

**ISSUE 6
PACKAGING
MATERIALS**

**Transition
Guide for
Basic Hygiene
Sites**

**TRANSITION GUIDE FOR
BASIC HYGIENE SITES**

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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.

Previous issues of the Standard recognised two levels of hygiene requirements, basic and high, to reflect the different manufacturing processes and usage of materials produced. In practice, usage of the basic hygiene requirements has decreased as customers require greater assurance, and the differences between the two levels have decreased with each new issue of the Standard. Following consultation and agreement, in Issue 6 of the Standard, the basic- and high-level hygiene requirements were consolidated into one level. Sites are now fully responsible for developing a risk-based hygiene programme tailored to their needs and customer expectations.

BRCGS aims to support those basic hygiene sites that are certificated against Issue 5 of the Standard through the publication of this guideline. Companies can now take ownership of the hygiene requirements for their sites and personnel on the basis of risk, as with all activities included in the scope of their operations. This remains consistent with the essential requirements of the Standard for product safety, legality and quality. Sites are able to use this guide to help identify the additional hygiene requirements and available options (i.e. to justify why certain clauses may be interpreted on the basis of risk or may not be applicable). Justification for risk-based deviations (as defined in the Standard) is made by providing objective evidence in the form of a risk assessment.

Certain factors need to be taken into consideration by the hazard analysis and risk assessment (HARA) team when developing the risk assessment, such as intended use, agreed customer expectations, and regulations for production, both locally and in the regions of intended sale. The type of packaging material and its intended use must also be considered (e.g. direct food contact or contact with hygiene-sensitive consumer products, such as cosmetics, nursery items and simple wound dressings).

BRCGS wishes to thank all parties involved in the review and production of this guide.

New hygiene clauses for sites

Table 1 contains a summary of the clauses in Issue 6 that are new for basic hygiene sites certificated to Issue 5, with an indication as to which clauses are potentially non-applicable, and which can be deviated from based on risk. Some examples are given in the next section. Those clauses marked 'N' must be complied with.

Table 1 Clauses new to existing basic hygiene sites certificated to Issue 5

Requirement (new to basic hygiene) and clause number		Description (please refer to the Standard for the wording of the clause)	Potential non-applicable clause?	Can be deviated from on the basis of risk?
3.5 Product safety and quality management – internal audits	3.5.5	Documented hygiene inspections for food contact or hygiene-sensitive packaging materials	Y	N
		Frequency of inspections based on risk	Y	Y
4.2 Site standards – building fabrics and interiors	4.2.2	Construction of suspended ceilings	Y	N
	4.2.3	Internal drains protection	N	N
	4.2.4	Protection of windows and roof glazing from breakage	N	Y
	4.2.5	Non-production glass breakage protection	N	Y
4.3 Site standards – utilities	4.3.2	Monitoring of the quality of water, air and other gases	N	Y
	4.5.4	Sorting and direct handling of product	N	N
	4.5.5	Designated, segregated area for at-risk activities	N	N
	4.5.7	Movement of personnel through simple, logical routes	N	N
4.6 Site standards – equipment	4.6.3	Sealing, cleanliness and condition of wooden equipment	Y	Y
	4.6.4	Cleanable and secure notices on equipment	N	N
4.7 Site standards – maintenance	4.7.1	Documented maintenance programme	N	N
	4.7.2	Maintenance logs for off-line testing equipment	N	N
	4.7.4	Documented clearance procedure following maintenance work	N	N
	4.7.5	Clearance and storage of tools and maintenance equipment after use	N	N

Requirement (new to basic hygiene) and clause number		Description (please refer to the Standard for the wording of the clause)	Potential non-applicable clause?	Can be deviated from on the basis of risk?
4.8 Site standards – housekeeping and cleaning	4.8.2	Documented cleaning procedures	N	Y
	4.8.4	Segregation of toilet-cleaning materials	N	N
	4.8.5	Risk-based microbiological environmental monitoring programme	N	Y
4.9 Site standards – product contamination control	4.9.1.2	Breakage register for glass and brittle plastics	N	N
	4.9.2.4	The use of open notice boards in production, packing and storage areas	N	Y
4.10 Site standards – waste and waste disposal	4.10.6	Use of third-party specialist for disposal of trademarked materials	N	N
	4.10.7	External storage of refuse in designated and maintained areas	N	N
4.11 Site standards – pest management	4.11.7	Catch analysis following infestation to identify problem areas	N	N
5.6 Product and process control – product inspection, testing and measuring	5.6.6	In-line testing equipment to identify and remove non-conforming product	N	N
5.9 Product and process control – storage of all materials and intermediate and finished products	5.9.6	Documented procedures to segregate raw materials, intermediate products and finished products	N	N
5.10 Product and process control – dispatch and transport	5.10.5	Documented hygiene and odour checking procedure of all shipping containers and delivery vehicles	N	N
6.2 Personnel – personal hygiene: raw materials handling, preparation, processing, packing and storage areas	6.2.2	Hand-washing at entry to production areas	N	Y
	6.2.4	Controlled use and storage of personal medicines	N	Y
	6.2.6	Coverage of cuts and grazes	N	Y
6.3 Personnel – staff facilities	6.3.1	Access to lockers, away from production areas	N	Y
	6.3.2	Provision of lockers for personnel in production	N	Y

Requirement (new to basic hygiene) and clause number		Description (please refer to the Standard for the wording of the clause)	Potential non-applicable clause?	Can be deviated from on the basis of risk?
	6.3.3	Segregation of protective clothing and personal clothing within locker	N	Y
	6.3.8	Storage of personal food in clean and hygienic state, away from storage, processing or production areas	N	Y
6.4 Personnel – medical screening	6.4.1	Documented procedures for health monitoring of staff, visitors and contractors	N	Y
	6.4.2	Completion of health questionnaire by visitors and contractors	N	Y
	6.4.3	Use of risk assessment to determine need for medical screening	N	N
6.5 Personnel – protective clothing	6.5.4	Coverage provided by protective clothing	N	Y
	6.5.5	Suitable footwear	N	Y
	6.5.6	Regular replacement of gloves	N	Y
	6.5.7	Laundering methods and cleanliness of protective clothing	N	Y
	6.5.8	Cleaning instructions and effective monitoring of home laundry	N	Y
	6.5.9	Segregation and control of clean and dirty clothing	N	Y
	6.5.10	Control of disposable protective clothing	N	Y

Guidance on risk-based deviations versus non-applicable clauses

Risk-based deviations

As summarised in Table 1, a significant proportion of the clauses new to basic hygiene sites can be deviated from based on risk.

Examples

Clause 6.2.2 Hand-washing at entry to production areas

Where no packaging materials for food contact or hygiene-sensitive products are manufactured and/or there is no risk of contamination to the packaging material or final product, the requirement for hand-washing facilities to enable staff and visitors to wash their hands before entry into production areas may be unnecessary. Hand-washing facilities should still be provided in toilet facilities and for general hygiene purposes as necessary within the factory.

This deviation should be included in the documented risk assessment and provided to the auditor upon request.

Clause 6.5.8 Personnel: protective clothing: defined process for home laundry

A site has issued protective clothing to staff based solely on identification of the department in which they work. A documented risk assessment has determined that the protective clothing poses no risk of contamination to raw materials and the intermediate and final products. The site permits home laundry of the protective clothing without the need for a defined process.

This deviation should be included in the documented risk assessment and provided to the auditor upon request.

Non-applicable clauses

Examples

Clause 4.2.2 Construction of suspended ceilings

Where a site building does not have suspended ceilings, this non-applicable clause should be agreed with the certification body prior to the audit and later verified by the auditor. This would not need to be included in the documented risk assessment.

Risk-based deviations and non-applicable clauses

Examples

Clause 4.6.3 Cleanliness and condition of wooden equipment

A site uses wooden equipment in the manufacturing of packaging materials. Where no food contact packaging materials are manufactured and/or the equipment presents no risk of contamination to the packaging material or final product, a documented risk assessment must be in place.

Where the site does not use wooden equipment in the manufacturing of packaging materials, the clause can be considered as non-applicable. It should be agreed with the certification body prior to the audit and later verified by the auditor. This would not need to be included in the documented risk assessment.

Preparation for the audit

Sites currently operating to the basic level of hygiene are advised to use this document, along with a self-assessment checklist and the interpretation guideline, to produce a gap analysis of the areas where the site needs to concentrate efforts to meet the requirements of the Standard.

The company seeking certification must conduct a hazard analysis and risk assessment which will establish a full description of the packaging material(s) and the intended use by the customer. Identifying potential hazards and establishing hygiene controls will enable the site to put in place the appropriate processes and procedures to meet the hygiene needs of the site that will ensure product safety, legality and quality.

Deviations from some of the requirements may be permitted based on risk; however, in each case an up-to-date documented risk assessment must be in place.

For additional support in preparation for audits against Issue 6 of the Standard, sites should contact their preferred certification body. For other enquiries, sites can contact the BRCGS at enquiries@brcgs.com

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