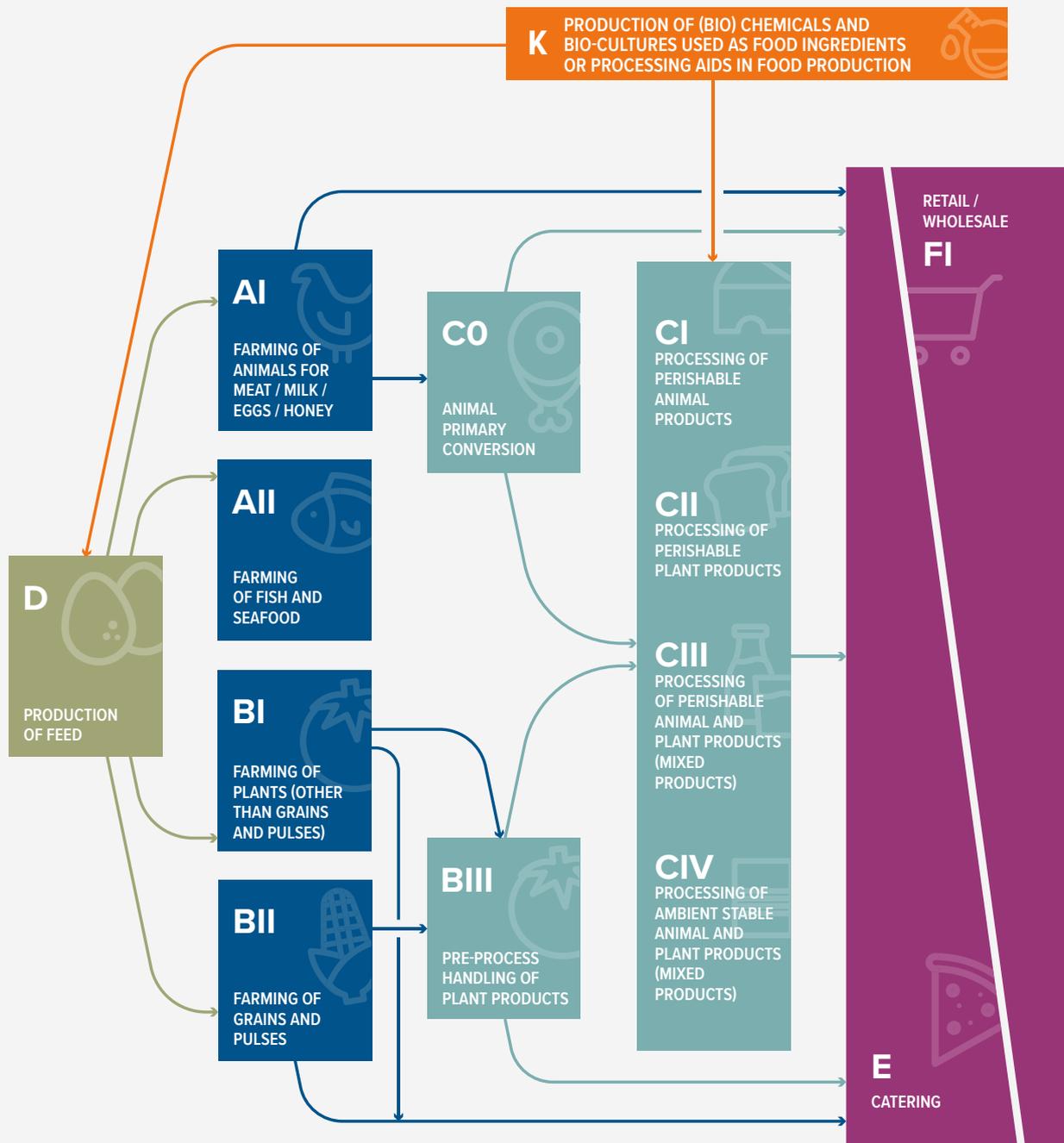




**GFSI** BENCHMARKING REQUIREMENTS VERSION 2024

**PART III**  
**REQUIREMENTS  
FOR THE CONTENT  
OF PROGRAMMES**

**/ Production of  
Food Packaging**



- FII** FOOD BROKER / AGENT
- G** PROVISION OF STORAGE AND DISTRIBUTION SERVICES
- H** PROVISION OF FOOD SAFETY SERVICES
- I** PRODUCTION OF FOOD PACKAGING
- Ji** HYGIENIC DESIGN OF FOOD BUILDINGS AND PROCESSING EQUIPMENT (FOR BUILDING CONSTRUCTORS AND EQUIPMENT MANUFACTURERS)
- Jii** HYGIENIC DESIGN OF FOOD BUILDINGS AND PROCESSING EQUIPMENT (FOR BUILDING AND EQUIPMENT USERS)

# Part III - / Production of Food Packaging

Part III of the GFSI Benchmarking Requirements defines the key elements required in a Certification Programme in relation to:

- **Hazard and Risk Management Systems** (Hazard Analysis and Critical Control Points (HACCP) or HACCP-based systems);
- **Food Safety Management Systems;**
- **Good Industry Practices, Good Manufacturing Practices, Good Agricultural Practices.**

This document applies to Certification Programmes applying for the scope of recognition I - Production of Food Packaging. This scope includes the following product, services and activities:

- **Production of food and feed 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.**

The requirements – named key elements – were identified by a multi-stakeholder group including industry experts to ensure relevance to this scope while ensuring harmonisation of food safety programmes across industry. Although the structure of each scope of Part III of the Benchmarking Requirements is aligned, some of the key elements may be specific to the industry included in this scope.

GFSI-recognised Certification Programme Owners are required to address each key element outlined in this document. The detailed content of each

individual Certification Programme must however be independently developed and is not expected to be a direct copy of the GFSI Benchmarking Requirements.

GFSI has defined in a Glossary terms used in key elements. Part IV, the Glossary, is an integrated part of the GFSI Benchmarking Requirements and definitions shall be applied accordingly in Certification Programmes. In the GFSI Benchmarking Requirements, food is used as an umbrella term and refers to the object of each of the scope, i.e. food, feed, packaging as applicable.

Certification Programmes requiring Certification Bodies to operate according to ISO / IEC 17021 shall ensure they meet the ISO 22000 requirements as well as the Benchmarking Requirements for applicable sectors outlined in Part III. If this is not possible, then the ISO 22000 requirements shall prevail.

Certification Programmes requiring Certification Bodies to operate according to ISO / IEC 17065 shall ensure they meet the Benchmarking Requirements for applicable sectors outlined in Part III.

The Codex Alimentarius Guidelines on food hygiene and its HACCP annex constitutes an internationally-recognised reference for food business operators and competent authorities to oversee food safety. As such, in addition to the following key elements, the Certification Programme Owner shall ensure that the site has knowledge and align their practices to best industry practices and the Codex Alimentarius General Principles of Food Hygiene.

## SECTION 1: HAZARD AND RISK MANAGEMENT SYSTEMS REQUIREMENTS

| REFERENCE   | ELEMENT                           | THE PROGRAMME SHALL REQUIRE THAT  |
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| HACCP 1.1   | Hazard and Risk Management System | A systematic, Hazard and Risk Management System (or HACCP system) based on the current version of Codex Alimentarius General Principles of Food Hygiene shall be implemented to identify specific hazards, the measures for their control shall be based on scientific evidence of risk to health. This system shall take all relevant laws into consideration. |
| HACCP 1.2   | Hazard and Risk Management System | The scope of the Hazard and Risk Management System (or HACCP system) and applicable prerequisite programmes shall be clearly defined in accordance with the product(s)/activities undertaken at the site and included within the sites scope of certification.  |
| HACCP 1.3   | Hazard and Risk Management System | The prerequisite programmes shall be designed, established and verified where possible, to support the application and implementation of the Hazard and Risk Management System (or HACCP system).   |
| HACCP 1.4   | Hazard and Risk Management System | There shall be commitment from senior management for implementation of an effective Hazard and Risk Management System (or HACCP system).  |
| HACCP 1.4.1 | Hazard and Risk Management System | Appropriate knowledge and expertise for the development of an effective Hazard and Risk Management System (or HACCP system) shall be used.  |
| HACCP 1.4.2 | Hazard and Risk Management System | The Hazard and Risk Management System (or HACCP system) shall be reviewed regularly and updated when there is a significant change that could introduce new hazards and/or control measures.  |

## SECTION 2: FOOD SAFETY MANAGEMENT REQUIREMENTS

| REFERENCE | ELEMENT                                       | THE PROGRAMME SHALL REQUIRE THAT  |
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| FSM 1     | Management Responsibility                     | A clear organisational structure identifying the job functions and responsibilities of at least those employees whose activities affect food safety shall be established, implemented and maintained.   |
| FSM 2     | Management Commitment and Food Safety Culture | A commitment from senior management to establish direction, engage personnel, and provide sufficient resources to maintain a positive food safety culture and continuously improve Food Safety Management System shall be provided.   |
| FSM 2.1   | Food Safety Culture                           | A demonstrable commitment from all personnel to the production and safe handling of food shall be available.  |
| FSM 2.2   | Food Safety Culture                           | A food safety culture assessment plan shall be established, implemented and maintained to identify areas of improvement to drive a positive behaviours. This shall include elements consisting of at a minimum: communication, training, feedback from employees and performance measurement on food safety related activities. |
| FSM 3     | Management Review                             | The senior management shall review all elements of the Food Safety Management System, including Food safety culture, the Hazard and Risk Management System HACCP plan or HACCP- based plans regularly, and in case of any change that impacts food safety, to ensure their continuing suitability and effectiveness.            |
| FSM 4.1   | Food Safety Legislation                       | Procedures shall be established, implemented and maintained to ensure compliance with applicable legislation (both countries of production and intended sale).  |
| FSM 5     | Food Safety Management System                 | The elements of the Food Safety Management System shall be established, implemented, maintained and continuously improved and shall have a scope appropriate to the range of business activities to be covered.   |

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| <b>FSM 6</b>   | Food Safety Policy and Objectives | A clear, concise and documented food safety policy statement shall be in place, as well as measurable objectives specifying the extent of the organisation's commitment to meet the food safety needs.                                |
| <b>FSM 7.1</b> | Food Defence                      | A food defence threat assessment procedure shall be established, implemented and maintained to identify potential threats and prioritise food defence measures.   |
| <b>FSM 7.2</b> | Food Defence                      | A documented food defence plan shall be in place specifying the measures implemented to mitigate the public health risks from any identified food defence threats.  |
| <b>FSM 7.3</b> | Food Defence                      | This food defence plan shall be developed, implemented, verified, maintained and reviewed on regular basis or when a new threat is established.   |
| <b>FSM 7.4</b> | Food Defence                      | Appropriate knowledge and expertise for the development and maintenance of an effective food defence threat assessment plan shall be used.  |
| <b>FSM 8.1</b> | Food Fraud                        | A food fraud vulnerability assessment procedure shall be established, implemented and maintained to identify potential vulnerability and prioritise food fraud mitigation measures.   |
| <b>FSM 8.2</b> | Food Fraud                        | A documented food fraud management plan shall be in place specifying the measures implemented to mitigate the public health risks from the identified food fraud vulnerabilities.   |
| <b>FSM 8.3</b> | Food Fraud                        | This food fraud management plan shall be developed, implemented, verified, maintained and reviewed on regular basis or when a new vulnerability is established.   |
| <b>FSM 8.5</b> | Food Fraud                        | Appropriate knowledge and expertise for the development and maintenance of an effective food fraud assessment plan shall be used.   |
| <b>FSM 9.1</b> | Documentation Requirements        | A procedure shall be established, implemented and maintained for the management and control of documented information required to demonstrate the effective operation and control of processes and the Food Safety Management System. |

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| <b>FSM 9.2.1</b>  | Documentation Requirements             | All the above-mentioned documented information shall be securely stored for the time period required to meet customer and legal requirements, or for a period exceeding the shelf-life of the food if customer or legal requirements are not available. It shall be effectively controlled and readily accessible when needed.                                     |
| <b>FSM 10.1</b>   | Specified Requirements/ Specifications | Specified requirements or specifications shall be established, implemented and maintained for all inputs to the process, including services that are purchased or provided and have an effect on food safety. Microbiological, physical, chemical and allergenic specifications used for food safety purposes shall be based on appropriate scientific principles. |
| <b>FSM 10.2</b>   | Specified Requirements/ Specifications | A review process of the specified requirements or specifications shall be in place.  |
| <b>FSM 10.3</b>   | Specified Requirements/ Specifications | The Food Safety Management System shall ensure that packaging used to impart or provide a functional effect on the safety of the food to be packed in this packaging, such as shelf life extension shall, where known, be effective within its own specified criteria.   |
| <b>FSM 10.4</b>   | Specified Requirements/ Specifications | There shall be sufficient data to ensure food contact with the packaging is safe, and sufficient documentation of claims, according to the intended use, where recycled material, plant based material or functional additives are used.   |
| <b>FSM 11</b>     | Procedures                             | Effective procedures and instructions shall be established, implemented and maintained for all processes and operations having an effect on food safety.   |
| <b>FSM 12</b>     | Resource Management                    | The resources needed to establish, implement, maintain, review and improve the Food Safety Management System shall be identified and assigned.   |
| <b>FSM 13.1.2</b> | Purchasing and Supplier Performance    | A purchasing procedure shall be established, implemented and maintained to ensure that all inputs to the process, including externally purchased materials and services which have an effect on food safety, conform to specified requirements or specifications as well as food safety and regulatory requirements.   |

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| <b>FSM 13.2.1</b> | Purchasing and Supplier Performance | A procedure for the evaluation, approval and continued monitoring of suppliers which have an effect on food safety shall be established, implemented and maintained. The procedure shall address procurement in emergency situations to ensure that food still conforms to the documented specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded. |
| <b>FSM 13.2.3</b> | Purchasing and Supplier Performance | A procedure for the evaluation, approval and continued monitoring of suppliers which have an effect on food safety shall be established, implemented and maintained. The procedure shall address procurement in emergency situations to ensure that packaging still conforms to the specified requirements or specifications, and the supplier has been evaluated. The results of evaluations, investigations and follow up actions shall be recorded.       |
| <b>FSM 13.3</b>   | Purchasing and Supplier Performance | Outsourced processes that may have an effect on food safety shall be identified and controlled. Such controls shall be documented in the Food Safety Management System.  |
| <b>FSM 14.1.1</b> | Traceability                        | Procedures shall be established, implemented and maintained to ensure product identification from the supplier (minimum one step back) through any processes undertaken to the recipient of the food (minimum one step forward).   |
| <b>FSM 14.1.3</b> | Traceability                        | Procedures shall be established, implemented and maintained to ensure product identification from the supplier (minimum one step back) through any processes undertaken to the recipient of the packaging (minimum one step forward).  |
| <b>FSM 14.2</b>   | Traceability                        | Documented tests of the traceability system shall be undertaken to ensure this is operating effectively.   |
| <b>FSM 15</b>     | Product Development                 | Product design and development procedure shall be established, implemented and maintained for new products and changes to product or manufacturing processes to ensure safe and legal products are produced.   |

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| <b>FSM 16.2</b> | Allergen Management                                   | An allergen management plan shall be established, implemented and maintained. This shall include a risk assessment of allergen cross-contact, implemented controls to reduce or eliminate that risk.  |
| <b>FSM 17.1</b> | Control of Measuring and Monitoring Equipment/Devices | The equipment/devices used to measure parameters critical to ensure food safety shall be identified.  |
| <b>FSM 17.2</b> | Control of Measuring and Monitoring Equipment/Devices | The identified equipment/devices shall be regularly calibrated; calibration shall be traceable to a national or international standard or method.   |
| <b>FSM 18</b>   | Printed Material Control                              | Procedures shall be established, implemented and maintained to manage packaging materials printed with product ingredient list(s), allergens, identification code and other critical information and prevent mis-printing.  |
| <b>FSM 19.1</b> | Testing   | A procedure shall be established, implemented and maintained to ensure that analyses of food parameters critical to food safety are undertaken by competent laboratories and using appropriate sampling and testing methods and that such analyses are performed in accordance with the applicable requirements of ISO/IEC 17025. |
| <b>FSM 19.2</b> | Environmental Monitoring                              | A risk-based approach shall be in place to define the microbiological environmental monitoring programme which shall be established, implemented and maintained to reduce the risk of food contamination.   |
| <b>FSM 19.4</b> | Cleaning and Disinfection Programme                   | Cleaning and disinfection programmes shall be established, implemented and maintained. Measures shall be in place to verify the effectiveness of the cleaning and disinfection programme.   |
| <b>FSM 20</b>   | Internal Audit  | An internal audit procedure shall be established, implemented and maintained; it shall cover all elements of the Food Safety Management System.   |
| <b>FSM 21</b>   | Complaint Handling                                    | A procedure for the management of complaints and complaint data shall be established, implemented and maintained to ensure that complaints are assessed and corrective actions implemented, when necessary.   |

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| <b>FSM 22</b>   | Serious Incident Management | An incident management procedure, including product recall and withdrawal, shall be established, implemented and maintained. The recall procedure shall be regularly tested for effectiveness.                                    |
| <b>FSM 23</b>   | Product Release             | A product release procedure shall be established, implemented and maintained.   |
| <b>FSM 24.1</b> | Control of Non-conformity   | A procedure shall be established, implemented and maintained to ensure that any non-conformity impacting food safety and any non-conforming products are clearly identified and controlled to prevent unintended use or delivery. |
| <b>FSM 25</b>   | Corrective Actions          | A procedure shall be established, implemented and maintained for the determination and implementation of corrective actions in the event of any significant non-conformity relating to food safety.                               |

## SECTION 3: GOOD INDUSTRY PRACTICE REQUIREMENTS

| REFERENCE      | ELEMENT   | THE PROGRAMME SHALL REQUIRE THAT   |
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| <b>GMP 1</b>   | Site Environment  | The site shall be located and maintained to enable the reception, storage, production and distribution of safe food and to prevent its contamination.  |
| <b>GMP 1.4</b> | Site Environment  | The site shall be located and maintained to enable the reception, storage, production and distribution of safe packaging and to prevent its contamination.   |
| <b>GMP 2</b>   | Local Environment   | All grounds within the site shall be maintained to prevent contamination and enable the production of safe products.   |
| <b>GMP 3</b>   | Site Design, Construction, Layout and Flow of Operations    | The site, both the exterior and the interior, shall be designed, constructed and maintained to minimise food safety risks.<br>The layout and flow of operations shall be suitable for the intended purpose and designed in line with hygienic design principles to minimise food safety risks. |
| <b>GMP 4.1</b> | Product Contamination Risk and Segregation                  | Procedures shall be established, implemented and maintained to prevent or minimise risk of contamination and cross-contamination of purchased materials, work in progress, rework, packaging and finished product covering all aspects of food safety.   |
| <b>GMP 4.7</b> | Product Contamination Risk and Segregation                  | Procedures shall be established, implemented and maintained to ensure printed materials are not mixed or intermingled with other materials including in-process and reworked materials.  |
| <b>GMP 5</b>   | Employee Facilities   | Employee facilities including hand washing and toilet facilities, and public facilities where applicable, shall be provided, designed and operated to minimise food safety risks.  |
| <b>GMP 6.1</b> | Personal Hygiene, Protective Clothing and Medical Screening | Documented personal hygiene standards shall be established, implemented and maintained to minimise food safety risks.  |

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| <b>GMP 6.2</b>   | Personal Hygiene,<br>Protective Clothing and<br>Medical Screening | Suitable protective clothing and footwear shall be provided to minimise food safety risks.   |
| <b>GMP 6.3</b>   | Personal Hygiene,<br>Protective Clothing and<br>Medical Screening | A medical screening procedure shall be established, implemented and maintained to identify conditions impacting food safety and that any person affected shall immediately report illness or symptoms to management, subject to legal restrictions in the country of operation.  |
| <b>GMP 6.4</b>   | Personal Hygiene,<br>Protective Clothing and<br>Medical Screening | The requirements 6.1, 6.2, and 6.3 shall apply to employees, contractors and visitors commensurate to their impact on food safety.   |
| <b>GMP 7</b>     | Training  | Procedure shall be established, implemented and maintained to ensure that all employees including temporary workers and subcontractors are trained, and retrained as necessary to have an understanding in food safety, commensurate with their activity.  |
| <b>GMP 8.1.3</b> | Housekeeping, Cleaning<br>and Disinfection                        | Procedures for housekeeping, cleaning and hygiene disinfection shall be established, implemented and maintained. Its effectiveness in minimising food safety risks of cleaning shall be validated and verified, based on the risks associated with the product or activity. Cleaning activities shall not represent a packaging safety risk. |
| <b>GMP 8.2</b>   | Housekeeping, Cleaning<br>and Disinfection                        | Cleaning facilities, equipment and chemical materials shall be suitable for their intended use and shall be stored and used appropriately.   |
| <b>GMP 10</b>    | Site Inspections/Checks   | A programme of site inspections/checks shall be established, implemented and maintained to ensure the site environment and processing equipment are maintained in a suitable condition to ensure food safety, as applicable to the activity of the site.   |
| <b>GMP 11</b>    | Air and Water Quality   | Air, compressed gases, and water (including ice and steam) in any form which could impact food safety shall be regularly monitored, and adequately stored and handled in order to minimise food safety risks. Water not intended for use in food production, if available on site, shall be managed to minimise food safety risks.           |

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| <b>GMP 12.1</b> | Waste Management | A procedure shall be established, implemented and maintained for the collection, storage and disposal of waste material, including waste water and drainage ensuring they do not pose any food safety risks.                        |
| <b>GMP 12.2</b> | Waste Management | A system shall be in place to control the disposal of trademarked material.   |
| <b>GMP 13</b>   | Pest Control     | A procedure shall be established, implemented and maintained to prevent, monitor and control or eliminate the risk of pest infestation at the site.   |
| <b>GMP 15</b>   | Transport        | All containers and vehicles used for transportation in a way that could impact food safety shall be designed, constructed, monitored and maintained to minimise food safety risks. They shall be suitable for the intended purpose. |
| <b>GMP 16.3</b> | Storage          | Packaging shall be held or stored in designated areas and handled under controlled conditions to minimise food safety risks.  |
| <b>GMP 17</b>   | Stock Management | A procedure shall be established, implemented and maintained to ensure that purchased materials, work in progress and finished products are used in the correct order, and within the allocated shelf life when applicable.         |
| <b>GMP 18</b>   | Equipment        | Equipment shall be suitable for the intended purpose. Equipment shall be designed, constructed, maintained, used and stored to minimise food safety risks.  |
| <b>GMP 19</b>   | Maintenance      | Effective planned maintenance shall be in place for the site and equipment to minimise food safety risks. Maintenance activities shall not represent food safety risks.   |