacturing process control points.	6.1.2	Where personnel are engaged in activities relating to product safety, quality and legality, relevant training and competency assessment shall be in place. This may include, but is not limited to: • product inspection, testing and measuring • calibration • printed packaging controls • operatives at manufacturing process control points • laboratory testing • product defence.	Additional points for specific training.
		6.1.3	The site shall define and document how new or changed procedures, working methods and practices related to product safety or quality are communicated to relevant personnel.	New requirement to ensure that where information is changed, it is communicated effectively to the relevant personnel.

Clause	Requirements	Clause	Requirements	
6.1.3	The company shall routinely review and document the competencies of all staff and provide relevant training as appropriate. This may be in the form of training, refresher training, coaching, mentoring, or on-the-job experience.	6.1.4	The company shall routinely review and document the competencies of all staff and provide relevant training as appropriate. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience.	
6.1.4	Records of training shall be available. These shall include: • the name of the trainee and confirmation of attendance • the date and duration of the training • the title or course contents, as appropriate • the training provider (external or internal provider). Where training is undertaken by agencies on behalf of the company, records of the training shall be available.	6.1.5	Records of training shall be available. These shall include: • the name of the trainee and confirmation of attendance • the date and duration of the training • the title or course contents, as appropriate • the training provider (external or internal provider). Where training is undertaken by agencies on behalf of the company, records of the training shall be available.	
6.1.5	The site shall put in place documented programmes covering the training needs of relevant personnel. These shall include as a minimum: • identifying the necessary competencies for specific roles • providing training or other action to ensure staff have the necessary competencies • reviewing the effectiveness of training • the delivery of training in the appropriate language of trainees.	6.1.6	The site shall put in place documented programmes covering the training needs of relevant personnel. These shall include, as a minimum: • identifying the necessary competencies for specific roles • providing training or other action to ensure staff have the necessary competencies • reviewing the effectiveness of training and trainers • the delivery of training in the appropriate language of trainees.	Addition of review for effectiveness of trainers.

6.2 Personal hygiene: raw materials handling, preparation, processing, packing and storage areas

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The site's personal hygiene standards shall be developed to minimise the risk of product contamination from personnel. These standards shall be appropriate to the products produced and be adopted by all personnel, including agency-supplied staff, contractors and visitors to the production facility.		The site's personal hygiene standards shall be developed to minimise the risk of product contamination from personnel. These standards shall be appropriate to the products produced and be adopted by all personnel, including agency-supplied staff, contractors and visitors to the production facility.		
Clause	**Requirements**	**Clause**	**Requirements**	
6.2.1	The requirements for personal hygiene shall be documented and communicated to all personnel. These shall include, as a minimum, the following instructions: • watches shall not be worn • jewellery shall not be worn on exposed parts of the body, with the exception of a plain wedding ring or wedding wristband and sleeper earrings (continuous loop). • perfume or aftershave shall not be worn. Compliance with the requirements shall be checked routinely.	6.2.1	The requirements for personal hygiene at sites producing materials for direct contact with food or other hygiene-sensitive products shall be documented and communicated to all personnel. These shall include, as a minimum, the following instructions: • wrist bands, wrist-worn devices or watches shall not be worn • jewellery including piercings shall not be worn on exposed parts of the body, with the exception of a plain wedding ring, wedding wristband or medical alert jewellery • fingernails shall be kept short and clean and free from nail varnish • false fingernails and nail art shall not be worn • excessive perfume or aftershave shall not be worn. Requirements at sites producing materials not for contact with food shall be based on risk assessment. Compliance with the site's requirements shall be checked routinely.	The clause applies to sites producing materials intended to come into direct contact with food and other hygiene-sensitive products. Wrist bands as well as watches are not permitted. Medical alert jewellery is permissible. Piercings (as jewellery) rather than specific types of piercing are excluded. Specific rules are given on fingernails and false fingernails. Risk assessment to be completed for personal hygiene requirements at sites not producing materials intended for direct contact with food.

Clause	Requirements	Clause	Requirements	
6.2.2	Hand washing shall be performed on entry to the production areas and at a frequency that is appropriate to minimise the risk of product contamination.	6.2.2	Hand-washing shall be performed on entry to the production areas and at a frequency that is appropriate to minimise the risk of product contamination.	
6.2.3	Personal items and belongings, including personal mobile phones, shall not be taken into production areas without the permission of the management.	6.2.3	Personal items and belongings, including personal mobile phones, shall not be taken into production areas without the permission of the management.	
6.2.4	Procedures and written instructions shall be in place to control the use and storage of personal medicines, to minimise the risk of product contamination.	6.2.4	The site shall use risk assessment to determine the procedures and written instructions necessary to control the use and storage of personal medicines in production and storage areas, to minimise the risk of product contamination.	Risk assessment to be conducted for the use of medicines.
6.2.5	Fingernails shall be kept short and clean. False fingernails, nail varnish/ polish or nail art shall not be permitted. Where visitors cannot comply, suitable control procedures shall be in place (e.g. non-handling of product, use of gloves).	6.2.5	Where visitors cannot comply with site hygiene rules, suitable control procedures shall be in place (e.g. non-handling of product, use of gloves).	Additional detail for clarity.
6.2.6	All cuts and grazes on exposed skin shall be covered by an appropriately coloured plaster that is different from the product colour (preferably blue). These shall be site issued and monitored when involved in work with materials intended to come into direct contact with food or other hygiene-sensitive products. Where appropriate, in addition to the plaster, a finger stall or glove shall be worn.	6.2.6	All cuts and grazes on exposed skin shall be covered by an appropriately coloured plaster that is different from the product colour (preferably blue). These shall be site-issued and monitored when people are involved in work with materials intended to come into direct contact with food or other hygiene-sensitive products. Where appropriate, in addition to the plaster, a finger stall or glove shall be worn.	

6.3 Staff facilities

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Staff facilities shall be sufficient to accommodate the required number of personnel and shall be designed and operated to minimise the risk of product contamination. Such facilities shall be kept in a good and clean condition.		Staff facilities shall be sufficient to accommodate the required number of personnel and shall be designed and operated to minimise the risk of product contamination. Such facilities shall be kept in a good and clean condition.		
Clause	**Requirements**	**Clause**	**Requirements**	
6.3.1	Locker rooms shall be accessed without the need to enter production areas unless appropriately segregated walkways are in place.	6.3.1	Locker rooms shall be accessed without the need to enter production areas unless appropriately segregated walkways are in place.	
6.3.2	Lockers shall be provided for all personnel who work in raw material handling, processing, preparation, packing and storage areas. Lockers shall be of sufficient size to accommodate all reasonable personal items and any protective clothing required.	6.3.2	Lockers shall be provided for all personnel who work in raw material handling, processing, preparation, packing and storage areas. Lockers shall be of sufficient size to accommodate all reasonable personal items and any protective clothing required.	
6.3.3	Site-issued protective clothing and personal clothing shall not be stored in the same locker or shall be effectively segregated within the locker.	6.3.3	Site-issued protective clothing and personal clothing shall not be stored in the same locker or shall be appropriately segregated based on risk within the locker.	Appropriate segregation within lockers for clothing (based on risk).
6.3.4	Eating (including the eating of confectionery and chewing of gum or tobacco), drinking and smoking shall not be allowed in locker and changing rooms.	6.3.4	Eating (including the eating of confectionery and chewing of gum or tobacco), drinking and smoking shall not be allowed in locker and changing rooms.	

Clause	Requirements	Clause	Requirements	
6.3.5	Suitable and sufficient hand-washing facilities shall be available to enable cleaning of hands before commencing work, after breaks, and as necessary during the course of work. Such hand-washing facilities shall provide, as a minimum: • sufficient quantity of water at a suitable temperature to encourage hand washing • unscented liquid soap or foam • adequate hand-drying facilities • advisory signs to prompt use (including signs in appropriate languages). Where materials are handled that will be in direct contact with food or other hygiene-sensitive products, hand-washing facilities shall be sited at the entrance to the production area.	6.3.5	Suitable and sufficient hand-washing facilities shall be available to enable cleaning of hands before commencing work, after breaks, and as necessary during the course of work. Such hand-washing facilities shall provide, as a minimum: • sufficient quantity of water at a suitable temperature to encourage hand-washing • unscented liquid soap or foam • adequate hand-drying facilities • advisory signs to prompt use (including signs in appropriate languages). Where materials are handled that will be in direct contact with food or other hygiene-sensitive products, hand-washing facilities shall be sited at the entrance to the production area.	
6.3.6	Toilets shall not open directly into storage, processing or production areas in order to prevent the risk of contamination to product. Toilets shall be provided with suitable and sufficient hand-washing facilities.	6.3.6	Toilets shall not open directly into storage, processing or production areas in order to prevent the risk of contamination to product. Toilets shall be provided with suitable and sufficient hand-washing facilities.	
6.3.7	Facilities for visitors and contractors shall enable compliance with the site's hygiene policy.	6.3.7	Facilities for visitors and contractors shall enable compliance with the site's hygiene policy.	
6.3.8	All food brought into manufacturing premises shall be stored in a clean and hygienic state. No food shall be taken into storage, processing or production areas.	6.3.8	All food brought into manufacturing premises shall be stored in a clean and hygienic state. No food shall be taken into storage, processing or production areas.	

Clause	Requirements	Clause	Requirements	
6.3.9	Eating (including the eating of confectionery and chewing of gum or tobacco), drinking and smoking shall not be allowed in the production or storage areas. If it is impractical for personnel to leave their work area, local controlled facilities (such as a fully walled area with hand-washing facilities) shall be provided.	6.3.9	Eating (including the eating of confectionery and chewing of gum or tobacco), drinking and smoking shall not be allowed in the production or storage areas. If it is impractical for personnel to leave their work area, local controlled facilities (such as a fully walled area with hand-washing facilities) shall be provided.	
6.3.10	Drinking of water from purpose-made dispensers and/or by using disposable conical cups or spill-proof lidded containers may be allowed, provided it is confined to a designated area away from equipment.	6.3.10	Drinking of water from purpose-made dispensers and/or by using disposable conical cups or spill-proof lidded containers may be allowed, provided it is confined to a designated area away from equipment.	
6.3.11	Where smoking is allowed under national law, it shall only be permitted in designated controlled smoking areas which shall be isolated from production and storage areas and fitted with extraction to the exterior of the building. Adequate arrangements for dealing with smokers' waste shall also be provided at smoking facilities, both inside buildings and at external locations. The use of electronic cigarettes and associated materials shall not be permitted in locker rooms, or in production or storage areas, and shall only be permitted in designated smoking areas.	6.3.11	Where smoking is allowed under national law, it shall only be permitted in designated controlled smoking areas which shall be isolated from production and storage areas and fitted with extraction equipment to the exterior of the building. Adequate arrangements for dealing with smokers' waste shall also be provided at smoking facilities, both inside buildings and at external locations. The use of electronic cigarettes and associated materials shall not be permitted in locker rooms, nor in production or storage areas, and shall only be permitted in designated smoking areas.	

6.4 Medical screening

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company shall ensure that documented procedures are in place to ensure health conditions likely to adversely affect product safety are monitored and controlled.		Sites that manufacture packaging for direct contact with food or other hygiene-sensitive products shall ensure that documented procedures are in place to ensure that health conditions likely to adversely affect product safety are monitored and controlled.		Applies to sites that produce materials intended for direct food contact or other hygiene-sensitive products (formerly high-hygiene category).
Clause	**Requirements**	**Clause**	**Requirements**	
6.4.1	Where there is handling of materials intended for direct contact with food or other hygiene-sensitive products, the site shall make employees aware of the symptoms of infection, disease or condition which would prevent a person working. The site shall have a procedure for the notification by personnel, including temporary personnel, of any relevant infections, diseases or conditions with which they may have been in contact or be suffering from. Employees, contractors and visitors suffering from any of the above shall be excluded from work involving the handling of direct-food contact or other hygiene-sensitive product packaging for as long as the symptoms persist.	6.4.1	Where there is handling of materials intended for direct contact with food or other hygiene-sensitive products, the site shall make employees aware of the symptoms of infection, disease or condition which would prevent a person working. The site shall have a procedure for the notification by personnel, including temporary personnel, of any relevant infections, diseases or conditions with which they may have been in contact or be suffering from. Employees, contractors and visitors suffering from any of the above shall be excluded from work involving the handling of direct food contact or other hygiene-sensitive product packaging for as long as the symptoms persist.	
6.4.2	Where permitted by law, visitors and contractors shall be required to fill in a health questionnaire or otherwise confirm that they are not suffering from any symptoms which may put product safety at risk, prior to being allowed into production, packing or storage areas.	6.4.2	Where permitted by law, visitors and contractors shall be required to fill in a health questionnaire or otherwise confirm that they are not suffering from any symptoms which may put product safety at risk, prior to being allowed into production, packing or storage areas.	

Clause	Requirements	Clause	Requirements	
		6.4.3	Medical screening for sites producing materials that will not come into direct contact with food or other hygiene-sensitive products shall be implemented on the basis of risk.	Sites that do not produce materials intended to come into direct contact with food or other hygiene-sensitive products can use risk assessment to determine whether medical screening is required.

6.5 Protective clothing

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Appropriate protective clothing shall be worn in production and storage areas to minimise the risk of product contamination.		Appropriate protective clothing shall be worn in production and storage areas to minimise the risk of product contamination.		
Clause	**Requirements**	**Clause**	**Requirements**	
6.5.1	Hazard and risk principles shall be used to determine the need for protective clothing, including garments and footwear in raw materials handling, preparation, production and storage areas. Where no need for protective clothing has been established by risk assessment in a particular area, it shall be fully justified and shall not pose a contamination risk to the product.	6.5.1	Hair coverings and/or beard snoods, where appropriate, shall be worn in production areas at sites manufacturing materials for direct contact with food or other hygiene-sensitive products. Hazard and risk principles shall be used to determine the need for any other protective clothing, including garments and footwear in areas handling raw materials, and in preparation, production and storage areas. Where risk assessment has determined that protective clothing is not required in a particular area, it shall be fully justified and not pose a contamination risk to the product.	Personnel at sites producing materials for direct contact with food or other hygiene-sensitive products must wear hair coverings and snoods.

Clause	Requirements	Clause	Requirements	
6.5.2	The company shall use risk assessment to determine, document and communicate to all employees, including temporary personnel and contractors, the rules regarding: • the wearing of protective clothing on the journey to work • the wearing of protective clothing in raw materials handling, preparation, production and storage areas • the wearing of protective clothing away from the production environment (e.g. removal before entering toilets, canteen or smoking areas).	6.5.2	The company shall use risk assessment to determine, document and communicate to all employees, including temporary personnel and contractors, the rules regarding the wearing of protective clothing in all situations, including: • during the journey to work • in raw materials handling, preparation, production and storage areas • when away from the production environment (e.g. removal before entering toilets, canteen or smoking areas).	
6.5.3	Where the need for protective clothing has been determined, appropriate clean protective clothing that cannot contaminate the product shall be worn. Sufficient sets of clothing appropriate to the activities carried out shall be provided.	6.5.3	Where protective clothing is required, appropriate clean protective clothing that cannot contaminate the product shall be worn. Sufficient sets of clothing appropriate to the activities being carried out shall be provided.	Reworded for clarity.
6.5.4	Protective clothing worn in production areas shall provide adequate coverage of the upper torso. Where there is handling of materials intended for direct contact with food or other hygiene-sensitive products, the clothing shall have no external pockets on the upper body garments or sewn-on buttons. Changes of such clothing shall be available at all times as required.	6.5.4	Protective clothing worn in production areas shall provide adequate coverage. Where there is handling of materials intended for direct contact with food or other hygiene-sensitive products, the clothing shall have no external pockets on the upper body garments or sewn-on buttons. Changes of such clothing shall be available at all times as required.	

Clause	Requirements	Clause	Requirements	
6.5.5	Based on the assessment of risk to the product, suitable footwear shall be worn within the factory environment.	6.5.5	Based on the assessment of risk to the product, suitable footwear shall be worn within the factory environment.	
6.5.6	In production and packing areas, hazard and risk analysis shall be used to determine the need for: • snoods for beards and moustaches • scalp hair coverings.			Removed as addressed in clause 6.5.1.
6.5.7	If gloves are used they shall be replaced regularly, be distinctive, intact and not cause a contamination risk to the product.	6.5.6	If gloves are used they shall be replaced regularly, be distinctive, intact and not cause a contamination risk to the product.	
6.5.8	Protective clothing shall be kept clean and laundered. Laundering shall be carried out by one of the following methods: • professional laundry service • in-house • controlled laundering facilities • self-care.	6.5.7	Protective clothing shall be kept clean and laundered. Laundering shall be carried out by one of the following methods: • professional laundry service • in-house • controlled laundering facilities • home laundry.	Use of new term 'home laundry' instead of self-care.

Clause	Requirements	Clause	Requirements	
6.5.9	Where self-care laundry is permitted, it shall be ensured that: • employees have received written instructions regarding the laundering process to be used and these shall be reinforced as part of an induction or other in-house training programme • employees shall be provided with suitable means to safely transport washed garments from home to the workplace • there shall be a defined process within the site for monitoring the effectiveness of the system • there shall be a procedure and system for dealing with any case where employees are unable to perform self-laundry effectively, through lack of either diligence or facilities.	6.5.8	Where home laundry is permitted, the site shall ensure that: • employees have received written instructions regarding the laundering process to be used and these shall be reinforced as part of an induction or other in-house training programme • employees shall be provided with a bag or other suitable means to safely transport washed garments from home to the workplace • there shall be a defined process within the site for monitoring the effectiveness of the system • there shall be a procedure and system for dealing with any case where employees are unable to perform home laundry effectively, either through lack of diligence or inadequate facilities.	Addition of detail for clarity.
6.5.10	Clean and dirty clothing shall be segregated and controlled to prevent cross-contamination.	6.5.9	Clean and dirty clothing shall be segregated and controlled to prevent cross-contamination.	
6.5.11	Disposable protective clothing, if used, shall be subject to adequate control to avoid product contamination.	6.5.10	Disposable protective clothing, if used, shall be subject to adequate control to avoid product contamination.	

7 Requirements for traded products (previously 7 Requirements of the Traded Goods Module)

Where a site purchases and sells packaging products that would normally fall within the scope of the Standard and are stored at the site's facilities, but which are not manufactured at the site being audited, the site's management of these products is covered by the requirements in this section. This was previously covered in an additional module; however, to ensure greater control of these types of product, requirements for traded goods have been incorporated into the main Standard.

All the relevant requirements from sections 1 to 6 must also be fulfilled in addition to the requirements outlined in this section.

7.1 Approval and performance monitoring of manufacturers/packers of traded packaging products

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company shall operate procedures for approval of the last manufacturer or packer of packaging products which are traded to ensure that traded packaging products are safe, legal and manufactured in accordance with any defined product specifications.		The company shall operate procedures for approval of the last manufacturer or packer of packaging products which are traded to ensure that traded packaging products are safe, legal and manufactured in accordance with any defined product specifications.		In line with Food Safety Issue 8.
Clause	**Requirements**	**Clause**	**Requirements**	
7.1.1	The company shall have a documented supplier approval procedure which identifies the process for initial and ongoing approval of suppliers and the manufacturer/processor of each product traded. The requirements shall be based on the results of a risk assessment which shall include consideration of: • the nature of the product and associated risks • customer-specific requirements • legislative requirements in the country of sale or importation of the product • the brand identity of products (i.e. customer own brand or branded product).	7.1.1	The company shall have a documented supplier approval procedure which identifies the process for initial and ongoing approval of suppliers and the manufacturer/processor of each product traded. The requirements shall be based on the results of a risk assessment which shall include consideration of: • the nature of the product and associated risks • customer-specific requirements • legislative requirements in the country of sale or importation of the product • the brand identity of the products (i.e. customer own brand or branded product).	

Clause	Requirements	Clause	Requirements	
7.1.2	The process for the initial and ongoing approval of the manufacturers of products shall be based on: • certification of the manufacturing/packing site to the applicable BRC Global Standards or other Global Food Safety Initiative (GFSI) benchmarked standard and/or • supplier audit with a scope to include product safety, traceability testing and hazard and risk management systems and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety and quality management auditor. By exception, and only where a valid risk-based justification is provided, initial and ongoing approval may be based on: • a historical trading relationship supported by documented evidence of performance reviews demonstrating satisfactory performance • a manufacturing-site questionnaire which has been reviewed and verified by a demonstrably competent person • a specific customer requirement to supply product from a manufacturer where liability is with the customer.	7.1.2	The company shall have a procedure for the initial and ongoing approval of the manufacturers of products. This approval procedure shall be based on risk and include either one or a combination of: • a valid certification to the applicable Global Standard or other GFSI-benchmarked standard. The scope of the certification shall include the products purchased • supplier audits, with a scope to include product safety, traceability, hazard and risk management systems review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety and quality management auditor. Where this supplier audit is completed by a second or third party, the company shall be able to: – demonstrate the competency of the auditor – confirm that the scope of the audit includes product safety, traceability, HARA review and good manufacturing practices – obtain and review a copy of the full audit report. By exception, and only where a valid risk-based justification is provided, initial and ongoing approval may be based on: • a historical trading relationship supported	Now a risk-based procedure. Auditor competency, audit scope and audit reports conducted by external service providers shall be verified.

Clause	Requirements	Clause	Requirements	
			by documented evidence of performance reviews demonstrating satisfactory performance • a manufacturing site questionnaire which has been reviewed and verified by a demonstrably competent person • a specific customer requirement to supply product from a manufacturer where liability is with the customer.	
7.1.3	Records shall be maintained of the manufacturer's or packer's approval process, including audit reports or verified certificates confirming the product safety status of the manufacturing/ packing sites supplying the products traded. There shall be a process of review, and records of follow-up of any issues identified at the manufacturing/packing sites with the potential to affect packaging products traded by the company.	7.1.3	Records shall be maintained of the manufacturer's or packer's approval process, including audit reports or verified certificates confirming the product safety status of the manufacturing/ packing sites supplying the products traded. There shall be a process of review, and records of follow-up of any issues identified at the manufacturing/packing sites with the potential to affect packaging products traded by the company.	

Clause	Requirements	Clause	Requirements	
7.1.4	There shall be a documented process for the ongoing review of manufacturers or packers, based on risk and using defined performance criteria, which may include: • complaints • results of any product tests • regulatory warnings/ alerts • customer rejections or feedback. The process shall be fully implemented.	7.1.4	There shall be a documented process for the ongoing review of manufacturers or packers, based on risk and using defined performance criteria, which shall include: • complaints • results of any product tests • regulatory warnings/ alerts • customer rejections or feedback. The process shall be fully implemented.	

7.2 Specifications

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
Specifications, including a declaration of compliance, where applicable, or other information to meet legal requirements and assist customers in the safe usage of the product shall be maintained and available to customers.		Specifications or information to meet legal requirements and assist customers in the safe usage of the product shall be maintained and available to customers.		
Clause	**Requirements**	**Clause**	**Requirements**	
7.2.1	Specifications shall be available for all products. These shall either be in the agreed format as supplied by the customer or, where this is not specified, include key data to meet legal requirements and assist the customer in the safe usage of the product.	7.2.1	Specifications shall be available for all products. These shall either be in the agreed format as supplied by the customer or, where this is not specified, include key data to meet legal requirements and assist the customer in the safe usage of the product. Specifications may be in the form of a printed or electronic document, or part of an online specification system.	Clarifies permitted formats of the specifications.

Clause	Requirements	Clause	Requirements	
7.2.2	The company shall seek formal agreement of the specifications with relevant parties. Where specifications are not formally agreed, the company shall be able to demonstrate that it has taken steps to put an agreement in place.	7.2.2	The company shall seek formal agreement of the specifications with relevant parties. Where specifications are not formally agreed, the company shall be able to demonstrate that it has taken steps to put an agreement in place.	
7.2.3	Companies shall operate demonstrable processes to ensure that any customer-specified requirements are met. This may be by inclusion of customer requirements within buying specifications or by undertaking further work on the purchased product to meet the customer's specification (e.g. sorting or grading of product).	7.2.3	Companies shall operate demonstrable processes to ensure that any customer-specified requirements are met. This may be by inclusion of customer requirements within buying specifications or by undertaking further work on the purchased product to meet the customer's specification (e.g. sorting or grading of product).	
7.2.4	Specifications shall be reviewed whenever products/packaging or suppliers change or as a minimum at least every 3 years. The date of review and the approval of any changes shall be recorded.	7.2.4	Specifications shall be reviewed whenever products/packaging or suppliers change or at least every 3 years. The date of review and the approval of any changes shall be recorded.	

7.3 Product inspection and laboratory testing

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The site shall operate processes to ensure that the products received comply with buying specifications and that the supplied product is in accordance with any customer specification.		The site shall operate processes to ensure that the products received comply with buying specifications and that the supplied product is in accordance with any customer specification.		
Clause	**Requirements**	**Clause**	**Requirements**	
7.3.1	The site shall use risk assessment where product sampling or testing is required to verify that the products are in accordance with buying specifications and meet legal and safety requirements. Where verification is based on sampling, the sample rate and assessment process shall be risk-based. Records of the results of assessments or analysis shall be maintained.	7.3.1	The site shall use risk assessment where product sampling or testing is required to verify that the products are in accordance with buying specifications and meet legal and safety requirements. Where verification is based on sampling, the sample rate and assessment process shall be risk-based. Records of the results of assessments or analysis shall be maintained.	
7.3.2	Where verification of conformity is provided by the supplier (e.g. certificates of conformity or analysis), the company shall use risk assessment to determine whether periodic independent product analysis may be required to assure confidence in the information provided.	7.3.2	Where verification of conformity is provided by the supplier (e.g. certificates of conformity or analysis), the company shall use risk assessment to determine whether periodic independent product analysis may be required to ensure confidence in the information provided.	
7.3.3	Where claims are made about the products being handled, including the provenance, chain of custody or assured status of a product, supporting information shall be available from the supplier or independently to verify the claim.	7.3.3	Where claims are made about the products being handled, including the provenance, chain of custody or assured status of a product, supporting information shall be available from the supplier or independently to verify the claim.	

Clause	Requirements	Clause	Requirements	
7.3.4	Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025. Documented justification shall be available where non-accredited test methods are used.	7.3.4	Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025. Documented justification shall be available where non-accredited test methods are used.	
7.3.5	Test and inspection results shall be retained and reviewed to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.	7.3.5	Test and inspection results shall be retained and reviewed to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.	

7.4 Product legality

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company shall have processes in place to ensure that the products traded comply with the legal requirements in the country of sale where known.		The company shall have processes in place to ensure that the products traded comply with the legal requirements in the country of sale where known.		
Clause	**Requirements**	**Clause**	**Requirements**	
7.4.1	The company shall have documented processes to verify the legality of products which are traded. This shall include as applicable: • labelling information • compliance with relevant legal compositional requirements • compliance with quantity or volume requirements. Where such responsibilities are undertaken by the customer, this shall be clearly stated in contracts.	7.4.1	The company shall have documented processes to verify the legality of products which are traded. These shall include, as applicable: • labelling information • compliance with relevant legal compositional requirements • compliance with quantity or volume requirements. Where such responsibilities are undertaken by the customer, this shall be clearly stated in contracts.	

7.5 Traceability

Issue 5		Issue 6		Comments
Statement of intent		**Statement of intent**		
The company shall be able to trace all product lots back to the last manufacturer and forward to the customer of the company.		The company shall be able to trace all product lots back to the last manufacturer and forward to the customer of the company.		
Clause	**Requirements**	**Clause**	**Requirements**	
7.5.1	The site shall maintain a traceability system for all batches of product which identifies the last manufacturer or packer of the product. Records shall also be maintained to identify the recipient of each batch of product from the company.	7.5.1	The site shall maintain a traceability system for all batches of product which identify the last manufacturer or packer of the product. Records shall also be maintained to identify the recipient of each batch of product from the company.	
7.5.2	The company shall test the traceability system at least annually to ensure that traceability can be determined back to the last manufacturer and forward to the recipient of the product from the company. This shall include identification of the movement of the product through the chain from the manufacturer to receipt by the company (e.g. each movement and intermediate place of storage).	7.5.2	The company shall test the traceability system at least annually to ensure that traceability can be determined back to the last manufacturer and forward to the recipient of the product from the company. This shall include identification of the movement of the product through the chain from the manufacturer to receipt by the company (e.g. each movement and intermediate place of storage).	
7.5.3	The traceability test shall include the reconciliation of quantities of product received by the company for the chosen batch or product lot.	7.5.3	The traceability test shall include the reconciliation of quantities of product received by the company for the chosen batch or product lot.	
7.5.4	Where the product is further processed on behalf of the company, relabelled or returned, traceability shall be maintained.			No longer required as addressed in the preceding clauses.

BRCGS Packaging Materials

BRCGS
Floor 2
7 Harp Lane
London EC3R 6DP

T: +44 (0)20 3931 8150
E: enquiries@brcgs.com

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