



GFSI TECHNICAL EQUIVALENCE
GFSI GUIDANCE DOCUMENT VERSION 7.2

PART III - *M* **PRODUCTION OF FOOD PACKAGING**

Part III - *M* Production of Food Packaging

Certification Programme Scope and Key Elements

This section is the third part of the GFSI Benchmarking Requirements, which has been developed and published by the Global Food Safety Initiative (GFSI) to specify the requirements for the recognition of food safety Certification Programmes.

The objective of **Part III – M – Production of Food Packaging** is to define:

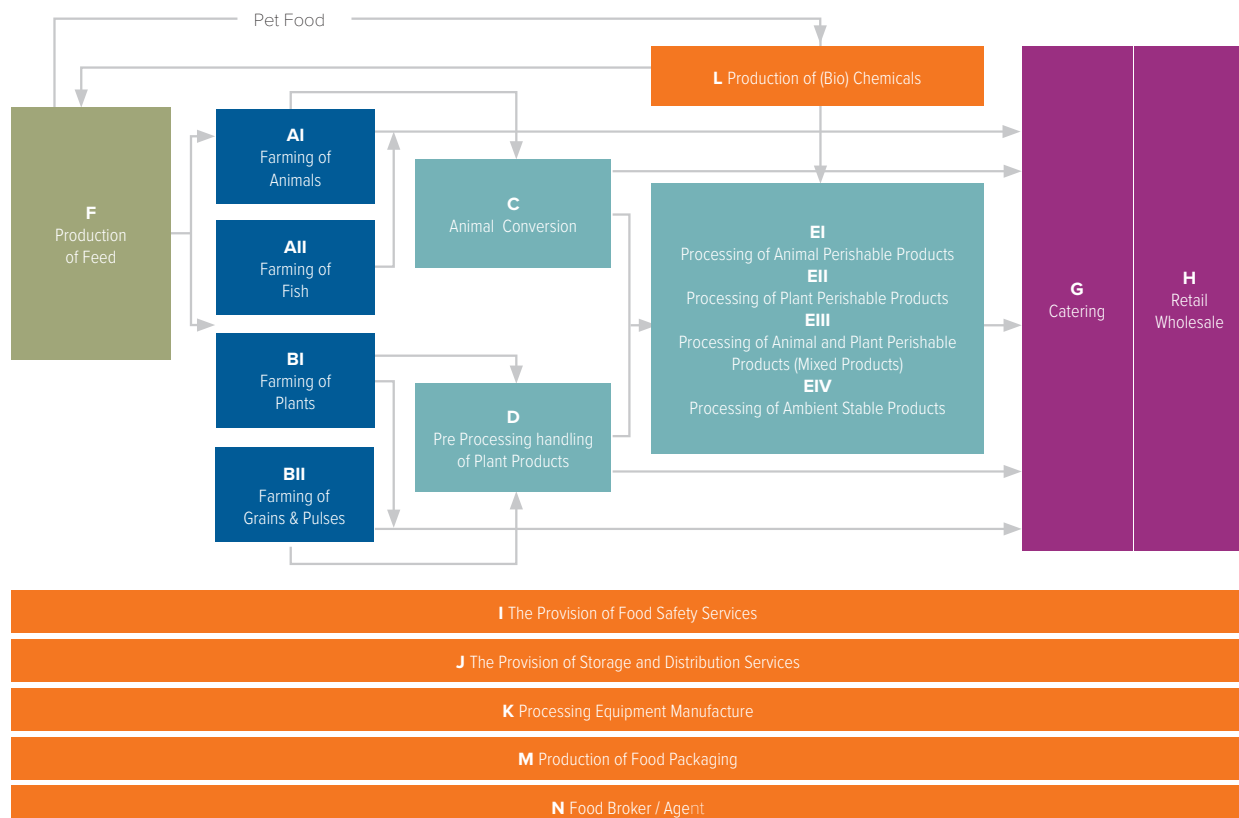
- the requirements for the Food Safety Management Systems to be in place in the Certification Programme's standard for GFSI scope of recognition **M – Production of Food Packaging**,
- the requirements for the Good Practice requirements to be in place in the Certification Programme's standard for GFSI scope of recognition **M – Production of Food Packaging**,
- the requirements for Hazard Analysis and Critical Control Points (HACCP) or HACCP based

requirements to be in place in the Certification Programme's standard for GFSI scope of recognition **M – Production of Food Packaging**.

GFSI scope of recognition **M – Production of Food Packaging** includes the following products, services, or methods of production:

- Production of food and feed packaging, packaging materials, packaging components in the form of raw materials, part processed, semi-converted, converted or fully finished packaging materials and products for use in the supply chain.

GFSI has worked closely with food industry experts to clearly define the requirements that shall be in place to provide food safety assurance in specific sectors of the food industry and for organisations providing services to the food industry. Although the principles



are the same, these requirements differ from sector to sector of the food supply chain.

A Certification Programme's standard and other guidance shall provide sufficient detail to ensure that the GFSI requirements in the following tables are met and that, within the benchmarking process, objective evidence of compliance can be found. The requirements for individual Certification Programme standards must be independently developed based on industry practice and it is not expected that a Certification Programme's standard shall be a direct copy of the GFSI requirements.

GFSI expects all benchmarked Certification Programmes to meet the Food Safety Management, Good Industry Practice, and HACCP requirements for the applicable sectors outlined in Part III.

However Certification Programmes requiring Certifica-

tion Bodies to operate to ISO / IEC 17021-1 must also ensure that they meet or exceed the requirements of ISO 22000.

For those Certification Programmes, where there is any divergence between the requirements of the GFSI Benchmarking Requirements and ISO 22000, the requirements of ISO 22000 shall prevail.

Certification Programmes requiring Certification Bodies to operate to ISO / IEC 17065 shall meet the requirements for applicable sectors outlined in Part III.

The following sections and tables identify the GFSI requirements for this scope. Certification Programme Applicants must ensure that all requirements are considered for all scopes included in the application. This may include requirements from more than one Part III document.

SECTION 1: HACCP OR HAZARD BASED REQUIREMENTS

Table I: HACCP Requirements

SECTION 2: FOOD SAFETY MANAGEMENT REQUIREMENTS

Table I: Food Safety Management Requirements

SECTION 3: GOOD INDUSTRY SECTOR PRACTICE REQUIREMENTS

Table I: Good MANUFACTURING Practice Requirements

SECTION 1: HACCP OR HAZARD BASED REQUIREMENTS

Table I: HACCP Requirements

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
HACCP M 1.1	Hazard and Risk Management System	The standard shall require that the organisation has a Hazard and Risk Management System in place including prerequisite programmes. This may be a HACCP based system or another hazard and risk management system that covers the Codex Alimentarius HACCP principles.

HACCP M 1.2

Hazard and Risk
Management
System

The standard shall require that the scope of the Hazard and Risk Management System shall cover all processes of the materials encompassed within the standard to ensure that none of their component parts or the whole material could compromise food safety.

SECTION 2: FOOD SAFETY MANAGEMENT REQUIREMENTS

Table I: Food Safety Management Requirements

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
FSM M 1.1	Food safety management for packaging materials - general requirements	The standard shall require that the elements of the organisation's Food Safety Management System for packaging materials be documented, implemented, maintained and continually improved.
FSM M 1.2	Food safety management for packaging materials - general requirements	The management system shall ensure that packaging used to impart or provide a functional effect on food such as shelf life extension shall, where known, be effective within its own specified criteria.
FSM M 1.3	Food safety management for packaging materials - general requirements	The management system shall validate packaging design and development to ensure food safety and legal manufacture.
FSM M 2	Policy statement	The standard shall require the organisation to have a clear, concise and documented food safety policy statement and measurable objectives specifying the extent of the organisation's commitment to meet the safety needs of its products.
FSM M 3	Documented system	The standard shall require the organisation to have a food safety manual or documented system having a scope appropriate to the range of business activities to be covered, including documented procedures or specific reference to them.

FSM M 4	Management responsibility	The standard shall require that the organisation establishes a clear organisational structure, which unambiguously defines and documents the job functions and responsibilities of at least those employees whose activities affect food safety.
FSM M 5	Management commitment	The standard shall require that the organisation's senior management provides evidence of their commitment to establish, implement, maintain and improve the Food Safety System.
FSM M 6.1	Management review	The standard shall require that the organisation's senior management review the verification of the Food Safety System, HACCP plan or HACCP based plans, at planned intervals, to ensure their continuing suitability, adequacy and effectiveness.
FSM M 6.2	Management review	The standard shall require that the HACCP plan and food safety programmes (or prerequisite programmes) shall also be reviewed in the event of any change that impacts food safety. Such a review shall evaluate the need for changes to the Food Safety System, including the food safety policy and food safety objectives.
FSM M 7	Resource management	The standard shall require that the organisation's senior management determines and provides, in a timely manner, the qualified resources (including suitably qualified personnel) needed to implement, maintain, review and improve the Food Safety System for packaging materials.
FSM M 8.1	General documentation requirements	The standard shall require that documentation procedures are in place to demonstrate compliance with the standard.
FSM M 8.2	General documentation requirements	The standard shall require that documentation procedures are in place to ensure that all records required to demonstrate the effective operation and control of its processes and the management of food safety are securely stored.
FSM M 8.3	General documentation requirements	The standard shall require that the documentation procedures described under FSM M 8.1 and FSM M 8.2 are securely stored for the time period required to meet customer or legal requirements, effectively controlled and readily accessible when needed.

FSM M 9.1	Specified requirements	The standard shall require that the organisation ensures that documented specifications are prepared, maintained, securely stored and readily accessible when needed for all inputs to the process, items and services (including utilities, transport and maintenance) that are purchased or provided and have an effect on product safety.
FSM M 9.2	Specified requirements	The standard shall require that a specification review process is in place.
FSM M 10	Procedures	The standard shall require that the organisation establishes, implements and maintains documented and detailed procedures and instructions for all processes and operations having an effect on food safety.
FSM M 11	Internal audit	The standard shall require that the organisation has an internal audit system in place to cover the scope of the Food Safety Management System for packaging materials.
FSM M 12	Corrective action	The standard shall require that the organisation has procedures in place for the determination and implementation of corrective action in the event of any significant non-conformity relating to food safety.
FSM M 13	Control of non-conformity	The standard shall require that the organisation has effective and documented processes in place to ensure that any packaging material which does not conform to food safety requirements is clearly identified and controlled to prevent unintended use or delivery.
FSM M 14	Product release	The standard shall require that the organisation prepares and implements appropriate product release procedures.
FSM M 15.1	Purchasing	The standard shall require that the organisation controls the supply management processes to ensure that all externally sourced materials and services which have an effect on food safe packaging materials, conform to specified and regulatory requirements including food fraud mitigation plan requirements.
FSM M 15.2	Purchasing	The standard shall require that where an organisation chooses to outsource any process that may have an effect on food safety, the organisation shall ensure control over such processes.

FSM M 15.3	Purchasing	The standard shall require that control of outsourced processes that may have an effect on food safety are identified and documented in the food safety system.
FSM M 15.4	Purchasing (non-approved supplier)	Use of non-approved suppliers shall be acceptable in an emergency situation provided the facility has been assessed and the product meets the specification.
FSM M 16	Supplier performance	The standard shall require that the organisation establishes, implements and maintains documented procedures for the evaluation, approval and continued monitoring of suppliers that have an effect on food safety through the packaging manufacture, storage, transportation and potential use. The results of evaluations, investigations and follow-up actions shall be recorded.
FSM M 17	Complaint handling	The standard shall require that the organisation establishes, implements and maintains an effective system for the management of complaints and complaint data in order to control and correct shortcomings in food safety.
FSM M 18	Serious incident management	The standard shall require that the organisation establishes, implements and maintains an effective incident management procedure, which is regularly tested for all products it supplies and covers planning for product withdrawal and product recall as required.
FSM M 19.1	Control of measuring and monitoring devices	The standard shall require that the organisation identifies the equipment used to measure parameters critical to ensure food safety.
FSM M 19.2	Control of measuring and monitoring devices	The standard shall require that the organisation identifies the required monitoring of measuring devices critical to ensure food safety.
FSM M 19.3	Control of measuring and monitoring devices	The standard shall require that the organisation identifies methods to assure that the calibration of these measuring and monitoring devices is traceable to a recognised standard or method.
FSM M 20.1	Food defence threat assessment	The standard shall require that the organisation have a documented food defence threat assessment procedure in place to identify potential threats and prioritise food defence measures.

FSM M 20.2	Food defence plan	The standard shall require that the organisation has a documented plan in place that specifies the measures the organisation has implemented to mitigate the public health risks from any identified food defence threats.
FSM M 20.3	Food defence plan	The standard shall require that the organisation's food defence plan and shall be supported by the organisation's Food Safety Management System.
FSM M 21	Food fraud vulnerability assessment	The standard shall require that the organisation has a documented fraud vulnerability assessment procedure in place to identify potential vulnerability and prioritise fraud mitigation measures.
FSM M 22.1	Food fraud mitigation plan	The standard shall require that the organisation has a documented plan in place that specifies the measures the organisation has implemented to mitigate the public health risks from the identified fraud vulnerabilities.
FSM M 22.2	Food fraud mitigation plan	The standard shall require that the organisation's fraud mitigation plan and shall be supported by the organisation's Food Safety Management System.
FSM M 23.1	Traceability	The standard shall require that the organisation establishes, implements and maintains appropriate procedures and systems to ensure the ability to trace or follow a material or article through all stages of manufacture, processing and distribution.
FSM M 23.2	Traceability	The standard shall require that the organisation establishes, implements and maintains appropriate procedures and systems to ensure identification of any outsourced product, inputs or service related to food safety.
FSM M 23.3	Traceability	The standard shall require that the organisation establishes, implements and maintains appropriate procedures and systems to ensure that the product identification enables traceability to the producer.
FSM M 23.4	Traceability	The standard shall require that the organisation establishes, implements and maintains appropriate procedures and systems to ensure that a record is kept of purchaser and delivery destination for all products supplied. This refers to one step forward and one step backward as a minimum.

FSM M 23.5	Traceability	The standard shall require that the organisation establishes, implements and maintains appropriate procedures and systems to ensure identification of recycled materials and any other materials, from whatever source, that may give rise to food safety issues.
FSM M 23.6	Traceability	The standard shall require that the organisation establishes, implements and maintains appropriate procedures and systems to ensure that the traceability shall be timely and information produced shall be accurate.
FSM M 23.7	Traceability	The standard shall require that the organisation establishes, implements and maintains appropriate procedures and systems to ensure that the traceability shall include the material source (one stage back), throughout all production processes, on to internal and external warehousing and the customer (one stage forward).
FSM M 24.1	Packaging material testing	The standard shall require that where external product testing is required it shall be carried out by an accredited test facility or one that follows international test facility guidelines.
FSM M 24.2	Packaging material testing	The standard shall require that where in-house testing is carried out, calibration of equipment shall be carried out against national standards or other accurate means.
FSM M 25	Environmental monitoring	The standard shall require that a risk-based environmental monitoring programme be in place.
FSM M 26	Food safety legislation	The standard shall require that the organisation establishes, implements and maintains detailed procedures and instructions for all processes and operations having an effect on food safety to be compliant in the country of manufacturing as well as the country of known destination.

SECTION 3: GOOD INDUSTRY SECTOR PRACTICE REQUIREMENTS

Table I: Good Manufacturing Practice Requirements

CLAUSE NUMBER	CLAUSE NAME	REQUIREMENTS
GMP M 1.1	Facility environment	The standard shall require that the site or facility shall be located and maintained to prevent contamination of the packaging materials and enable the production of safe products.
GMP M 1.2	Facility environment	The standard shall require that the manufacturing process is controlled throughout in order to ensure that the packaging material produced is food safe.
GMP M 2	Local environment	The standard shall require that all grounds within the site or facility shall be maintained to an appropriate standard.
GMP M 3	Facility design, construction, layout and product flow	The standard shall require that premises, site and / or plant shall be designed, constructed and maintained, both exterior and interior, to control the risk of packaging material contamination.
GMP M 4	Fabrication including raw materials intake, manufacturing process, storage and despatch.	The standard shall require that the fabrication of the site, buildings and facilities is suitable for the intended purpose.
GMP M 5	Equipment	The standard shall require that equipment is suitably designed and selected for the intended purpose and be used and stored so as to minimise further food safety risks from packaging materials.
GMP M 6	Maintenance	The standard shall require that a system of planned maintenance is in place covering all items of equipment, which is used to produce food safe packaging.
GMP M 7.1	Employee facilities	The standard shall require that employee facilities, such as toilets, lunch facilities, changing / locker rooms are designed and operated to minimise food safety risks.
GMP M 7.2	Employee facilities	The standard shall require employee and visitor access definitions and include visitor and contractor control.

GMP M 8	Product contamination risk	The standard shall require that appropriate facilities and procedures are in place to control the risk of physical, chemical, biological or allergen contamination of product.
GMP M 9	Segregation and cross-contamination	The standard shall require that procedures are in place to prevent contamination and cross-contamination of products including the possibility of contamination from recycled materials and mixing of raw materials, if the effect of the material gives rise to food safety issues.
GMP M 10.1	Housekeeping, cleaning and hygiene	The standard shall require that appropriate standards of housekeeping, cleaning and hygiene are maintained at all times and throughout all the stages with validation and recording of the effectiveness of the cleaning.
GMP M 10.2	Housekeeping, cleaning and hygiene	The standard shall require that cleaning materials shall be suitable for intended use and stored appropriately.
GMP M 11.1	Air and water quality management	The standard shall require that the quality of air, compressed air and water (including steam) that comes into contact with packaging material shall present no risk to product safety.
GMP M 11.2	Air and water quality management	The standard shall require that clean water, suitable for the process, shall be used.
GMP M 11.3	Air and water quality management	The standard shall require that, where applicable, storage of water shall occur so as to prevent contamination.
GMP M 12	Waste management	The standard shall require that adequate systems are in place for the collation, collection and disposal of waste material.
GMP M 13	Pest control	The standard shall require that a system is in place for controlling or eliminating the risk of pest infestation on the site or in the facilities.
GMP M 14.1	Transport	The standard shall require that all vehicles, including contracted out vehicles, used for the transportation of raw materials or packaging materials, intermediate / semi processed product and finished product shall be suitable for the purpose, maintained in good repair and be clean.

GMP M 14.2	Transport	The standard shall require that there shall be no potential for contamination from other materials carried on the same vehicle.
GMP M 14.3	Transport	The standard shall require that hazards and risks shall be considered.
GMP M 15.1	Personal hygiene, protective clothing / workwear and medical screening	The standard shall require that documented personal hygiene standards based on risk of product contamination shall be in place.
GMP M 15.2	Personal hygiene, protective clothing / workwear and medical screening	The standard shall require that hand washing and toilet facilities shall be provided.
GMP M 15.3	Personal hygiene, protective clothing / workwear and medical screening	The standard shall require that suitable and appropriate protective clothing shall be provided.
GMP M 15.4	Personal hygiene, protective clothing / workwear and medical screening	The standard shall require that a medical screening procedure shall be in place to identify conditions impacting food safety subject to legal restrictions in the country of operation.
GMP M 15.5	Personal hygiene, protective clothing / workwear and medical screening	The standard shall require that in all cases the requirements described under GMP M 15.1, 15.2, 15.3, and 15.4 shall also apply to contractors and visitors who may have an impact on packaging contamination.
GMP M 16	Training	The standard shall require that an effective system is in place to ensure that all employees are adequately trained and instructed and the effectiveness of the training is monitored in packaging hygiene, quality and food safety principles and practices, commensurate with their activity.
GMP M 17.1	Packaging and storage of product	The standard shall require that packaging material shall be packaged, handled and segregated in a manner that minimises sources of physical, chemical, biological and allergen contamination.
GMP M 17.2	Packaging and storage of product	The standard shall require that products shall be held or stored in designated areas and handled under the proper conditions to minimise contamination.

GMP M 18	Trademarked material	The standard shall require that a system is in place to control the disposal of trademarked material.
GMP M 19.1	Product recall / withdrawal	The standard shall require that a system is in place to manage product recall and withdrawal.
GMP M 19.2	Product recall / withdrawal	The standard shall require that the system described under GMP M 19.1 shall be recorded and tested at an appropriate frequency.
GMP M 20	Inventory management	The standard shall require that a system is in place to ensure materials and ingredients are used in the correct order and within the allocated shelf life.
GMP M 21	Allergens	The standard shall require that the use of any known allergens used in packaging manufacture are identified, recorded and labelled accordingly.
GMP M 22	Material claims	The standard shall require that where recycled material, plant based material or functional additives are used there shall be sufficient data to ensure safe food contact and documentation of claims.
GMP M 23.1	Printed materials management	The standard shall require that where packaging materials are printed with product ingredient list(s), allergens, identification code and other critical information, they shall be managed in a manner that prevents misprinting.
GMP M 23.2	Printed materials management	The standard shall require that the organisation has controls in place to ensure printed materials are not mixed or intermingled including in-process and reworked materials.