Position Statements

BRC/IoP Global Standard for Packaging and Packaging Materials – Issue 4

GLOBAL STANDARD FOR PACKAGING & PACKAGING MATERIALS

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Introduction

During the lifetime of a published Standard the BRC Technical committee may be asked to either review the wording of a clause in the Standard, provide an interpretation for a requirement or rule on the grading of non-conformity against a clause. Any such judgements are defined in position statements. Position statements are binding on the way that the audit and certification process shall be carried out and are an extension to the standard. This document contains a summary of the position statements for the BRC Global Standard for Packaging and Packaging Materials Issue 4 and is relevant for Certification Bodies.

Section A – General Position Statements

These position statements are not related to any specific clause or requirement, or to the protocol (audit and certification process), but are binding in how auditors shall approach the topics summarised.

Clarification on "absolute barrier" and determination of risk category

The purpose of the categorisation based on hygiene risk is to ensure that the requirements a site complies with are appropriate to the application of the packaging or packaging material. The applicable category is intended to be commensurate with the hazards that could potentially be presented to the consumer from the packaging or packaging material.

High hygiene risk category

The requirements relate to packaging factories producing packaging materials for products that require the highest hygiene standards during manufacture. They involve packaging that comes into direct contact with food products (or other designated hygiene-sensitive products*). This includes primary packaging used for food or other hygiene-sensitive products where no absolute barrier is in place.

*those products intended for human consumption or which come into contact with the body, such as application to the skin.

Low hygiene risk category

Requirements for the manufacturers producing packaging for consumer products and the secondary and tertiary packaging for all uses.

An absolute barrier should be considered as one where the risk of physical, chemical or microbiological contamination from the environment or packaging material itself into the product is eliminated. Traditionally speaking, absolute barriers are provided by glass and metal, and laminates are be considered as providing an absolute barrier **only** when they include an aluminium layer of sufficient thickness to prevent pinholing (typically 6 micron).

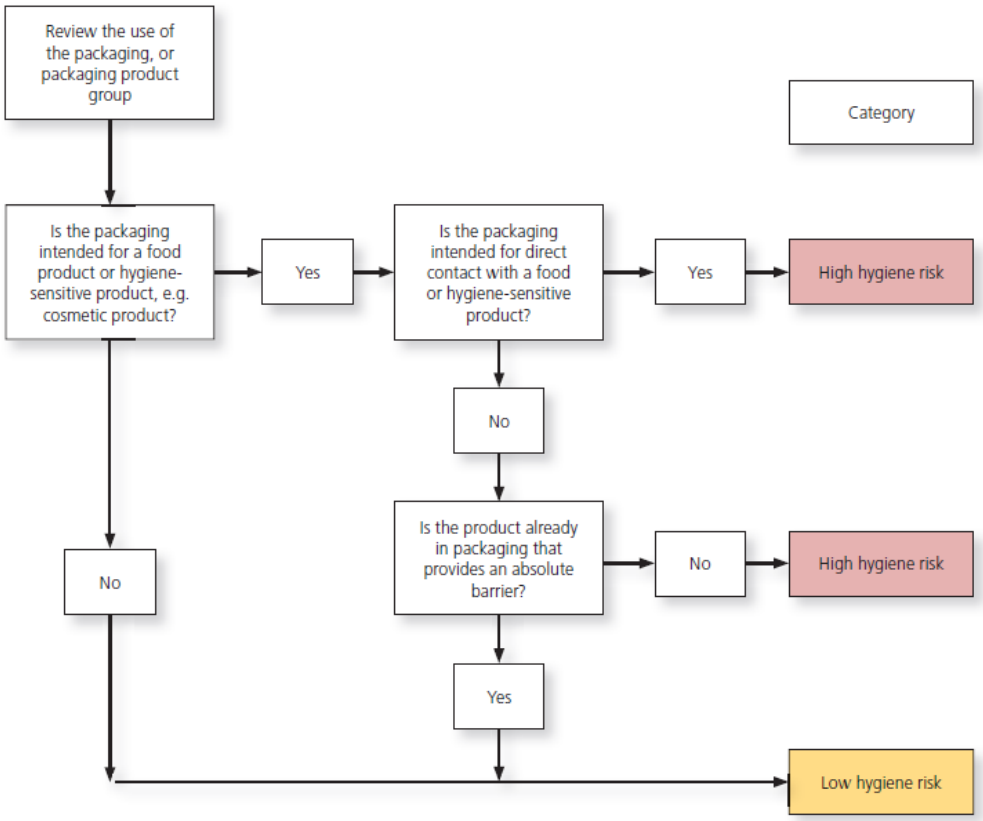
For the purposes of the Standard, this definition of 'absolute' barrier is extended to include functional barriers.

Where packaging used in direct contact with food or other hygiene sensitive products, is a functional barrier against microbiological or physical contamination, associated primary packaging, e.g. labels, shall be produced in manufacturing facilities meeting the requirements of the **low hygiene risk** category. This may include:

- Labels applied to direct food contact packaging materials, e.g. labels applied to a bag of fresh vegetables.
- Cartons used in the sales unit, e.g. a printed carton containing an inner plastic bag of breakfast cereal.

When using the decision tree, the question, "Is the product already in packaging that provides an absolute barrier?" shall be answered as 'yes' if the packaging is functionally effective against microbiological or physical contamination.

For items such as labels, the hazards from microbiological and physical contaminants to the consumer are minimal. However, there are potential hazards from chemical contaminants, such as inks.



Because of this vulnerability to chemical contamination, and for the purposes of maintaining conveyance of information through the supply chain, a Declaration of Compliance as set out in 3.7.3 (in the high hygiene risk requirements) shall be maintained for primary packaging, e.g. packaging that constitute the consumer unit where:

- The material falls into the low hygiene risk category

AND

- glass, metal or a laminate containing and aluminum layer of sufficient thickness to eliminate pinholing is **not** used as the direct food contact material.

Labels used directly on glass or metal primary packaging containers shall be regarded as being subject to the requirements of the low hygiene risk category only and shall not be required to maintain a declaration of compliance.

A printer manufactures thermal transfer labels for use on modified atmosphere (MAP) chilled butchery products. The direct food contact material is low-density polyethylene (LDPE) film and a polyethylene (PET) container.

During the development process for the labels, the customer requirements are considered, defined and agreed with specific regard to the specification and application of the packaging materials. It is determined that these materials are a functional barrier between the external and internal air composition, and microbiological and physical contamination. The label manufacturer will comply with the requirements of the low hygiene risk category and maintain a Declaration of Compliance.

A printer converts cartonboard for use with cereals, pasta, and ambient cakes and bakery products. The site's technical manager determines that they are subject to the low hygiene risk requirements and need to maintain a Declaration of Compliance for all of their cartonboard products.

An absolute barrier (glass, metal or aluminium laminate) is not in use as the direct food contact material, but functional barriers are used. Therefore the auditor would be satisfied that the site complies with the requirement for the low hygiene risk category and the requirement to maintain a declaration of compliance.

Corrugated boxes or trays, or moulded pulp containers for use in direct contact with any food shall be subject to the requirements of the low hygiene risk category where the food has a form of natural barrier; for example, bananas, oranges or eggs.

The site implementing the Standard should read carefully and understand the requirements applicable to them and note that many requirements are based on risk assessment in Issue 4 allowing the site to determine their own need for controls.

Sites complying with the low hygiene risk requirements should note that even though the requirements do not specifically require protective clothing such as snoods or hair covering, where the hazard and risk analysis highlights a need for protective clothing, it shall be worn.

Example

A site manufacturing corrugated cases for use in contact with fresh fruit such as bananas.

The risk assessment conducted by the site determines that as the application of the packaging is bananas, which have a natural barrier, the likelihood of human-borne foreign bodies contaminating the consumed product is minimal. Therefore the need for clean protective clothing (6.4.1 in the low hygiene risk requirements) is negligible. The requirement for protection of glass and brittle plastics (4.2.4 and 5.8.1.2), however, remains in place as glass or sharps contamination of the product or packed product may pose a hazard to the consumer.

A site manufacturing corrugated cartons for takeaway (hot) pizza.

The risk assessment conducted by the site determines that the duration of exposure between the hot, fatty food and the container is short but that physical contamination of the product by loose hairs is likely and decide that clean protective clothing should be worn in the finishing area, but not at the wet end of production. Sufficient separation and other controls are in place at the site to minimise the risk of cross contamination between the wet end and the conversion area.

Audit of New Sites

Manufacturing units that are **newly built** or **commissioned** must ensure that systems and procedures in place are compliant before an initial BRC audit is undertaken.

It is at the discretion of the company when they wish to invite a Certification Body to carry out an audit, however they must be able to demonstrate that systems and processes are established, compliant and monitored.

It is unlikely that full compliance can be satisfactorily demonstrated within a 3 month period from commencement of operation, as a sufficient period of production must have occurred in order for the auditor to observe that processes and procedures are in place, effective and being adhered to. A company may wish to consider a pre-assessment towards the end of this 3 month period.

However, some sites may be able to improve this timescale, such as a small site or those that are part of a group with established management systems.

With respect to a new production site within an established company, the site systems and procedures may reflect that systems already established with other sites within the company, but a full audit must establish compliance against BRC requirements for the new site.

Audit of Multiple Sites

The scope of a BRC audit needs to be agreed between the site and the certification body prior to the audit.

The audit, report and certificate shall be ‘product’ and ‘site’ specific. However, in some circumstances, more than one site may be included under a single certification. This will be considered exceptional but will be allowable under the following rules.

An audit and resultant certificate may cover multiple site addresses only where ALL of the following rules apply:

- all sites are under the same organisation ownership
- all sites are operated against the same documented quality management systems
- sites processing materials as part of the same manufacturing process
- the sites solely supply other sites within the group with no additional external customers
- sites must not be more than 50 miles / 80 km apart.

This is because audits and certificates are site specific and represent only the functions supplied by the supplier site.

If a site is intended to supply additional external customers, then this site must be certificated separately.

All sites must be visited and audited as part of the same audit schedule (ie within same timeframe).

The certification body’s audit plan needs to clearly show the sites that shall be audited.

It must be clearly stated on the certificate that the audit has consisted of visits to more than one site address. e.g. the manufacture by blowing of BOPP film at Polymer Industrial Estate, Bottlehampton, and reel slitting at Reelton Depot, Ripon.

It shall also be made clear on the audit report which points have been audited at which sites and also within the audit duration section under details for ‘reasons for deviation from target duration of 12 hours’ that more than one site has been visited since the auditing of multiple sites is likely to extend the audit requirement time.

Extension to Scope

Once certification has been granted, any additional significant products manufactured or processes undertaken by the site, which are required to be included in the scope of certification, must be communicated to the Certification Body. The Certification Body shall obtain information to evaluate the significance of these additional products or processes to assess the impact on scope of certification.

Revisit

A revisit is required before granting a scope extension where changes are made that bring significant new risks that are not met by existing management systems and controls. Examples of such circumstances include:

- The inclusion of manufacturing facilities not included within the original audit.
- The inclusion of a new processing technology e.g. printing by lithographic technology where formerly only flexographic printing was within scope.
- The inclusion of new products which introduce a significant new risk to the facility for example the addition of a solvent based ink to a previously solvent free site.

A revisit is less likely where:

- New products are extensions to the existing product ranges produced on existing equipment

Where an extension to scope is required shortly before the certificate is due to expire it may be more appropriate to undertake a full audit and issue a new certificate. This option should be agreed between the Certification Body and their client prior to undertaking the extension to scope audit.

Visit Duration

When a revisit is considered necessary the duration of this visit will vary depending on the aspects to be examined for the required extension to scope. The site visit should be conducted along the same principles as the original audit i.e. including an opening meeting, inspection of the operation of the process, documentation trails, closing meeting.

Non-conformities

Identified non-conformities should be documented and actioned within the normal protocol of the Standard. Ie the company has 28 days to provide appropriate evidence of close out and the certification body should review the information and confirm the certification decision in the normal manner. The additional non-conformities raised at the site visit will not affect the current certificated grade, or continued certification. However, if practices are seen that give the Certification Body cause to doubt continued certification eg the identification of a critical non-conformity then the Certification Body shall arrange a full reaudit of the site. In these circumstances the current certificate may be suspended or withdrawn.

Visit Report

A visit report should be documented, but should NOT be in the format of a standard BRC audit report. We would suggest a short explanation of the nature of the visit, what was audited and the conclusions should be given. The visit report should document what controls are in place and confirm the effectiveness of these controls. It should be clear in the report what aspects were looked at and what was excluded. An example is available from the BRC website.

Certificate

The sites current certificate will be superseded by any new certificate issued. The certificate must use the same expiry date as detailed on the original certificate. The due date of the next full audit will therefore remain the same and this should be made clear to the supplier by the certification body when arranging extension to scope visits.
The certificate should include an additional line of information:
'certificate reissue date (scope extension) xxxx as well as the date of audit specifying the visit date.

Auditing of activities managed by a group or head office located separately from the manufacturing site

Background

When undertaking audits of sites which are part of a larger manufacturing group it is not uncommon for some of the requirements within the scope of the standard to be undertaken by a central or head office. Typically this may apply to activities such as purchasing, supplier approval, product development, product recall and occasionally this extends to a group shared quality management system- document control and procedures.

It is a requirement of the BRC scheme that all requirements within the scope of the Standard must be assessed as satisfactory before a certificate can be issued. This requires that any centrally managed systems are included within the audit process. This position statement explains the alternative processes for achieving this. Auditing central office systems

There are 2 approaches to auditing the requirements which are managed at a central office

- Request and review information whilst at the manufacturing site as part of the site audit- Standard audit.
- Undertake a separate audit of the central managed processes at the Group/Head office location – Two stage audit

1. Standard audit - Requesting and reviewing information at the manufacturing site.

Recommended only where:

- Satisfactory links can be established with the central office
- Telephone or video conference to allow interview of relevant personnel
- Fax, E-mail links to allow documents to be requested and viewed
- Arrangements are in place to ensure availability of relevant personnel
- The amount and type of information can be effectively reviewed and challenged remotely

Note - Where a site elects for the information to be assessed during the manufacturing site audit and satisfactory information can not be provided during the audit, unsubstantiated requirements shall be recorded as non conformities on the site audit report.

1.1 Reporting

The audit report shall make it clear where a requirement is managed by a central office together with a comment on how the company complies with the requirement (see appendix 2).

1.2 Non conformities

Non conformities raised against a centrally operated requirement shall be recorded on the audit report and included within the count of non conformities contributing to the manufacturing site grade.

Corrective action shall be assessed in the same way as for non conformities raised at the manufacturing site and must be satisfactorily corrected before a certificate can be issued to the site.

1.3 Subsequent manufacturing site audits.

The central systems requirements shall be challenged and evidence of compliance be provided at each manufacturing site audit.

2. Two stage audits – Central systems and separate manufacturing site audit.

This approach is recommended where it is not practical to effectively assess requirements from the manufacturing site e.g.

- Practical arrangements to allow assessment cannot be provided
- There are too many centrally managed requirements to effectively review remotely.

This shall be offered to the company being audited and undertaken when requested by the company.

2.1 Stage 1 – Central system audit

The audit of the central systems should be completed before undertaking the manufacturing site audit.

The audit shall assess both how the central system complies with the relevant requirement of the standard and how this links to the manufacturing site operation. Reports for the Central system audit

The Certification Body may produce a report of the central system audit for the benefit of the company however as this audit will only include some of the requirements of the BRC standard:

- No grade may be allocated
- No certificate may be issued
- The report must be in a format which is clearly different from the full BRC audit report.

The central system report shall not be uploaded to the BRC Directory but the findings of the central system audit shall be incorporated into the final audit report of each of the associated manufacturing sites

Recording non conformities identified at the Central System audit
All non conformities identified at the central office audit shall be recorded on the audit report of the first manufacturing site audited following the central systems audit - irrespective of whether these have been closed out before that audit or not. However only those non conformities raised at the central office audit which have not been closed out to the satisfaction of the certification body at the time of the manufacturing site audit shall be counted when calculating the grade for the manufacturing site.

Any non conformities identified at the head office audit which are still outstanding at the time of further manufacturing site audits (2nd, 3rd etc) shall be included on that manufacturing site report and be included when calculating the grade for the site. (See worked example Appendix 1)

Closure of central systems corrective actions
Corrective actions required following the central office audit shall be assessed in the same way as corrective actions raised at the manufacturing site and must be satisfactorily corrected before a certificate can be issued to the manufacturing sites. This may be by documentary evidence or a revisit as appropriate.

2.2 Stage 2 - Audits of the manufacturing site(s)
Information from the central office audit (including any evidence of corrective actions taken) shall be made available to the auditors of the associated manufacturing sites by the certification body. The auditor shall establish that the central systems components assessed are the same as those operating at the manufacturing site. The auditor shall verify any corrective actions already taken following the central systems audit.

Audit duration
It may be possible to reduce the duration of the manufacturing site audit to take account of systems already audited at a central office.

The BRC Audit report
The final audit report shall be applicable to the manufacturing site. The central office audit shall be commented upon in the Company Profile e.g. “An audit was carried out at the central office at ……. on the …… to assess requirements as indicated in the report”

The Key Personnel may include the names of key staff present at the central office audit.

The manufacturing site(s) audit report shall include information about how both the site and the central system complies with the requirements of the standard. The report shall indicate where a requirement is managed by a central office together with an explanation of how that requirement is satisfied (see Appendix 2).

Corrective action
The 28 days allowed for evidence of corrective action to be provided starts from the date of the manufacturing site audit. It is the responsibility of the site to ensure that head office corrective actions have been provided to the certification body in order to allow the site to become certificated. This will

require effective communication with the central systems office. There is no limitation on the period of time that may elapse between the head office audit and the manufacturing site audits, but they must occur in the same period of Certification and arranged to maintain Certification in compliance with clause 1.2.8.

Where central systems corrective actions have been accepted by the Certification Body prior to any manufacturing site audit this shall be indicated on the first manufacturing site audit report and the date of acceptance of the action indicated in the "action taken" section of the non compliance report. The non-conformities raised in the central systems audit shall be noted, but shall not be counted when calculating the grade for the manufacturing site.

Certificate
The Certificate where awarded is issued to the manufacturing site.

Re-audit date
The re- audit date for the manufacturing site is based on the Grade achieved and shall be 6 or 12 months from the initial audit date. The central office audits shall be carried out every 12 months and shall occur before the anniversary of the audit of the first manufacturing site. Usually there will be several manufacturing sites associated with a central system. The information from the annual central system audit shall be used for each subsequent manufacturing site audit.

Further information
The BRC shall be contacted for advice before carrying out audit programs for more complex arrangements of sites and centralised systems contact.
See appendix 1 for an illustration of reporting Non conformities and Grading - 2 stage audits
See appendix 2 for an example of reporting requirements covered by a central office

Calculating Audit Duration

The BRC have developed this audit duration calculator with the BRC Technical Advisory Committee and a working group of Certification Bodies in order to provide a more transparent and consistent approach to establishing audit duration. In accordance with the calculator and current practice the typical audit duration shall be 1.5 days of which a minimum of 3 hours shall be spent auditing the production environment.

The audit calculator shall be used as the basis for allocating audit duration for all audits booked from the 1st of January 2012 and for all audits undertaken from the 1st of April 2012.

The audit duration calculator is based on:

- Number of employees – as full time equivalent employees per main shift including seasonal workers.
- Size of the manufacturing facility - including storage facilities on site
- The number of Hazard and Risk Analysis studies included within scope – A Hazard and Risk Analysis study corresponds to a family of products with similar hazards and similar production technology for the purpose of the calculator

The other factors identified in the standard (see appendix 1) may influence the calculation but are considered to be less significant. These other factors shall not influence the audit duration by more than 30% from the total calculated audit duration.

Table of audit duration

	Audit duration in days based on 1-3 HARM studies			Corresponding minimum time within production environment in hours		
	Size of manufacturing facility					
Nº employees	<10 K sq.m	10K-25K sq.m	>25K sq.m	<10 K sq.m	10K-25K sq.m	>25K sq.m
1 - 50	1.0	1.5	1.5	1.5	3	5
50 - 500	1.5	2.	2.5	3	5	7
500 - 1500	2.0	2	2.5	4	7	7
> 1501	>2	2.5	3	5	7	8

Typical Site

Time allocation for additional Hazard and Risk Management Studies

Additional studies	Additional days to total audit duration	Additional time within the production environment
4 – 8 Studies	0.5	2 hours
>9 Studies	1	4 hours

It is recognised that the audit of a site against the requirements of the standard will involve both time spent within the production environment and time spent reviewing records and procedures within an office.

It is expected that wherever practicable, evidence should be gathered within the production environment through interviewing staff, observing working practices and reviewing process controls and records. At a typical audit of 2 days duration on site 30-50% of the total audit duration i.e. minimum of 3 hours should be spent within the production environment.

Where the audit duration is increased in line with the size of the site it is expected that additional time will be spent within the production environment.

See Appendix 3 for other factors which may influence audit duration.

The company profile section of the audit report shall include the information needed to calculate the audit duration i.e. number of employees and size of the factory. The detailed section of the audit report should provide an outline of the product types manufactured and the number of hazard and risk analysis studies in place.

Justification shall be given where either the total audit duration or time spent within the factory varies from the calculated values according to this procedure.

4.1 Recording audit duration

On site audit duration should be stated in man hours (whole number e.g. 17 not 16.5) giving the total time at the site conducting a BRC audit (including time in production). Where a combination of audits has been undertaken e.g. BRC and ISO22000, then a calculation for the total time taken for the BRC audit only should be stated.
Similarly, where the audit has been undertaken by an audit team, then the time should be specified as the total man hours spent on the audit e.g. 2 auditors spending one 8 hour day on site = 16 man hours.
The total hours shall not include any calculation for writing of the final audit report away from site. This is additional time and is typically 4 – 8 man hours.

Duration of production facility audit should be stated in man hours (whole number e.g. 6 not 5.5) giving the total time (man hours) that has been spent in the production environment. This should be part of the site audit time and not additional to it.

Section B – Requirements

Section 1 – Senior Management Commitment and Continual Improvement

1.2.7 Presence of a copy of the Standard at the site

The grading of non-conformities regarding availability of copies of the Global Standard for Packaging and Packaging Materials will be allocated as follows:

Minor	Where a site is using a photocopy of the Standard (the Standard is a copyright protected document).
Major	Where the site cannot show that they have a copy of the Standard.

Note that Standards are available in hard copy (printed) or as a downloadable PDF which can be shared across company intranet or printed once.

1.2.8 Clarification on Delayed audits

1.2.8	"Where the company is certificated to the Standard they shall ensure that recertification audits occur on or before the audit due date indicated on the certificate."

Where audits are delayed beyond the 28 day window up to and including the next audit due date without a justifiable reason a Major non conformity shall be raised.

Justifiable Reasons

There will be some circumstances where the certificate cannot be renewed at the required frequency due to the inability of the certification Body to conduct an audit within the appropriate time frame. These circumstances can include:

the site is situated in a specific country or an area within a specific country where there is government advice not to visit and there is no suitable local auditor
the site is within a statutory exclusion zone
the site is in an area that has suffered a natural or unnatural disaster, rendering the site unable to produce

It is not a justifiable reason to delay audits where sites are not in full production; however audits must be undertaken whilst there are products are being manufactured, therefore the following are also justifiable reasons.

- sites undertaking a major overhaul of a sole piece of equipment, e.g. the dismantling and rebuild of a glass furnace.
- sites that shut down for a period

Moving the audit date to a more 'acceptable' date for reasons of combining audits, lack of personnel or undertaking building work is not an acceptable reason for missing the due date.

The non-conformity cannot be avoided by the client moving to another Certification Body.

Justified reasons should be agreed between the Certification Body and client prior to any delay with audit booking and notified and agreed by the BRC

Exceptional circumstances that are not included within situations already stated above must be clarified in advance with BRC.

Guidance on enforcement

At the discretion of the Certification Body, we would suggest that where the delay is no more than 1 week (7 calendar days) after the next audit due date no non conformity is raised. Beyond this point a Major non conformity must be raised against the site.

Requirement 1.2.8 **does** apply to the first audit of sites against issue 4 of the Standard where the site holds an existing BRC Certificate for issue 3. This is because the BRC protocol for issue 4 makes the obligations to maintain certification quite clear.

Sites with Lapsed certificates re-entering the Certification Scheme.

Where certificates have lapsed for more than 6 months re-entry to the BRC Certification scheme will be considered as a new application and the clause 1.2.8 will not apply. Evidence should be provided that customers have not been supplied with product in this period that requires the site to be certificated.

There will be other exceptional circumstances where sites can be classed as new applicants or clause 1.2.8 will not apply for example:

- Where a lapsed site is taken over by a new company.

Section 2 – Hazard and Risk Management System

No position statements.

Section 3 – Product Safety and Quality Management Systems

No position statements.

Section 4 – Site Standards

4.11 – Pest control

Guidance was requested to ensure consistency in the grading of non-conformities where evidence of pests was identified at an audit. The following criteria should be used:

Minor
Where slight evidence of an infestation is found resulting from a casual intruder - i.e. instances of pest ingress of a single occasion or low numbers occur and are appropriately investigated and actioned.

Major
Any established infestation – i.e. where large numbers of pests are breeding within the building or site over a period of time. This implies a failure of the pest control and inspection measures and should be regarded as a loss of control and lack of maintenance.

Critical
Wherever the presence of an established infestation puts product or ingredients at risk of contamination.

Section 5 – Product and Process Control

5.2 – Packaging print control

The clauses concerning printed packaging in the Standard are intended to protect the consumer through ensuring integrity of safety, legal and allergen information, and to ensure the customer's

requirements for any printed information meets the required quality. Should printed information not contain safety, legal or allergen information, these requirements shall still apply.

Information on packaging materials may also be imprinted. Imprinting refers to: debossing, embossing or forming in the mould used to make the materials, but not to printing by conventional means, e.g. flexo, litho, gravure, etc. Examples could include:

- Embossed or debossed pulp products, such as egg cartons
- Embossed or debossed glass containers
- Embossed or debossed aluminium or steel containers
- Any pack or packaging material with any information conveyed in braille
- Any pack or packaging material with tactile warnings
- Embossing or debossing on expanded polystyrene (EPS) packaging materials
- Hot or cold foil stamping on any pack or packaging materials
- Food service packaging materials, such as hot beverage container/cup lids

Where information on packaging or packaging materials is conveyed using these means, the requirements as set out in 5.2 shall apply.

Sites shall ensure that systems are in place to ensure that printed and imprinted information is legible and printed correctly, meeting the customer's requirements and maintaining the quality and legality of the product.

The site should also be aware that where trademarks are printed or imprinted onto the materials, then consideration should be given to the relevancy and implementation of clauses:

- 2.2.4 (process flow including art work into the hazard and risk management system process flow);
- 3.7.4 (formal agreement of use of trademarks on packaging);
- 4.10.3 (disposition of substandard trademarked materials);
- 4.10.4 (records of destruction of trademarked materials);
- 5.3.1 (inclusion of the printing – or imprinting – process into process control).

Section 6 – Personnel

No position statements.

Section C – Protocol

Guide to re-audit timescale following awarding of a Grade D

The following combinations of non-conformities result in the awarding of a grade D where no certificate is issued.

Grade	Critical or major nonconformity against the 'statement of intent' of a fundamental clause	Critical	Major	Minor
D	1 or more			
D		1 or more		
D			3 or more	
D			2	21 or more
D			Fewer than 2	31 or more

Where a Grade D has been awarded a full re-audit must then be carried out to gain certification.

The company should be made fully aware of the need to ensure that there must be significant, demonstrable evidence that the requirements have been met and the underlying root causes of previously identified issues have been effectively addressed before commissioning the new audit.

The site shall be required to undergo a new initial audit and the date of certification shall not be related to any previous certification.

Due to the nature and number of non-conformities, it is not typically anticipated that the new audit can take place within 28 days of the non-certificated audit, but accepted that in some few cases the non-conformities can be satisfactorily resolved within this timescale.

Guideline for defining wording of scope

It is important that the wording used to describe the scope of certification is clear and without any ambiguity. The following provides guidance of the types of descriptions to use and examples of the words to be used.

The scope should include a general outline of the **process**, the **material types** and the differentiation of characteristics such as usage.

The Process

There should be a general outline of the process, it is suggested using appropriate words from the following (not an exhaustive list):
blow and blow, press and blow, extrusion blow moulding, injection stretch blow moulding, induction heat sealing, press and blow, narrow neck press and blow, flexo printed, litho printed, gravure printed, screen printed, tampo printed, offset printed, letterpress printed, laminated, extruded, co-extruded, draw-and-wall-ironed (DWI), draw-and-redraw (DRD), three-piece can, two-piece can etc.

There should be a general outline of the material and the nature of the material being produced, it is suggested using appropriate words from the following (not an exhaustive list):
flint glass, amber glass, green glass, polyethylene terephthalate (PET), recycled polyethylene terephthalate (rPET), polyethylene glycol (PETG), polyvinylchloride (PVC), polypropylene (PP), polyethylene (PE), high-density polyethylene (HDPE), low-density polyethylene (LDPE), styrene-acrylonitrile (SAN), corrugated board, paper, paperboard, cartonboard, aluminium, steel, multi-layer laminate (stating materials used in the laminate), adhesives, post consumer recyclate (PCR), kraft (or virgin), test (or recycled),

Use of general terms such as '*manufacture', 'production', 'preparation'*, or *'processing'* should be used with care but may be acceptable where the resultant products are clear.

Use of the words, *procurement, intake, receipt, storage, product design and development, handling, storage, dispatch, transport* is not required since they are already included within the scope of the Standard and are assessed during the audit.

Use of words such as *sales, marketing, trade, distribution* and *delivery* are NOT permitted because these are outside the scope of the Standard.

Scope	"manufacture of plastic bottles" ✗ *not acceptable. It is unclear what the process of 'manufacture' is, the nature of the plastic and the intended use of the packaging material.*
Scope	"narrow-neck press and blow of flint glass bottles for use with soft drinks" ✓ *acceptable as it is clear as to the process of manufacture, the material used, and the intended use of the packaging material.*

Product Types

Products should be 'grouped' or words used to clearly define recognisable and international understandable product types. General terms such as 'plastics'should include clarification of the types of material as stated above.

Remember the words used can form the basis of a Directory search by a potential customer looking for a BRC certificated supplier.

Refer to Appendix 4 of the Standard 'product categories' and 'product examples' as a guide to suitable descriptions.

Exclusions
Where there are no exclusions, then 'none' shall be specified.
If the site also sells or uses packaging items or materials bought in from other manufacturers ie 'factored goods', then this should be specifically mentioned as an exclusion.

The exclusion of products produced at a site will only be acceptable where the excluded products can be clearly differentiated from products within scope and make up a minority of the products produced at the site and:

- the products are produced in a separate area of the factory
  or
- the products are produced on different production equipment, e.g. products packed in glass jars in a cannery.

Exclusions therefore need to be clearly explained and acceptable. Examples:

Scope	"the printing by litho and die-cutting of cartonboard"
Exclusions	"insertion of plastic windows into printed and die-cut cartonboard"
	✗ The process is not clearly distinguishable and is critical to the quality and safety of the packaging material.

Scope	"The extrusion blow moulding of high density polyethylene (HDPE) bottles for use with fresh milk"
Exclusions	"the re-packing of HDPE bottles in the warehouse for local customers"
	✓ The process is clearly distinguishable and completed in a separate area of the site by a dedicated team

General Principles
The same scope wording must be used on the certificate and on the audit report.

Audits undertaken prior to due dates

The due date of renewal audits occur within a 28 day window prior to the 12 month anniversary of the initial audit, i.e. between month 11 and 12. Where a C grade has been applied the due date of renewal audits occur within a 28 day window prior to the 6 month anniversary of the initial audit, i.e. between month 5 and 6.

In some circumstances it is possible to undertake the audit earlier than these due dates, for example to reset the audit dates to allow combined audits with another scheme. Where an audit date is brought forward the following rules will apply:

- The audit report will detail the reasons why an audit has been brought forward
- The audit due date will be 'reset' to be 12 months (or 6 months depending on grade) from this audit date
- The certificate should be issued with an expiry date of 12 months (or 6 months depending on grade) + 42 days from the 'new' audit date.
- Under no circumstances should a certificate have a validity of more than 12 months.

Appendix 1 Illustration of reporting Non conformities and Grading - 2 stage audits

The following worked example illustrates how non conformities from the head office should be recorded and counted towards the grade of the subsequent manufacturing site audits.

At a central systems audit carried out on 01.06.2012 the following non conformities were identified and subsequently corrective action was received and closed out on the dates illustrated.

Non conformity	**Date of closure**
No 1.Major	15.6.2010
No 2 Minor	15.6.2010
No 3 Minor	15.6.2010
No 4 Minor	15.6.2010
No 5 Minor	10.7.2010
No 6 Minor	10.8.2010
No 7 Major	10.8.2010
No 8 Minor	18.8.2010

Assuming that all non conformities identified at the manufacturing site audits were satisfactorily close out within 28 days of the audit, then the site audit reports would include the following central systems non conformities and would be graded as illustrated below.

Manufacturing Site	Site audit date	Non Conformities at the site	Non conformities (n/c) carried forward from central system audit		Total number of non conformities on final report counting for grade	Grade
			n/c included on report	n/c counting towards grade		
Site 1*	20.6.2012	8 minor	2 major, 6 minor	1 major, 3 minor	1 major, 11 minors	C
Site 2	21.7.2012	8 minor	1 major 2 minor	1 major 2 minor	1 major, 10 minors	B
Site 3	12.8.2012	8 minor	1 minor	1 minor	9 minor	A
Site 4	30.9.2012	8 minor	None	None	8 minor	A

* first manufacturing site audit following central system audit

Appendix 2 Example of reporting requirements covered by a central office

3.9 Traceability		FUNDAMENTAL	
SOI	The company shall have a system in place to identify product batches and to trace and follow all raw materials through processing to distribution of the finished product to the customer. Records shall be retrievable in a timely manner.	**Y**	Centrally managed Documented ref PR05677 (version 3, 22.01.12) describes process and present on site
3.9.1	The company shall have a system that has the ability to trace and follow all raw materials from the supplier through all stages of processing to distribution of the finished product and vice versa. Where continuous processes are used or raw materials are in bulk, the traceability of silos shall be achieved to the best practical level of accuracy.	**Y**	Centrally managed. All aspects covered in Recall and incident procedure. A copy of the procedure s available at site. Updating and management at central office.
3.9.2	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.	**Y**	Centrally managed. Batch codes allocated based on day of production. Fully traceable from raw material intake (and supplier) to customer. Forwards and backwards traceability possible through group network (intranet) for products on all sites.
3.9.3	The system shall be tested to ensure traceability can be determined from raw material to the finished product and vice versa. This shall take place on a predetermined frequency, at least on an annual basis, and results retained for inspection.	**Y**	Schedule is managed centrally. Last traceability test undertaken 19/11/11, full traceability achieved on product manufactured 6 months previously. Results of tests are shared in the group to facilitate continuous improvement.

Appendix 3

Other factors which may influence audit duration

Factors which may influence the duration of the audit are:

- numbers of locations, with separate offices, manufacturing or storage sites
- complexity of the manufacturing process
- number of product lines
- size and age of site and impact on material flow
- labour-intensity of processes
- communication difficulties, e.g. language
- the number of non-conformities recorded in the previous audit
- difficulties experienced during the audit requiring further investigation
- the quality of company preparation, e.g. documentation, HACCP, QMS
- initial audit