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.

SECTION 1: HACCP or Hazard Based Requirements

Clause Number	Clause Name	Scheme Application Requirement	Compliant?	Scheme Information - Narrative text	Supporting Documentation Reference	FOR GFSI only	FOR GFSI only
Table I: HACCP Requirements						**Compliant**	**Feedback GFSI**
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 pre-requisite programmes. This maybe a HACCP based system or another Hazard and Risk Management system that covers the Codex Alimentarius HACCP principles.	Yes	Hazard and risk analysis, based on 7 principles of HACCP. 2.1 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 thesystem is fully implemented and evaluated for its effectiveness. 2.2 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.	2.1 and 2.2	Yes	
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 components parts or the whole material could compromise food safety.	Yes	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 intendedscope of certification.	2.2.1	Yes	

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SECTION 2: FOOD SAFETY MANAGEMENT REQUIREMENTS

Clause Number	Clause Name	Scheme Application Requirement	Compliant?	Scheme Information - Narrative text	Supporting Documentation Reference	FOR GFSI only	FOR GFSI only
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.	Yes	The site's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging Materials. 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. 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.	1.1 and 1.1.4 3.1	Yes	
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.	Yes	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.	5.1.1	Yes	
FSM M 1.3	Food Safety Management for Packaging Materials General Requirements	The management system shall validate packaging design and development to ensure food safe and legal manufacture.	Yes	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. The company shall ensure that production is carried out using defined operating conditions which result in safe and legal products to defined quality parameters.	5.1.2 5.1.3	Yes	
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.	Yes	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 specifi ed quality, and confi rms its responsibility to its customers.	1.1.1	Yes	
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.	Yes	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.	3,1	Yes	
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 staff whose activities affect food safety.	Yes	The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality, regulatory compliance and quality.	1,3	Yes	
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.	Yes	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. 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. 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.	1.1.1 1.1.3 1.1.4	Yes	
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.	Yes	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. . 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.	2.2.12 1.2.1	Yes	
FSM M 6.2	Management review	The standard shall require that the HACCP Plan and food safety programs (or PRPs) 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.	Yes	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.	2.2.12	Yes	
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 and improve the food safety system for packaging materials.	Yes	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.	1.1.4	Yes	
FSM M 8.1	General documentation requirements	The standard shall require that documented procedures are in place to demonstrate compliance with the standard	Yes	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.	3,1	Yes	

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	Yes	An effective document control system shall ensure that only the correct versions of documents, including recording forms, are available and in use.	3,2	Yes	
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.	Yes	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. 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..	3.3.3 3.3.4	Yes	
FSM M 9.1	Specified requirements	The standard shall require that the organisation ensures that documented specifications are	Yes	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	3,4	Yes	
FSM M 9.2	Specified requirements	The standard shall require that a specification review process is in place.	Yes	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.	3.4.5	Yes	
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.	Yes	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.	3,1	Yes	
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.	Yes	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.	3.5.1	Yes	
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.	Yes	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 •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. 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. 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. 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.	1.2.2 3.5.4 3.12.1 3.13.5	Yes	
FSM M 13	Control of Non conformity	The standard shall require that the organisation ensures that any packaging materials, which do not conform to food safety requirements, are clearly identified separated and controlled to prevent unintended use or delivery.	Yes	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 .	5.7.1	Yes	
`	Product release	The standard shall require that the organisation prepares and implements appropriate product release procedures.	Yes	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. 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.r.	2.2.11 3.9.4	Yes	
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 specifier and regulatory requirements including food fraud mitigation plan requirements.	Yes	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. 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. 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.	3.6.1 3.8 3.10.1	Yes	
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.	Yes	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	3,7	Yes	
FSM M 15.3	Purchasing	The standard shall require that control of such outsourced processes shall be identified and documented within the food safety system.	Yes	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.	3.7.4	Yes	
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.	Yes	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.	3.7.7	Yes	
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 manufactured, stored, transported and potential use. The results of evaluations, investigations and follow-up actions shall be recorded.	Yes	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.	3.7.1	Yes	

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.	Yes	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. 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.	3.12.1 3.12.2	Yes	
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.	Yes	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.	3,13	Yes	
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.	Yes	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 • an identification code and calibration due date • prevention from adjustment by unauthorised staff • protection from damage, deterioration and misuse.	5.5.1	Yes	
FSM M 19.2	Control of measuring and monitoring devices	The standard shall require that the organisation identifies the measuring and monitoring devices required	Yes	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 • an identification code and calibration due date • prevention from adjustment by unauthorised staff • protection from damage, deterioration and misuse.	5.5.1	Yes	
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.	Yes	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	Yes	
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.	Yes	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 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. The entirety of clauses 2.2 and 4.4 (statements of intent listed here) present the practical measures to be taken by the site to evaluate the hazards to food safety (known as 'product safety' in Issue 5 of the Packaging Standard).	2.2 4.4	Yes	
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.	Yes	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. 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 th site Position Statement P552 outlines 'food defence' in the context of packaging, outlining the common ways that food defence will present itself. The entirety of clauses 2.2 and 4.4 (statements of intent listed here) present the practical measures to be taken by the site to evaluate the hazards to food safety (known as 'product safety' in Issue 5 of the Packaging Standard).	2.2 4.4	Yes	
FSM M 20.3	Food defence plan	The standard shall require that the organization's Food defence plan and shall be supported by the organisation's Food Safety Management System.	Yes	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. 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. Security arrangements shall be assessed to ensure the integrity of products and processes. Position Statement P552 outlines 'food defence' in the context of packaging, outlining the common ways that food defence will present itself. The entirety of clauses 2.2 and 4.4 (statements of intent listed here) present the practical measures to be taken by the site to evaluate the hazards to food safety (known as 'product safety' in Issue 6 of the Packaging Standard), and 3.1 outlines the system.	2.2 3.1 4.4 Position Statement P552	Yes	
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.	Yes	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. 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. 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. 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. 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	3.8.1 3.8.2 4.4 4.4.1	Yes	

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.	Yes	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 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. 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). 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). 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 thesite. . The entirety of clauses 2.2 and 4.4 (statements of intent listed here) present the practical measures to be taken by the site to evaluate the hazards to food safety (known as 'product safety' in Issue 6 of the Packaging Materials Standard).	3.8.2 3.8.3 3.10.1 4.4	Yes	
FSM M 22.2	Food fraud mitigation plan	The standard shall require that the organization's fraud mitigation plan and shall be supported by the organisation's Food Safety Management System.	Yes	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. 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. 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 th site. The entirety of clauses 2.2 and 4.4 (statements of intent listed here) present the practical measures to be taken by the site to evaluate the hazards to food safety (known as 'product safety' in Issue 6 of the Packaging Materials Standard), and 3.1 outlines the system.	2.2 3.1 4.4	Yes	
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.	Yes	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.	3.11.1	Yes	
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 out-sourced product, inputs or service related to food safety.	Yes	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.	3.11.5	Yes	
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.	Yes	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.	3.11.3	Yes	
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.	Yes	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.	3.11.1	Yes	
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.	Yes	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. A full description of the product, product group and process shall be developed, which includes all relevantinformation on product safety and integrity. As a guide this shall include:•• composition (e.g. rawmaterials, 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 hygienesensitive products, or the physical or chemical conditions. 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 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 (whererelevant). The site shall review the statement of complianceat a risk-based frequency. 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.	2.2.6 2.2.3 3.4.3 5.1.1	Yes	
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.	Yes	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.	3.11.1	Yes	

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).	Yes	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.	3.11.1	Yes	
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.	Yes	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.	5.6.8	Yes	
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.	Yes	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	Yes	
FSM M 25	Environmental monitoring	The standard shall require that a risk-based environmental monitoring programme be in place.	Yes	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.	4.8.5	Yes	
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.	Yes	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..	1.1.6	Yes	

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

SECTION 3: GOOD INDUSTRY SECTOR PRACTICE REQUIREMENTS

Clause Number	Clause Name	Scheme Application Requirement	Compliant?	Scheme Information - Narrative text	Supporting Documentation Reference	FOR GFSI only	FOR GFSI only
Table I: Good Agricultural Practice Requirements						**Compliant**	**Feedback GFSI**
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.	Yes	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	Yes	
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.	Yes	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.	4,2	Yes	
GMP M 2	Local environment	The standard shall require that all grounds within the site or facility shall be maintained to an appropriate standard.	Yes	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	Yes	
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.	Yes	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 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.	4.1 4,2	Yes	
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.	Yes	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.	4,2	Yes	
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.	Yes	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.	4,6	Yes	
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.	Yes	An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns.	4,7	Yes	
GMP M 7.1	Staff facilities	The standard shall require that staff facilities, such as toilets, lunch facilities, changing/locker rooms are designed and operated to minimise food safety risks.	Yes	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.	6,3	Yes	
GMP M 7.2	Staff facilities	The standard shall require staff and visitor access definitions and include visitor and contractor control.	Yes	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	Yes	
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.	Yes	All practicable steps shall be taken to identify, eliminate, avoid or minimise the risk of foreign body or chemical contamination. Hazard and risk analysis shall be used to identify, control and manage any potential risks from microbiological contamination and any potential allergens.	4.9 4.9.3.2	Yes	
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.	Yes	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. 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.	2.2.5 5.9	Yes	
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.	Yes	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. 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.	4.8 4.8.2	yes	

GMP M 10.2	Housekeeping, cleaning and hygiene	The standard shall require that cleaning materials shall be suitable for intended use and stored appropriately.	Yes	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. Materials and equipment used for cleaning toilets shall be differentiated from those used elsewhere, and physically segregated where necessary.	4.8.3 4.8.4	yes	
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.	Yes	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	Yes	
GMP M 11.2	Air and Water Quality Management	The standard shall require that clean water, suitable for the process, shall be used.	Yes	All water used in the processingof the products or equipmentcleaning shall be potable or suitably treated to prevent contamination.	4.3.1	Yes	
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.	Yes	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	Yes	
GMP M 12	Waste management	The standard shall require that adequate systems are in place for the collation, collection and disposal of waste material.	Yes	Waste disposal shall be managed in accordance with legal requirements and to prevent accumulation, risk of contamination and the attraction of pests.	4.10.	Yes	
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.	Yes	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.	4,11	Yes	
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.	Yes	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. All delivery vehicles and shipping containers shall be subject to a documented hygiene and odour checking procedure before loading	5.10.4 5.10.5	Yes	
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.	Yes	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.	5.10.1	Yes	
GMP M 14.3	Transport	The standard shall require that hazards and risks shall be considered.	Yes	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 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.	5.10. 2.2.6	Yes	
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.	Yes	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.. 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).	6.5.1 6.5.2	Yes	
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.	Yes	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	Yes	
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.	Yes	Appropriate protective clothing shall be worn in production and storage areas to minimise the risk of product contamination.	6,5	Yes	
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.	Yes	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.	6,4	Yes	
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.	Yes	Facilities for visitors and contractors shall enable compliance with the site's hygiene policy.	6.3.7	Yes	

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.	Yes	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. 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.	6.1.1 6.1.2	Yes	
GMP M 17.1	Packaging and Storage of Product	The standard shall require that packaging material shall be packaged, handled, segregated in a manner that minimizes sources of physical, chemical, biological and allergen contamination.	Yes	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	Yes	
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 minimize contamination.	Yes	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. In order to prevent contamination, documented procedures shall be in place to appropriately segregate raw materials, intermediate products and finished products	5.9.3 5.9.6	Yes	
GMP M 18	Trademarked material	The standard shall require that a system is in place to control the disposal of trademarked material.	Yes	Substandard trademarked materials shall be rendered unusable through a destructive process. All materials disposed of shall be recorded. Any unused printed product shall be accounted for and either disposed of or identified and appropriately stored.	4.10.4 5.3.7	Yes	
GMP M 19.1	Product Recall/withdrawal	The standard shall require that a system is in place to manage product recall and withdrawal.	Yes	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.	3,13	Yes	
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.	Yes	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	Yes	
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.	Yes	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	Yes	
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.	Yes	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	Yes	
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.	Yes	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 •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.	3.4.3	Yes	
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.	Yes	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. 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. Each print run shall be approved against the agreed standard (or master sample). This shall be recorded.	5.2.1 5.3.1	Yes	
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 re-worked materials.	Yes	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.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.	5.3.1 5.3.5	Yes	