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APPLICATION INFORMATION

Benchmark assessment team and date

Certification programme information	
Certification programme Name(s)	BRC Global Standards: - Packaging Materials issue 6
Certification programme owner name and address	BRC Trading Ltd 7 Harp Lane, London, EC3R 6DP
Certification programme owner name, email, contact number	Karen Betts Karen.betts@brcglobalstandards.com +44 (0) 7814389309
Date of previous application if application	–
Benchmark Leader name and contact details	Moreno Giordani mgiordani@blu.it
GFSI Technical Manager name	Marie-Claude Quentin
Observers name	N/A
Interpreter's name (if applicable)	N/A
Date of this office assessment	10 th and 11 th December 2019
Language (e.g. English or other)	English

Benchmark assessment scopes

GFSI Scopes of Recognition		Scopes of Recognition Applied For	Final Valid Scopes of Recognition
AI	Farming of Animals		
AII	Farming of Fish		
BI	Farming of Plants		
BII	Farming of Grains and Pulses		
C	Animal Conversion		
D	Pre-process Handling of Plant Products		
E I	Processing of Perishable Animal Products		
E II	Processing of Perishable Plant Products		

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E III	Processing of Perishable Animal and Plant Products (Mixed Products)		
E IV	Processing of Ambient Stable Products		
F	Production of Feed		
J	Provision of storage and distribution services		
L	Production of (Bio) Chemicals		
M	Production of Food Packaging	X	X
N	Food Broker/Agent		

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EXECUTIVE SUMMARY AND RECOMMENDATIONS TO THE BOARD

Summary of assessment

Results of the self-assessment and office visit.

The purpose of the GFSI assessment was to evaluate that the BRC Global Standard for Packaging Materials issue 6, certification programme of BRC Trading Ltd, issued in August 2019, is in compliance with the defined requirements as set out in the 7.2 version of the GFSI Benchmarking Requirements.

The assessment was made up of a preliminary Desk Review, completed remotely by the BL (Benchmark Leader) under supervision of the GFSI STM (Senior Technical Manager) in September and October 2019, and was based on the review of the evidence provided by the certification programme owner in the self-assessment excel file for GFSI part III to cover the scope of recognition applied (see annex 1).

All findings raised, concerning the request of additional information and disagreement with the ranking of CPO, have been communicated in writing and discussed with the CPO during the documental assessment.

No critical findings or other impeding factors were raised at this step and the office assessment was scheduled by a specific agenda (Office Assessment Plan).

The office assessment was carried out on 10th and 11th December 2019 by the GFSI BL and TM and achieved the main purpose of the visit which was to check the maintenance of the certification programme owner's Integrity Programme through a sample record review.

The findings emerged during the overall assessment have been discussed and summed up in a report (Annual Integrity Programme- List of findings) signed by the Certification Programme Owner, the Benchmark Leader and the GFSI technical manager.

No non-conformity against the new issue of the BRC GS Packaging Material certification programme were found.

Results of the stakeholder consultation.

Placeholder

1) Placeholder

2) Placeholder

Recommendations to the GFSI board

Placeholder

1) Placeholder

2) Placeholder

RESULTS OF ASSESSMENT AND OFFICE VISIT

Executive summary

Overview.

BRC Trading Ltd is a CPO (Certification Programme Owner) providing a range of standards for brand and consumer protection.

The BRC GS standards are used by over 28,672 certified organisations at November 2019, of which 4655 for GS Packaging Material issue 5, across 130 countries, with certifications issued through a global network of accredited certification bodies.

BRC GS is currently working with 74 Certification Bodies accredited by 14 different Accreditation Bodies, all International Accreditation Forum (IAF) members and signatories to the Multilateral Recognition Arrangement (MLA). Five (5) new certification body are under provisional recognition for the GFSI certification programme.

BRC Trading (BRCT) was formed in 2003 to provide services to support the British Retail Consortium. In 2016, BRC ownership transferred from a sole subsidiary of the British Retail Consortium, and ownership is now comprised of British Retail Consortium, BRCT Board, and LGC, with the latter as the majority shareholder. In 2019 a rebranding has been carried out and the BRC acronym changing to Brand Reputation through Compliance.

The aim of BRC Global standards is to guarantee the standardisation of quality, safety and operational criteria and to ensure that manufacturers fulfil their legal obligations and provide protection for the end consumer.

BRC Global Standards are often a requirement of leading retailers who use them as part of their brand protection processes.

The BRC Global Standard for Packaging Materials was originally developed in 2001, it was designed to protect the consumer by providing a common basis for the certification of companies supplying packaging to food producers. The Standard provides a framework for all types of packaging manufacturers to assist them in the production of safe packaging materials and to manage product quality to meet customers' requirements.

The standard has been updated at regular intervals and now is in issue 6, published on 1st August 2019 and certifiable from the 1st February 2020 (6 months transition). Certificates issued against Issue 5 will remain valid for the duration indicated on the certificate.

The certification programme is designed to operate under product/process certification according to ISO 17065 accreditation.

The evaluation activity is based on the audit of the effective practices/processes of the organisation by review of the procedural documentation, records and site inspections at the time of the audit.

The audit may be announced or unannounced according to the organization choice.

The main changes for issue 6 have been focused on:

- introducing product safety and quality culture requirements;
- consolidating the requirements for corrective and preventive action into a new «fundamental» clause;
- ensuring global and continued alignment with GFSI benchmarking requirements, including microbial environmental monitoring programme;
- improving the requirements about site security, food defence and food fraud system, also according to the GFSI benchmarking requirements;
- enhancing transparency and the process control of product quality, particularly printed packaging product;
- simplifying the hygiene requirements based solely on risk (the two previous hygiene categories “High Hygiene/Basic Hygiene” are removed);

General compliance, strengths and weaknesses.

The GFSI assessment consists of the benchmarking for the recognition of the BRC Global Standards Packaging Material issue 6 against GFSI BENCHMARKING REQUIREMENTS - Version 7.2.

The previous version of the BRC-GS Packaging (issue 5), was previously recognised against version 7.1 of the GFSI requirements for the category M in March 2018 and against the version 7.2 in early 2019.

The new issue 6 has been evaluated again against the version 7.2 for the category M in late 2019.

The assessment activities included a documental review of the CPO self-assessment forms and an office visit.

The documental review was carried out by the Benchmark Leader during the month of September and October 2019. All the documental concerns have been clarified before the office visit on 10th and 11th December 2019.

During the office visit, the Benchmark Leader interviewed the BRC Trading directors and certification programme managers. The Benchmark Leader also reviewed documents, performance data and other management data.

Specifically, the Benchmark Leader examined the Integrity Programme and management processes in relation to the main requirements described in GFSI Benchmarking Requirements Part II.

To ensure stakeholder consultation, BRC Global Standards has implemented some specific committee (Working Groups/TAC), EU and American IAB (International Advisory Board).

The working groups include representation of packaging manufacturing industries, retailers, certification bodies and independent technical expert (see appendix 7 of the standard).

Related minutes of the meeting have been consulted.

The revision process of the standard is carried out typically each 3 years.

The last steps for the new BRC GS Packaging Material standard approval were:

- UK and US Working groups meeting (June-October 2018)
- Public consultation (from 20 November to 15 December 2018);
- Review and discussion of the comments (January 2019);
- Approval meeting (21/02/2019, final draft);
- Standard publication (01/08/2019);
- Auditor training conversion course (from September 2019);
- Certification against the issue 6 standard will start from 01/02/2020.

The Standard and relative documents ("Issue 6 Interpretation Guides", "Guide to Key Changes", etc) are available on the web site as free download.

Auditors are registered in a Database. Records were provided for the auditors to demonstrate the required qualifications.

During 2019 the CPO has implemented an on-line Post-Farm GFSI Knowledge examination proctored by ATP (Approved Training Provider) or internal personnel. A verification of the exam records has been carried out during the assessment. 272 auditors successfully completed the exam.

The Integrity programme (BRC Compliance Programme) reviews each 6 months the performance of the Certification Body through 5 key performance indicators (KPI), as described in the document "BRC 009 Requirements and KPI Measurements".

The 5 key performance indicators (KPI) are:

1. Audit report quality
2. Audit protocol
3. Auditor and personnel management
4. Timely audit submissions to the BRC Global Standards Directory
5. Effective communication with the BRC Global Standards

As part of this programme the BRC Compliance Team audits the offices of certification bodies, accompanies auditors on the audit to observe the performance (witness audit) and also undertakes independent visits to certified sites to ensure that products/processes are being maintained in line with the certification status and that

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the audit and reporting process is to the expected standard. The frequency of this activities is based on the non-compliance risk

During the office assessment the Integrity programme process was evaluated. In particular, the suspension of a certification body (rated 2 stars on July 2019), the KPI and office visit of a certification body (rated 5 stars on July 2019), and the approval process of a new certification body were reviewed.

The main points of strength highlighted in the previous office assessments are confirmed:

- adequate resources and a well-structured organisation;
- long experience in the management of food certification programmes;
- years of experience which enhance and provide greater depth to the integrity programme.
- transparent communication with certification bodies, stakeholders and interested parties;
- auditor enhanced programme (training, webinar and exams).
- advanced data management information (BRC Directory) available to the interested parties;

No particular points of weakness were recognised on the management of the Certification Programme.

Changes made to the certification programme following the benchmarking assessment.

No non-conformity against the new issue of the BRC GS Packaging Material certification programme were found and no changes were required.

Some deficiencies raised during the GFSI Integrity Programme were highlighted such as findings, and these were promptly addressed by the CPO.

Time and location details

	Location	People present GFSI, consultant, CPO. Names and roles	Date and time
Self-assessment desktop review	Remote assessment	Moreno Giordani, Benchmark Leader	September 2019, 1,0 days
Office visit	BRCT Office, London (UK)	Moreno Giordani, Benchmark Leader Marie Claude Quentin, GFSI Technical Manager David Brackston, BRC Technical Director Karen Betts, Head of Compliance John Figgins, Technical Food Specialist Richa Bedi-Navik, Technical Manager Storage & Distribution Seema Patel, Compliance Technical Manager Ritu Bajaj, Compliance Audit Manager (remote) Michelle Tindale, Head of Academy Operations	10 th and 11 th December 2019, 1 day



List of issues raised

GFSI Benchmarking requirement part	Clause	Nonconformity	Partly / no	Action from CPO	Recommendation from Benchmark leader	Decision from GFSI technical manager

Signed for the Certification Programme Owner

Signed – Benchmark Leader

signed for GFSI

Name and position

David Brackston, Technical Director

Name and position

Moreno Giordani, Benchmark Leader

Name and position

Marie-Claude Quentin, Technical Manager

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RESULTS OF PUBLIC STAKEHOLDER CONSULTATION

Executive summary

Overview.

Placeholder

1) Placeholder

2) Placeholder



List of issues raised

			Answer from CPO	Recommendation from Benchmark leader	Decision from GFSI technical manager



ANNEX I – Final assessment spreadsheet

v7.2 Part III _ M _ Production Of Food Packaging-BRCGS.19.12.MG

ANNEX II – Office Visit Check List
10-11/12/2019 BRC Trading office assessment
(not for public consultation)