






CERTIFICATION GUIDE

GLOBAL STANDARD PACKAGING MATERIALS
(Issue 6 - August 2019)

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CONTROL PROGRAMME
Packaging Material – Issue 6 - August 2019

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1. CERTIFICATION SYSTEM OF PACKAGING MATERIALS (Issue 6)

1.1 APPLICATION PROCEDURE

Once ACERTA is aware of the interest about the certification in accordance with Global Standard Packaging Materials by a company, ACERTA Administration Department will contact this company to request some basic information that will let ACERTA make the appropriate quotation. In order to make the process easier, the applicant may use the document "**Information Request Form**".

Next, an appropriate quotation is made by using the ACERTA management computer system (SIG), to be then reviewed by the Administration Manager.

The quotation includes the costs derived from the certification process and a specification of the items detailed in the said costs: application procedure, file opening, certification inspection, certification decision-making process, issue of the certificate, and, at the customer's request, a previous inspection of the facilities. The method of payment and the BRCGS fees, paid by the customer through ACERTA, are also specified in the quotation.

The applicant who wishes to begin the certification process shall send this quotation appropriately accepted. The Technical Department includes then the accepted quotation in the SIG and files the document in hard copy in the appropriate folder.

Once the approved quotation is received, the Technical Department sends the applicant the "**Certification Request Form**", to be sent back to ACERTA duly filled in. This form includes all relevant details concerning the scope of the certification, like e.g., "**products produced**", "**manufacturing processes**" and "**m2 of manufacturing facilities**" and "number of employees" to be certificated, and it also includes a link to the "**BRC PM Certification Guidelines**" and to the "**User Guidelines of ACERTA Hallmark**".

Together with the "Certification Request Form", the "**SGC Certification Agreement**" is sent. This document establishes the conditions that will regulate the commercial relationship between ACERTA and the applicant company. The duration of the agreement will be 1 year. The applicant shall send back ACERTA this "**SGC Certification Agreement**" duly dated, signed, and if possible, sealed.

These documents will be accepted by ACERTA either received by mail (original document).

The Technical Department will then review the "**Certification Request Form**" sent by the customer, and once this document is checked, a file will be opened in the SIG, assigning a code automatically. The file code assigned is made up of the acronym "BRC", the code of the customer, the digits of the year in which the certification is made and a correlative number to identify the works undertaken in that site.

E.g., **BRCP.000582-10/002**

Then, a folder is opened for each certification applicant, identified with the appropriate code, so that the hard copies are adequately filed and maintained. The electronic records will be also filed in the appropriate computer folder.

The Manager of the Technical Department (or the Technical Manager Assistant in his absence) will then draw up a plan for the auditing work by using the SIG from the review of the "**Certification Request Form**". He will assign the auditor, determine the working days needed for the audit, define the specific time established for the audit and inform the auditor or auditor team in writing through the "**Audit Order**". Likewise, he will ensure that no site is audited more than 3 consecutive times by the same auditor, unless exceptional circumstances like audits in special or remote areas. All exceptions shall be clarified in the appropriate "**Audit Report**".

The audits against the Global Standard Packaging Material may be conducted either by ACERTA own staff or by external auditors (subcontracted and with exclusivity with ACERTA), provided that they are previously approved by BRCGS and ACERTA for the certification of the standard.

Then, every auditor is responsible for arranging the specific previous / certification audit date, by following the instructions detailed in the "**Work Order**".

The Technical Department will add all booked audits on the Directory a minimum of 7 days before the audit takes place, for announced audit dates a minimum one day before due date, and for unannounced audits at least 28 days in advance of the due date.

1.2 CERTIFICATION AUDIT

Once all relevant aspects of the audit and the assessment of the documents provided by the applicant company have been determined, the auditor will draw up the “**Audit Plan**” to be sent both to the applicant and to ACERTA Technical Department. In the event that the applicant does not agree with any aspect detailed in that document, he/she will be able to communicate it within 3 days after its reception. In this case, the auditor or the Technical Department, and the applicant, shall have to reach an agreement, and a new “**Audit Plan**” will be issued.

The applicant is aware that only the auditors identified in the Audit Plan or equivalent document can perform the audit and commits to report immediately ACERTA in case of any incidence in this regard, as well as prevent access to the facilities of persons who claim to act on behalf of ACERTA but who are not identified in the aforementioned documents.

The auditor will then perform the audit by using the document: “**Audit Checklist**” in accordance with the Global Standard Packaging Materials.

The onsite audit is made up of the following steps:

1. Opening meeting: to confirm the scope and process of the audit.
2. Document review: a review of the documented HARA (Hazard Analysis and Risk Assessment) and quality management systems.
3. Traceability test, including a vertical audit of associated production records. The customer shall be able to achieve full traceability in a timely manner.
4. Traceability challenge – including a review of all relevant records of production (e.g., raw material intake, production records, finished product checks and specifications).
5. Traceability challenge – including a review of all relevant records of production (e.g., raw material intake, production records, finished product checks and specifications). This is a vertical audit – as specified within the BRCGS guidance document on audit techniques.
6. Review of the production facility inspection – to verify and conduct further documentation checks.
7. Final review of findings by the auditor(s) – preparation for the closing meeting.
8. Closing meeting: to review audit findings with the company. Non-conformities are subject to subsequent independent verification by ACERTA Senior Management. A written summary of the non-conformities discussed at the closing meeting will be documented by the auditor in the “**Final part of Checklist**”.

Senior managers with the appropriate authority to ensure that corrective action can be progressed shall attend both opening and closing meeting.

1.3 PRELIMINARY AUDIT REPORT AND CORRECTIVE ACTION PLAN

Once the audit is finished, the auditor will issue the “**Preliminary Audit Report**”, based on the “**Audit Checklist**”. This report will be made in computer format and sent (PDF format) to the customer together with the document “**Corrective Action Plan**”, **within 2 weeks after the audit**.

The auditor shall include in this report the **type** and **number** of non-conformities found during the audit.

Following each audit, ACERTA will confirm the completion on the BRCGS Directory within 10 calendar days. Details shall include the date of the audit, the audit scope and the non-conformities found.

The auditee shall then draw up and submit the “**Corrective Action Plan**” together with the **objective evidence** needed to solve the non-conformities and the root cause of non-conformities **within 28 calendar days** from the first date of the audit. For initial audits (1st audit) **up to 90 calendar days** are allowed.

The “**Corrective Action Plan**” and the objective evidence shall be easily accessed for reading, clear and accurate. If not, they will be sent back to the auditee.

If the “**Corrective Action Plan**” is not approved, or the objective evidence provided are not adequate, ACERTA will be able to undertake a “**Follow-up audit**”. At the time of this “**Follow-up audit**”, the auditor will only focus on the outstanding non-conformities, so that he/she will check whether the company has solved the non-conformities arisen during the previous audit or not.

1.4 AUDIT REPORT

Once the “**Corrective Action Plan**” has been assessed by the auditor, an “**Audit Report**” will be issued (including a positive or negative recommendation by the auditor/person in charge of the technical review) and this report will be sent to the person(s) responsible for the certification decision.

For every audit undertaken, the appropriate audit report will be issued, complying with the format defined by the BRCGS organization. The report will be issued in English language and/or, when appropriate, in a different language, depending on the needs of the auditee.

The report language of parts 1 and 2 shall always be provided in English, with any other required languages placed after the English text.

The following sections must be completed in English but can include a translation following the English statement:

Scope

Major changes since last BRCGS audit

Reasons for deviations from typical audit duration

Company profile (Be aware that this box has a maximum size of 2,000 characters, but space outside the tagged fields may be used.)

Nonconformity and corrective action details

Where both the auditor(s) and the users of the report require the report in another language, providing the detailed section of the report (part 3, the summary) in the language of the user is acceptable although there may be a requirement to translate parts of the report into English if requested by the BRCGS for quality control checks.

The report includes the following sections:

- **PART 1: AUDIT DETAILS** (IN ENGLISH LANGUAGE)
- **PART 2: SUMMARY OF NON-CONFORMITIES/CORRECTIVE ACTION PLAN** (IN ENGLISH LANGUAGE)
- **PART 3: DETAILED AUDIT REPORT** (SECTION SUMMARIES IN ENGLISH LANGUAGE).

The report shall accurately detail the findings obtained by the auditor at the time of the audit. The section “Detailed audit report” of the report shall include summaries for all sections describing the procedure and objective evidence.

The reports shall be drawn up and sent to the customer within 42 calendar days after the completion of the full audit unless special circumstances occur.

ACERTA shall send the customer the “**Audit Report**” after the certification decision, and a copy of this report will be kept in a safe place for 5 years together with any other document connected with it.

The “**Audit Report**” shall not be reproduced fully or in part by ACERTA without the written permission of the holder (unless the law so requires); express consent may be given as a part of the contract between the company and the user, or between the company and ACERTA.

1.5 CERTIFICATION DECISION

In order to make the certification decision, the appropriate responsible person, according to the structure detailed in the quality procedure SGC “Assessment of results, certificate awarding”, shall take into account what is described in the chapter 3 of this document.

To begin the certification decision process, the Technical Department is in charge of collecting all documents to be assessed, which shall include, at least, “**Certification Request Form**”, “**Audit Report**”, “**Corrective Action Plan**” and objective evidence.

The Technical Department shall be responsible for the file and for the process to be completed, providing the person responsible for the “**Technical Review and Certification Decision**” all documents needed.

1.6 NOTIFICATION OF CERTIFICATION DECISION AND CERTIFICATE OF CONFORMITY

ACERTA shall assess all information included in the file of the applicant and shall detail the decision made in the “**Technical Review and Certification Decision**”. Once the certification report has been issued, the Technical Department shall inform the applicant, **within 42 calendar days** after the audit, of the certification decision.

When the decision is positive, the “Certificate of Conformity”, appropriately signed by ACERTA representative, will be sent to the holder together with the “Audit Report”, once the payment has been confirmed. The certificate will be valid from the issue date detailed in the document, for 6 or 12 months, depending on the grade obtained. The certificate will be issued for every specific production facility, and the audit grade awarded, the scope of activities and the manufacturing category(ies), defined in the Appendix 4 of Global Standard Packaging Material (Issue 6) will be indicated.

In case of a failed audit, the grade of the non-conformities will be reviewed in an ACERTA independent certification process in **two days after the audit**.

The certificate shall comply with what is established in the Appendix 4 of the standard and with the user guidelines in relation to BRCGS and ACERTA logos. Its compliance will be verified during the audit, and the findings obtained will be detailed in the section “Company Profile” within the “Audit Report”.

The certificate shall always include the following information:

- ACERTA Certificación, S.L. logo or name.
- The logo of the Accreditation Body responsible for the accreditation under UNE-EN ISO/IEC 17065 to certify Global Standard Packaging Material (*once the accreditation is obtained*)
- BRCGS logo.
- ACERTA Certificación, S.L. name and accreditation number (*once the accreditation is obtained*)
- Name, SITE CODE and address of the site audited.
- Name of the lead auditor number.
- Product certification scheme, that is, GLOBAL STANDARD for PACKAGING MATERIALS, Issue 6 – August 2019
- Audit scope (activities and manufacturing categories).
- Inclusion of voluntary additional modules (when appropriate)
- Exclusions from scope.
- Audit programme (announced, unannounced or reissued after extension to scope).
- Grade obtained.
- Audit date/s (day/month/year) In the event of an extension to scope, it includes the original audit date and the re-audit (visit) date.
- Certificate issue date (day/month/year).
- Re-audit due date (day/month/year). From to
- Certificate expiry date (6 or 12 months from the certificate issue date, as appropriate), (day/month/year).
- Name and signature of ACERTA manager /representative.
- Place and date of signature.
- Full name and address of ACERTA.
- Certificate number (traceable reference).
- The text “This certificate is property of ACERTA Certificación, S.L.”.
- The text “If you would like to feedback comments on the Global Standard or the audit process directly to BRCGS, please contact enquiries@brcgs.com”
- In case of reissue “Reissued after extension to scope/ Reissued for company name- address- change”

The audit, the “Audit Report” and the “Certificate of Conformity” will be specific for the “manufacturing site” and its products.

ACERTA will advise the **certificate** holders to verify the scope detailed in the certificate, so that the information shown meets the company's own requirements. Although the certificate is granted to the company, it will be property of ACERTA, the one to control its use, ownership and display.

The company has the right to appeal the certification decision made by ACERTA, and any appeal should be made, in writing, and sent within 7 calendar days from the reception of the certification decision.

In the event that the interested party does not agree with the decision, ACERTA Technical Department will give him/her the appropriate format established for appeals. The appeals will finish within 30 calendar days after its reception. The appeal procedure as described within ACERTA internal quality procedure: SGC "Complaints, Appeals, and litigation" will begin once the appeal record, adequately completed, is received. Once a detailed and exhaustive investigation process on the subject is finished, the definitive answer will be communicated in writing to the company.

In the event of an unsuccessful appeal, ACERTA has the right to charge costs for conducting the appeal.

ACERTA will upload the audit relevant data and the "**Audit Report**" in the BRCGS Directory within 49 calendar days from the date of the audit.

In the event that the customer does not make the appropriate payment of the audit, the "**Audit Report**" will not be uploaded in the BRCGS Directory, and this circumstance (non-payment) will be detailed in the "Comments" section. Its status (certificated) will not be public. No "**Certificate of conformity**" will be issued and no "**Audit Report**" will be available for this customer.

In the event a site notifies ACERTA of any:

- legal proceedings with respect to product safety or legality
- product recall
- significant damage to the site (e.g., natural disaster such as flood or damage by fire)
- change of ownership
- significant change to the operation or scope.

ACERTA will assess whether the incident is indicative of a failure of the site's systems, take the necessary steps to fully understand the implications of the situation and take appropriate actions. This may include requests for additional information, a further visit to the site, further full or partial re-audits, suspension or withdrawal of the BRCGS certificate.

ACERTA has a documented procedure for dealing with incident notification that sets out the processes and responsibilities for handling information provided by certificated sites ("IT Notificación de incidentes BRCGS").

ACERTA will notify BRCGS of all incidents (including product recalls) using the report located at. BRCGS Directory Initial notification to BRCGS will be made within 48 hours of the site notifying ACERTA. The confirmatory email indicating that it has been successfully sent will be maintained by ACERTA.

If there is a significant delay between notification of the incident and completion of root cause analysis (which is probable with many incidents), ACERTA will provide BRCGS with a summary of the available information, completing as much of the report as possible, within the 48 hours mentioned above. The remaining information (e.g., the root cause and subsequent preventive actions) will be added to the report at a later date, using the link that is included in the confirmation email. This update will be completed within 3 weeks.

1.7 EXTENSIONS TO SCOPE

Once the certification has been granted, any additional significant product manufactured or process undertaken by the site that are required to be included in the scope of certification, shall be communicated to ACERTA, who will evaluate the possibility of issuing a direct extension of the current scope of the necessity of conducting an on-site scope extension audit ("**Follow-up audit**") to examine the aspects of the required extension to scope.

A "**Follow-up audit**" will be required always when any of the following circumstances is met:

- Inclusion of new manufacturing facilities not taken into account in the original audit
- Inclusion of new processing technology (e.g., printing by lithographic technology where formerly only flexographic printing was within scope)

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- Inclusion of new products that pose a significant new risk.

The current "**Certificate of conformity**" will be superseded by a new certificate using the same expiry date detailed in the original certificate.

The certificate shall include identification that it was a scope extension and the date of the visit.

1.8 CERTIFICATION MAINTENANCE: RENEWAL

Once the validity of the certificate expires (1 year in the case of certificates with "A" and "B" grades, and 6 months in the case of certificates with "C" and "D" grade), the certification maintenance process begins.

For this purpose, about 6 months before the renewal date, ACERTA Technical Department will inform the certificate holder of the new activities to be carried out to maintain the certification. A new "**Certification Request Form**" will be sent so that the current scope is detailed.

The Technical Department will contact the company to agree the date of the renewal audit. All appropriate steps will be taken by following the same criteria used for the previous certification audit. A due audit date will be agreed sufficiently in advance from the calculation of the date of the initial audit so that the certificate does not expire (from 28 days before initial audit date).

1.9 BLENDED AUDITS

Regardless of the degree previously obtained, and only in renewal audits and in the announced program, ACERTA and the company can decide whether to offer or accept the "**Blended Audit**" option. The blended audit is an audit that comprises a remote off-site assessment followed by an on-site audit.

All blended audits are announced. It is not possible to complete a blended audit as part of the unannounced audit programme.

Before planning the remote audits, ACERTA will consider the willingness of the client organization to give its consent to the remote auditing application through the use of ICT (Information and Communication Technologies) and the availability of ICT to be able to effectively complete this part of the audit. The use of a blended audit will be agreed between the two parties.

ACERTA will carry out a risk assessment to determine if a blended audit can be performed on the company. If the risk assessment is favorable, ACERTA will issue a work order to the designated auditor. ACERTA will establish the technical requirements for the remote audit. ACERTA will conduct a test meeting with the same media platforms to ensure that the scheduled remote audit can be performed as planned.

1. ONLINE Audit

ACERTA will carry out the remote audit before the on-site audit, always within 56 days prior to the due date of the audit (the separation between the remote audit and the on-site audit will not exceed 28 days).

During the remote audit it will be performed:

- Document Review. During the remote audit, the green requirements of the Standard should be audited.
- Interview / discussion with staff, for example, to discuss the document, policy or record being audited

2. ONSITE Audit

The on-site audit will take place within 28 days of the remote audit.

- Inspection of production facilities - to review practical implementation of systems, including observation of product change procedures and interview of personnel.
- Identified requirements for on-site audit (oranges) and during risk assessment.
- A review of the documentation necessary to complete a vertical audit including a traceability test (e.g., pest control records).

The total duration of the audit is the same as specified in the standard. ACERTA will divide this duration into time spent on on-site and remote auditing. The duration of the remote audit will not exceed 50% of the total duration of the audit in any case.

The site will present to ACERTA the evidence of the measures adopted to correct the non-conformities identified in the remote and on-site audit within 28 days of the on-site audit.

ACERTA will create an audit report that will include all the summary information and the results of the remote and on-site audit.

The rating awarded will be based on the total number of identified non-conformities (sum of the non-conformities identified in the on-site and remote audit) and in accordance with the audit protocol announced in the Standard.

Non-conformities identified during the remote audit, which have been closed and corrected prior to the on-site audit, are included in the rating calculation.

For additional voluntary module 10" Plastic pellet loss prevention", the blended audits are not permitted, Onsite audit only.

1.10 REMOTE AUDITS DURING A PANDEMIC AND SEVERE EVENT RESTRICTIONS OR DUE TO COVID-19

ACERTA will follow this evaluation protocol completely remotely to help mitigate the impact of Covid-19 access and movement restrictions; until access to the site is safely available.

This procedure applies to existing certificated sites who are genuinely unable to receive a physical audit because the site is located in a country or region where government advice/restrictions prevent movement or access to the site.

This process is not applicable to sites not currently certificated to BRCGS.

ACERTA will follow any government guidance in place for the region or country applicable.

ACERTA will perform all remote audits in an "announced" manner at a date and time agreed with the site.

Where the site is operational, but a physical audit may not occur on or before the audit due date and will result in existing certificates expiring, a certificate extension of up to a maximum of 6 months validity may be issued based on:

- The successful completion of a risk assessment by ACERTA confirming it is appropriate to continue certification.
- ACERTA completing a discussion with the site, and review of procedures that have been implemented. The purpose of the discussion and review is to assess the impact of COVID-19 extraordinary circumstances to the site operations and confirm the effective implementation of any emergency response plan.
- The previous audit undertaken at the site was a physical audit (i.e., Fully onsite or blended). **A site cannot request for a certificate extension if the previous audit was a remote audit.**
- A request for a concession must be approved by BRCGS and must include justification for the extension and a date when an onsite or blended audit will take place. Sites that are currently certificated with a grade **C or D**, these shall be classified as 'high risk' **and certificates may not be extended.**

ACERTA will issue a work order to the designated auditor.

ACERTA will establish the technical requirements for the remote audit. ACERTA will conduct a test meeting with the same media platforms to ensure that the scheduled remote audit can be performed as planned.

ACERTA will require portable capacity for live visual transmission from the site, including in production and storage facilities, as well as audio capacity.

ACERTA will establish an adequate duration of this audit according to the complexities of the site and sufficient to adequately cover the aspects to be audited.

Once the site becomes accessible, the full audit (fully onsite or blended option) will need to take place as normal. This should be planned for the earliest possible dates following the lifting of the Covid-19 restrictions and agreed with BRCGS

during the concession process. It is not necessary to wait for the 28-day audit window prior to the extended audit due date.

For unannounced audits – the audit may occur on any date from the site agreement that an audit can occur, until the 28-day window prior to the audit due date. The exact date is not communicated to the site. The exact date is not communicated to the site. Where it is not possible to accommodate an audit until the 28-day audit window, then the audit shall be announced.

Where a site remains inaccessible and an onsite audit is still not possible after the certificate extension, a remote audit may be permitted. A concession must be agreed with BRCGS.

Where a new certificate is achieved, the certificate expiry will be 6 or 12 months from the audit date, in accordance with the normal protocol in the Standard.

Consecutive certificate extensions are not possible, however, there may be justifiable circumstances where a 2nd certificate extension is required following a regular onsite or blended audit cycle. For example, a site may receive a certificate extension, followed by an onsite audit as normal, followed by another certificate extension. In this case, please contact BRCGS to discuss a concession each time a certificate extension is required.

Where an onsite or blended audit is not possible prior to the audit due date, and the site has already received a certificate extension, the site may opt for a fully remote audit (according to BRCGS086). A concession must be agreed with BRCGS for a remote audit with full details of justification. An onsite or blended audit must be arranged at the earliest opportunity; therefore a certificate of 12 months duration will not be given. Expiry dates will be based on individual circumstances and agreed during the concession process.

Where justified COVID-19 related issues affect audit planning and results in a late audit:

- The audit may be completed up to 21 calendar days late. In this situation, no concession is required, and a non-conformity for the late audit will not be given.

- Where the audit will be more than 21 calendar days late, a non-conformity will be issued unless there is sufficient justification to allow a concession. Any concessions must be agreed in advance with BRCGS.

Reaudit due dates will remain unchanged despite any late audits carried out.

Non-conformities and audit result

ACERTA will assign the same level of non-conformance to a requirement of the Standard following the normal protocol within the Standard regarding severity.

The site must provide evidence of corrective actions, root cause analysis, and a preventive action plan and be submitted to ACERTA within 28 days.

Audit report and certificate

ACERTA will document the audit on the report template and upload it to the BRCGS directory within normal time frames.

The certificate will have an expiration of 6 or 12 months from the audit date according to the normal protocol specified in the Standard, unless the site requests an earlier expiration date to realign the audit expiration date with the time of the preferred year.

ACERTA will issue a certificate and will indicate that the remote audit option has been used.

ACERTA will schedule the next BRCGS audit using normal audit cycles.

1.11 COMPULSORY UNANNOUNCED AUDITS

As a new GFSI requirement, ACERTA will conduct 1 unannounced audit every 3 years on each certified company, regardless of the degree obtained, as of February 1, 2021.

Therefore, after these dates, following that issue of a certificate, ACERTA will notify the site whether their NEXT assessment will be announced or unannounced. For example-if a site has an announced audit due in June 2021 this will go ahead as usual. After this audit and certificate decision, the site automatically joins to the 1 in 3 programme and will be notified whether the next audit will be announced or unannounced.

The site must have at least one unannounced audit during 2021 – 2024, subsequent unannounced audits occurring at least every 3 years. For sites with annual (12 month) audits, this will result in at least every 3rd audit being unannounced.

Sites that have opted into the fully unannounced audit programme are not affected by this change and will continue to follow the unannounced audit protocol outlined within the Standard they are certificated to. Where a site chooses to revert to the announced audit programme then these requirements will apply.

Where a site needs an extension scope, separate from the scheduled annual audit, for example due to the introduction of a new product or process this may be completed as an announced audit.

ACERTA will decide which mandatory unannounced audits should be performed each year. ACERTA will notify the chosen production centers within 3 months of the last audit, to ensure that the site knows if an unannounced audit will take place in the next year.

ACERTA may carry out the unannounced audit at any time during the 4 months prior to the due date of the audit.

ACERTA will ask the site to indicate a maximum of 10 days when they are not available for an audit. Sites with a 6-month audit program (for example, grades C or D) can nominate a maximum of 5 days.

Unannounced audits, means 'no notice given' in advance of the audit. However, there are certain circumstances where the site operation will provide some challenges in meeting all the requirements:

- when travelling to different countries, and visas are required which necessitate a site 'invitation letter' containing details such as dates of visits, hotel and travel arrangements.
- remote or inaccessible sites where the practical logistics of arranging travel or accommodation necessitate arrangements being made by the site, as they are not serviced by 'public transport' or accessible by standard travel means such as a car, or the site is remotely located and there is no accommodation available, and the auditor will have to be hosted by a member of site staff.
- auditor safety - travel in some parts of the world, needs careful security measures and arrangements, such as local guides provided by the site to ensure personal safety.
- a transitory workload with intermittent operations, such as fish canneries where production will be dependent on the arrival of a ship or influenced by the weather

In all such cases full details shall be discussed with BRCGS in advance of the audit to agree best practices. Where necessary a concession may be agreed.

Scope

This audit will, as for the normal annual audit, **examine all aspects** of the company's systems against the requirements of the Global Standard Packaging Materials. The audit will be undertaken without prior notice and no audit plan will be sent. The grading criteria will be the same as for an announced audit.

Audit duration

Being a full scope audit, the estimation of the audit time will be made from the parameters detailed in the duration calculator.

Audit performance

The method used for optional unannounced audits is the same than that of the announced audit.

When a company has a separate central office audit prior to the audits of its individual production sites, ACERTA may complete the central office audit as an announced audit (only production site audits should be unannounced).

Frequency

ACERTA will conduct 1 unannounced audit every 3 years against the Standard.

ACERTA will suspend the site's certification if the auditor arrives for the audit and is denied access. The site will remain suspended until a new unannounced audit can be completed. ACERTA will perform the new unannounced audit within the next 4 months after the rejected audit.

Audit dates are expected to be added to the BRCGS Directory a minimum of 7 days before the audit takes place.

1.12 OPTIONAL UNANNOUNCED AUDITS

In order to demonstrate confidence in their quality and safety systems, the companies may choose to participate in the **optional unannounced audit programme**.

The decision to participate in this scheme depends exclusively on the company and is open to any site that is currently awarded a **certification Grade AA, AA+, A, A+, B, B+, C o C+, D o D+** and to non-certified companies during the regular annual audit. Sites that are not currently certified shall take into account that it is possible that the audit "has no place in the period of one year from the date of application".

Successful completion of the audit will result in the awarding of **certification grade AA, A, B, C o D**. The unannounced audit will be distinguished by a (+), so companies completing the audit successfully will be awarded **AA+, A+, B+, C+, o D+ Grades**, where + **indicates an unannounced audit**. This grade will be detailed in the Certificate, which will supersede the existing certificate, to be then revoked.

The applicant company shall choose the appropriate option in the "**Certification Request Form**".

- This option involves a single unannounced audit against all the requirements of the Standard with complete duration in accordance with audit duration standards.
- The site shall notify ACERTA within 3 months of the last audit date, either by the "**Certification Request Form**" or contacting the Technical Department.
- This option allows for a number of days (up to 15) to be blocked out from the audit plan as non-audit days. ACERTA shall be informed of these "non-audit dates" at the time of opting for the unannounced audit programme by the customer. The dates shall be provided at least 4 weeks in advance and appropriate justification shall be provided as well. Those days when the factory is not operating (e.g., weekends, public holidays, planned shutdowns for site holidays or maintenance) will not be included within these 15 days, but must be notified to ACERTA.
- The Technical Department Manager (or the Quality Manager in his absence) or Auditor Coordinator, will schedule the unannounced audit by using the SIG from the review of the "**Certification Request Form**", to then assign the auditor team, determine the working days needed for inspection, define the audit dates and communicate, in writing, the auditor or auditor team assigned, all through the "**Work Order**".
- The dates for performing the unannounced audit shall be chosen between months 3 and 12 of the audit date; this shall typically be within the last four months of the certification cycle.
- The auditor shall appear in the production facility in the appropriate date and shall begin the audit without prior notice. The site shall be obliged to accommodate the auditor and allow the audit to start immediately on arrival to the site. If not, ACERTA will charge the costs of this audit to the customer, and the site will revert to the announced audit scheme. At the discretion of ACERTA, the existing certificate may also be suspended or withdrawn.
- The audit will begin with the site production facility inspection (it will normally proceed to the production factory inspection within 30 minutes of arrival).
- the rest of the process shall be the same as described within sections 1.4 to 1.7, within the general audit protocol with the exception that the "**Audit Report**" and "**Certificate of conformity**" will specify "Unannounced audit".
- The new certificate shall be issued within 42 days of the audit and will have an expiry date based on the expiry date of the previous certificate plus 12 months, providing the company remains within the unannounced audit scheme. If the company decides to return to the announced audit programme or is awarded a "C" Grade, the certificate expiry date will be based on 6 or 12 months from the date of the unannounced audit.
- ACERTA will discuss audit options with sites and notify them which year an unannounced audit will take place. This discussion must occur within 3 months after the last audit, to ensure that the site knows if an unannounced audit will take place in the coming year.
- Where a company has a separate Head Office audit prior to the audits of its individual production sites, the head office audit may be completed as an announced audit (only the production site audits must be unannounced). ACERTA will schedule the head office audit prior to the start of the unannounced audit window at the first site to ensure that the full audit window remains available for the site audit.
- Where a site has included additional modules within the scope of the audit, the audit protocol for the specific module applies. The audit of the module can be completed as part of the BRCGS PM audit and can therefore be completed unannounced when the audit of the Standard is unannounced. Where a site needs an extension to scope audit, separate from the scheduled annual audit, for example, due to the introduction of a new product or process, this may be completed as an announced audit.

1.13 VOLUNTARY MODULES

The Standard has been designed to enable the addition of voluntary modules to the routine audit. The voluntary modules will enable sites to demonstrate compliance to specific sets of requirements in order to meet specific market or customer requirements.

The certification body shall be notified in advance of the audit that a particular voluntary module is intended to be added to the scope of the audit. This ensures sufficient additional time can be scheduled and that an auditor with the appropriate qualifications for the additional module is selected. The site shall ensure that the production programme at the time of the audit covers products for the intended voluntary module where this is applicable.

When these voluntary modules are used, they will be detailed within the scope of the audit report and certificate of conformity. When the voluntary modules are not included in the audit, they do not need to be identified as exclusions.

For the voluntary modules that are not certified under accreditation, ACERTA will issue an independent certificate.

The site shall ensure that the production programme at the time of the announced audit covers products for the intended additional module where this is applicable. Where the site has opted into the unannounced audit programme, detailed information shall be given to ACERTA regarding production planning so that an appropriate audit date can be selected. At its discretion, where there is a lack of information or potential for choice of audit dates, ACERTA may be unable to accommodate the request for the additional module at the unannounced audit.

Note that the modules are certificated separately from the Standard; however, where certification to the Standard is not achieved, certification for the module cannot be awarded, irrespective of whether the requirements of the module have been met.

Standalone audit planning for the additional module

Additional modules are designed to be undertaken with the audit for the BRCGS PM. Where it is not possible to undertake the audit for the additional module at the same time as BRCGS PM (e.g., when the requirement for the additional module occurs after the BRCGS PM audit has been completed), a standalone audit can be undertaken. (i.e., a return visit to the BRCGS PM certificated site, not in combination with the Standard audit).

A standalone audit is only permitted for the initial audit of that module. Subsequent audits for the additional module must occur at the next BRCGS PM audit and follow the selected certification option.

Ideally the same auditor who undertook the BRCGS PM certification audit of the site should undertake the standalone audit for the additional module. Where this is not possible, ACERTA shall have adequate processes in place to ensure the new auditor is familiar with the BRCGS PM audit that has taken place including review of the BRCGS PM audit report and discuss the site and any areas of potential concern with the previous auditor as preparation.

Reference shall be made to the relevant audit duration calculators when planning the module. **It is expected additional time shall be allocated to account for the opening and closing meetings and any additional requirements that may be relevant.**

Uncertificated sites cannot have a standalone audit for an additional module. The site must get certificated to BRCGS PM and include the additional module in the scope of the initial audit.

The standalone audit shall be conducted along the same principles as the original audit:

- Opening meeting confirming the scope and structure of the audit
- Inspection of the site. (As specified in the additional module requirements)
- Documentation trails and challenge of evidence of compliance to requirements
- Closing meeting confirming the next steps and what is required from the site, including timelines to confirm outcome of the audit.

Identified non-conformities shall be documented and actioned within the normal protocol of BRCGS PM (i.e., The site has 28 days to provide appropriate evidence of a close out and the CB should review the information and confirm the decision in the normal manner).

If practices are seen during the audit that give the auditor cause to doubt continued compliance to BRCGS PM, then non-conformities against the Standard may be raised which require close out. This would not affect the current grade of the certificate in force. However, if a high number of non-conformities are identified then action on the BRCGS PM certificate may be taken and further activities such as a full re-audit may be required. Where a critical non-conformity is identified then ACERTA shall withdraw the current certificate and arrange a full re-audit of the site.

Audit duration

In order for the voluntary modules to be included within the audit programme additional time will be needed for the audit. ACERTA shall indicate the expected additional time requirement for audit planning in the "**Work Order**".

Module number	Module title	Typical required duration (in hours)
8	Environmental Awareness	4-8
10	Plastic Pellet Loss Prevention	2-4

Additional Activity	Typical required duration (in hours)
Ethical Trade & Responsible Sourcing (ETRS) Risk Assessment	4

Critical non-conformities

If a critical non-conformity is identified against a requirement of the module, then the site cannot be certificated for this module without a further full audit of the module.

Where this occurs at a site which already holds certification for the module, certification of the module must be immediately withdrawn. If it is a requirement of customers that they shall be informed when their suppliers have a critical non-conformity identified or fail to gain certification against a module the company shall immediately inform its customers.

Note a critical non-conformity against a requirement of a voluntary module does not necessarily prevent certification against the main Standard or other voluntary modules.

Major and minor non-conformities

A voluntary module cannot be included on a certificate until major and minor non-conformities have been demonstrated as having been corrected, either permanently or via a temporary solution that is acceptable to the certification body.

Close-out of non-conformities can be achieved either by objective evidence being submitted to the certification body, such as updated procedures, records, photographs, or invoices for work undertaken, or by the certification body undertaking a further on-site visit.

If satisfactory evidence is not provided within the 28 calendar-day period allowed for submission following the audit, certification for the module will not be granted. The site will then require a further full audit in order to be considered for certification of the module.

There will be no grading of the voluntary modules. The modules will either be certificated or not.

Any non-conformities identified when assessing a voluntary module shall not be taken into account when deciding the grade for certification against the Global Standard Packaging Material.

Following each audit, a written report shall be prepared in the agreed format for the particular module, and this will form an addendum to the Global Standard Packaging Material. audit report. The addendum report shall be produced in English or in another language, dependent upon user needs. Where the report is produced in a language other than English, any applicable audit summary sections shall, in addition, always be reported in English.

The report addendum covering the requirements for the voluntary module shall be prepared and dispatched to the company within 42 calendar days of the completion of the full audit.

The full BRCGS audit report together with the addendum for the voluntary module shall be uploaded to the BRCGS Directory in a timely manner irrespective of whether a certificate is issued. The owner of the audit report may allocate access to the audit report with addendum to customers or other parties in the directory.

1.14 NO CERTIFICATE ISSUED

The certificate may be not issued by ACERTA due to:

- ✓ The number and/or type of non-conformities raised at the audit are greater than permitted for certification.
- ✓ The site fails to submit appropriate corrective actions in a timely manner or
- ✓ The site fails to allow a revisit to the site to confirm corrective actions have been completed •

-
- ✓ Where a full audit is not completed

In all cases the certification decision process should be undertaken as normal i.e., confirming the certification decision and should be completed as soon as possible.

At the subsequent audit, the audit report must include the correct details of the previous audit date and grade. The site is required to provide these details to any new Certification Body. Clarification of a site's history may be sought from BRCGS if required. ACERTA must ensure that they check that the non-conformities identified at the previous audit have been adequately addressed.

This previous audit date should be taken into account when considering any requirements for undertaking audits within the due date e.g., potential non-conformities for late audits may not apply.

The new certificate generated for this subsequent audit shall reset the audit due dates – the renewal period as defined in the Standards (e.g., 12 months from this subsequent audit date) and certificate expiry dates (e.g., 12 months + 42 days from new audit date).

1.15 SUSPENSION OR WITHDRAWAL (PERMANENTLY REVOKED) OF THE CERTIFICATION

The BRCGS certificate is owned by ACERTA, and it may be suspended or withdrawn at any time.

The certificate may be withdrawn by ACERTA due to:

- ✓ Evidence that the site no longer complies with the requirements of the Standard, raising significant doubt of the conformity of the products produced.
- ✓ Failure to implement adequate corrective action plans within appropriate timescales.
- ✓ Evidence of falsification of records.
- ✓ Failure of the client to comply with ACERTA contract terms and conditions e.g., non-payment of fees.
- ✓ Non-compliance to certification protocol e.g., improper use of BRCGS or certification body logos
- ✓ Pending complaint investigation
- ✓ There has been a major change to the site or its activities that require action e.g., site damage by flooding.
- ✓ Where a site visit raises doubt to the validity of the current certificate
- ✓ Pending appropriate corrective action following investigation into product recall and/or product withdrawal
- ✓ Failure to notify ACERTA of significant changes to the company e.g., senior management responsibilities.

The certificate may be withdrawn by ACERTA due to (for example)

- ✓ failure of the client to adequately comply with the ACERTA's request for action following a complaint investigation.
- ✓ following investigation or a scheduled audit, where a site is not maintaining the standards expected of a BRCGS certificated site.
- ✓ the company no longer trades
- ✓ the site no longer undertakes the scope activities e.g., cessation of manufacture due to extensive site damage by fire.
- ✓ A suspended site exceeds the 6-month time to demonstrate compliance for recertification.

In the event that certification is withdrawn or suspended by ACERTA, the company shall immediately inform its customers and make them fully aware of the circumstances relating to the cancellation or suspension. Likewise, information on the corrective actions to be taken in order to reinstate certification status will also be provided to customers.

ACERTA will formally write to the client informing them that their certificate has been suspended, the reasons for doing so and any action required from them including timescales in order to lift the suspension.

The Certification Body shall require the client to:

- ✓ withdraw any claims which indicate that the site is certificated.
- ✓ cease to advertise or use any certification mark issued by the Certification Body
- ✓ cease using the BRCGS logo within 48 hours of certificate suspension or as agreed with BRCGS

ACERTA shall update the status of the certificate on the BRCGS Directory

The BRCGS Directory system will generate an email to the nominated contact of the supplier and any selected customers to alert them to a suspended certificate.

The client will also be removed from the public listing of certificated suppliers on <https://directory.brcgs.com/>

I. DEFINITIONS:

SUSPENSION OF CERTIFICATION: “It is the deprivation, by the company, of the right to use the certificates, logo and trademark for a specific time period, due to any change or deviation detected in relation to the products, quality system or the own company. The producer will be prevented from using the logo/trademark, Licence/certificate or any other type of document that has any relation to BRCGS until the situation which has caused the suspension is solved within the time period set ACERTA (see table with the causes of suspension and cancellation of the certificate)”.

If the deviation has been caused by the own company, this shall demonstrate that the deviation has been solved, if possible, without a follow-up visit by ACERTA, and always within a reasonable time period.

CANCELLATION OF THE CERTIFICATION: “It is the complete cancellation or invalidation of a certificate granted to a company, due to different causes, being these motivated by the own producer or by other reasons beyond his/her control. Some causes of cancellation of the certification are shutdown of the company, change of activities, drastic changes to normative documents, company’s express desire, expiration of the certificate, etc.”

Besides what is described in this section, ACERTA shall suspend or cancel the certification in the following cases:

Table with the causes of suspension and cancellation of the certificate		
Cause of the suspension	Maximum period of suspension (*)	Cause of the cancellation
S1. The certification renewal inspection is delayed, in an unjustified way, more than 1 month from the previous inspection audit date.	3 months	C1. The cause of the suspension is not solved before the period of time allowed ends.
S2. The contracting party neglects to pay the economic agreements signed with ACERTA.	3 months	C2. The applicant does not comply, in a persistent way, with the economic agreements signed with ACERTA.
S3. Abusive misuse of trademarks. Non-fulfilment of what is established in the User guidelines for BRCGS Trademark and logo.	3 months	C3. Recurrent abusive use of BRCGS Trademark.
		C4. The company has intentionally provided ACERTA with false information.
		C5. A misuse of the certificate is verified. For example, it is linked, in case of product certificate, with a quality system or other products which are not certified.
S4. Non-fulfilment of obligations derived from the contract signed with ACERTA, or, acting, in any way, against ACERTA.	3 months	C6. Acting against ACERTA interests in a fraudulent way, recurrent non-fulfilment of the obligations derived from the contract signed with ACERTA, or when the cause of the suspension has not been solved before the period of time stipulated for that purpose.

(*) ACERTA reserves the right to establish shorter periods of time for solving the causes of suspension.

1.16 COMPLAINTS, APPEALS AND LITIGATIONS

For the purposes of this document, the following definitions are established:

COMPLAINT: An action taken by an applicant or certification holder, or by an interested third party, expressing in writing their disagreement with the way ACERTA has acted during the evaluation processes.

APPEAL: This is the action taken by an applicant or certification holder, by which he/she complains in writing against the decision taken by ACERTA in relation to the evaluation process that affects him/her. It may be due to discrepancies in the scope or because the certificate has been denied, suspended, or cancelled.

LITIGATION: This is the discussion established through judicial or extrajudicial channels between ACERTA and the applicants, certificate holders or former certificate holders, regarding a disagreement in the resolution of appeals, or for other causes that exceed the entity's capacity to resolve them.

Complaints: Any natural or legal person may lodge a complaint against ACERTA. Complaints may be communicated through formal channels; this is through the form available to the public on the ACERTA's website. If someone tries to make a complaint verbally or by a written means other than the above-mentioned, they will be asked to do so through the indicated channel so that the complaint is recorded, and the information is not misrepresented when it is transferred between people outside the entity.

This information is sent to ACERTA's General Management, who will designate the person who will contact the claimant to acknowledge receipt and clarify any doubts that may arise in this regard.

ACERTA will try to inform the interested party of the decisions taken within a maximum of 10 working days from receipt of the complaint.

Appeals: Any customer or applicant for certification may lodge an appeal against decisions taken by ACERTA.

All appeals must be managed using the form available to the public on ACERTA's website. Appeals will be finalised within 30 calendar days from the date of receipt. Once the detailed and thorough appeal investigation process has been completed, a final response will be communicated in writing.

Litigation: For the resolution of litigations that may arise from certification activity or any other disputes that relate to ACERTA with another party, the resolution of any discrepancies shall be governed by the provisions set forth in the certification agreement.

Note: Notification of changes to certification requirements is made through the ACERTA website: www.acerta-cert.com

APPENDIX I: WORDING OF SCOPE AND MANUFACTURING CATEGORIES**1. WORDING OF THE SCOPE**

It is important that the wording used to describe the scope of certification is clear and without any ambiguity.

The scope should include a general outline of the main process including any outsourced activity/subcontract processing, the material types, and the differentiation of characteristics such as intended use, e.g., food-contact. The site HARA plans shall reflect the products and processes that are within scope.

2. THE MAIN PROCESS

The main process and manufacturing techniques do not require detail of every step but should use one of two appropriate words to provide enough detail so that the typical product characteristics can be understood.

It is suggested using appropriate wording from the lists in the next table.

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

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

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

FOR EXAMPLE,

Draw-and-wall-iron (DWI) beverage can manufacture, process steps such as coil-feed, blank and drawn cup, re-drawn cup, wash and chemical treatment, varnish, cure, and so on are not required as all these steps are implicit in the DWI process. Similarly, with any print process: process steps such as ink application, curing, die-cutting, stacking, stretch-wrapping are not required.

Scope "manufacture of glass bottles"

Not acceptable. It is unclear what the process of 'manufacture' is, the nature of the glass and the intended use of the packaging material.

Scope "narrow-neck press and blow of flint glass bottles for use with soft drinks"

Acceptable as it is clear as to the process of manufacture, the material used, and the intended use of the packaging material.

3. MATERIAL TYPES

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

There should be a general outline of the material and the nature of the material being produced, it is suggested using appropriate words from the following (not an exhaustive list):

flint glass, amber glass, green glass, polyethylene terephthalate (PET), recycled polyethylene terephthalate (rPET), polyethylene glycol (PETG), polyvinylchloride (PVC), polypropylene (PP), polyethylene (PE), high-density polyethylene (HDPE), low-density polyethylene (LDPE), styrene-acrylonitrile (SAN), corrugated board, paper, paperboard, carton board, aluminum, steel, multi-layer laminate (stating materials used in the laminate), adhesives, post-consumer recycle (PCR), kraft (or virgin), test (or recycled),

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

4. ACTIVITIES AND PROCESSE THAT TAKE PLACE OFF_SITE

Some processes result in finished products that have a component manufactured by another site or company. Examples include tubs or buckets with in-mould labelling, where the label is supplied by another company and the audited site injects the tub or bucket to comprise a single item. Alternatively, handles manufactured by another company included into a corrugated case.

In these instances, the process carried out at the site of the audit is of interest and the auditor should be sampling those processes and how the site maintains control of product safety and quality. Indicative of the processes is the type of components that are received and included so the scope may include descriptors such as

‘Injection moulding of PE tubs with polymer in-mould labels’. If print activity is not in the scope (and print processes is not selected as a field of audit) then it is implicit those labels are not manufactured at the audited site.

Clause 3.9 SOI states - 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. The Standard also requires that these processes are traceable (3.9.5)

Sub-contracted activity is a process that is carried out at another site on behalf of the certificated site. In other words, the material goes off-site to be processed, stays off-site, and is dispatched to the customer. Examples include over capacity charges, final product labelling, packer filler, assembly packer.

Outsourced processing is a step in the process which is completed somewhere else. Where an intermediate production process or step in the manufacture of a product is carried out at another company or site and returns to the original site for completion e.g., hot foil stamping, printing etc.

Where all the process has been outsourced or part of the process is always subcontracted to an external or sister site, this shall be stated in the scope. A brief description is sufficient, for example, “Conversion of corrugated boxes (subcontracted print process) for food contact applications.”

Due to unforeseen circumstances where all the process has been outsourced or part of the process may have had to be subcontracted to an external or sister site (e.g., for reasons of business continuity in a disaster, pandemic), this shall not be stated in the scope. The site shall inform the auditor so that the relevant sections around management of subcontracted process can be explored in the audit.

5. GENERAL PRINCIPLES

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

Where a site manufactures a material (e.g., extrusion of film), and then prints it, the material must be listed first.

6. USE OF MANUFACTURING CATEGORIES

Manufacturing activity is to categorise the sites and to ensure that auditors selected to conduct the audit are sufficiently competent to understand the processes carried out at the site.

The chief concern of the fields of audit is the manufacturing activity taking place on site and the number of HARA plans used to mitigate risk to product safety, legality and quality. This means that the fields of audit used to select an auditor should relate to the main process and technologies.

The next table lists techniques and processes and the manufacturing category they relate to.

For assembly type processes, such as assembly of aerosol actuators, the fields of audit shall reflect the majority composition. Where the main material is less than 75% of the component, the next material categories shall also be used.

APPENDIX II: PRODUCT CATEGORIES

Cat Code	Manufacturing Category	Scope of manufacturing category and typical key processes
01	Glass manufacture and forming	<p>Key processes include:</p> <ul style="list-style-type: none"> • raw materials to finished product of glass containers from one furnace through independent section machines to cold end lacquer(s) • further processes for extra furnaces. Any print/decoration is an additional key process <p>Typical manufacturing techniques include:</p> <ul style="list-style-type: none"> • blow and blow • press and blow • extrusion of ampoules • forming and firing of ceramic bottles, jars or decanters
02	Paper-making and conversion	<p>Pulp to sheet or web, or conversion of sheet or web-fed paper where no printing operations take place (printing activities are additional key processes). Any print/ decoration is a further key process.</p> <p>Key processes include:</p> <ul style="list-style-type: none"> • manufacture of paper from raw materials (e.g. tree/pulp) to sheet or web (e.g. board, liner, cartonboard) • die-cutting, folding and gluing (erecting), and corrugating (from pulp) to corrugated sheet/reel • conversion of paper sheet into bags or sacks (including stitching) • manufacture of self-adhesive label stock (label and carrier/substrate) • die-cutting of sheet or web (including corrugated) to pads or fitments • moulding of pulp (of any source) into trays or fitments • manufacture of spirally wound tubes (including trimming and cutting)
03	Metal-forming	<p>Smelting of raw materials into aluminium, steel or tin, and conversion of those materials into packaging containers/materials. Any print/decoration is an additional key process.</p> <p>Key processes include:</p> <ul style="list-style-type: none"> • smelting with output to sheet or reel • rolling/pressing of aluminium foil • slitting or trimming of aluminium foil • pressing of foil trays or containers • impact extrusion • manufacture of three-piece can bodies • manufacture of two-piece can bodies (steel or aluminium) • manufacture of can-ends • stamping/punching of closures (compounds or wads are a raw material for metal closures and a second manufacturing category is not required)
04	Rigid plastics forming	<p>Forming of resin into rigid plastic packaging materials. Any print/decoration is an additional key process.</p> <p>Key processes include:</p> <ul style="list-style-type: none"> • injection moulding • in-mould labelling (additional key process if labels are not applied in other processes on site) • blow-moulding (extrusion/injection/press) • thermoforming

Cat Code	Manufacturing Category	Scope of manufacturing category and typical key processes
05	Flexible plastics manufacture	<p>Forming of resin into flexible plastic packaging materials, and laminating of multi-material layers into one layer. Any print/decoration is an additional key process.</p> <p>Key processes include:</p> <ul style="list-style-type: none"> • extrusion (cast/blown) (addition of shoulder for flexible tubes can be included as part of first key process) • laminating (of any material) • laminating and seaming of flexible tubes, addition of shoulder. • construction of plastic bags, pouches and sachets • vacuum metallising • blow-moulding • winding/rewinding films; slitting, scoring, perforating • coating (e.g. wax)
06	Other manufacturing	<p>This category will encapsulate the manufacture of those materials not able to be classified into other categories.</p> <p>Key processes include:</p> <ul style="list-style-type: none"> • construction of pallets, boxes and crates, decorative wooden boxes • processing of wood for food and cosmetic use, wooden utensils (e.g. for lollipops) • processing of natural cork, rubber • construction of hessian sacks, jute products, woven string (plastic or cotton) • processing of strings for tea bags or meatpacking
07	Print processes	<p>Any packaging material which is printed using any of the following print processes (each constitutes one key process) in addition to any manufacturing process:</p> <ul style="list-style-type: none"> • flexographic, lithographic, gravure, letterpress (and offset) • screen, tampo or digital print • decoration by hot or cold stamping/blocking <p>Any post-printing conversion, such as cutting/creasing and gluing of folded cartons, is considered part of the print process, as printed packaging materials are typically converted further once printed. Specify printing technologies used at the site.</p>
08	Chemical processes	<p>Essentially, the manufacture of raw materials used in the printing and conversion of other packaging materials. This includes the manufacture of:</p> <ul style="list-style-type: none"> • resins • adhesives • inks, varnishes and coatings

PRODUCT/STANDARD SELECTION

The options summarise the conditions under which an alternative Standard may be used with appropriate justification. The site/factory is certificated dependent on the main focus of sites current operations. The list provided is not exhaustive.

Note: Where a Standard other than the primary Standard is used it shall be recognised that the certificate may not be accredited dependent on the Certification Body and Accreditation Body and this should be checked with the Certification Body.

Product/Product Group	Primary Standard	Options
Cups and Lids		
Single use plastic/paper cups and lids	Either Packaging Materials or Consumer Products PCH*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector and/or where the factory is predominantly producing packaging materials (at least 70%). Global Standard Consumer Products is acceptable where the final product is purchased largely for domestic use by a consumer.
Re-useable plastic, glass, metal, ceramic cups	Consumer Products	General Merchandise Higher level. These items are washed before use.
Straws		
Single use plastic/paper drinking straws	Either Packaging Materials or Consumer Products PCH*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector and/or where the factory is predominantly producing packaging materials (at least 70%). Global Standard Consumer Products is acceptable where the final product is purchased largely for domestic use by a consumer.
Re-useable metal/plastic straws	Consumer Products	General Merchandise Higher level. These items are washed before use.
Napkins		
Single use Paper Napkins	Either Packaging Materials or Consumer Products PCH*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector and/or where the factory is predominantly producing packaging materials (at least 70%).
		Global Standard Consumer Products is acceptable where the final product is purchased largely for domestic use by a consumer.
Bags, Storage containers		
Single Use plastic, paper, metal foodbags, containers, and lids	Either Packaging Materials or Consumer Products PCH*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector and/or where the factory is predominantly producing packaging materials (at least 70%). Global Standard Consumer Products is acceptable where the final product is purchased largely for domestic use by a consumer.
Bin/trash bags	Either Packaging Materials or Consumer Products PCH*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector and/or where the factory is predominantly producing packaging materials (at least 70%). Global Standard Consumer Products is acceptable where the final product is purchased largely for domestic use by a consumer.
Re-useable plastic, ceramic, glass, metal containers and lids	Consumer Products	General Merchandise Higher level. These items are washed before use.
Plates		
Single use plastic/paper plates	Either Packaging Materials or Consumer Products PCH*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector and/or where the factory is predominantly producing packaging materials (at least 70%). Global Standard Consumer Products is acceptable where the final product is purchased largely for domestic use by a consumer.
Re-useable plastic, ceramic, metal plates	Consumer Products	General Merchandise Higher level. These items are washed before use.
Tablecloths/Tray Liners		
Paper/plastic Tablecloths/tray liners	Either Packaging Materials or Consumer Products*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector and/or where the factory is predominantly producing packaging materials (at least 70%). Global Standard Consumer Products is acceptable where the final product is purchased largely for domestic use by a consumer.
Textile tablecloths	Consumer Products	General Merchandise

Utensils, cutlery		
Single use Plastic/wooden/bamboo cutlery	Either Packaging Materials or Consumer Products*	Global Standard Packaging Materials is acceptable where the purpose of the final product is for use in the food service sector and/or where the factory is predominantly producing packaging materials (at least 70%). Global Standard Consumer products is acceptable where the final product is purchased largely for domestic use by a consumer.
Re-useable Plastic/wooden/bamboometal utensils, cutlery	Consumer Products	General Merchandise Higher level. These items are washed before use.
Personal Protective Equipment, PPE		
Grill gloves	Consumer Products	General Merchandise
Thermometers	Consumer Products	General Merchandise
Hand sanitisers	Consumer Products PCH*	
Single use Personal protective equipment gloves, hair coverings and face masks	Consumer Products PCH*	

* Global Standard Consumer Products (Issue 4, Personal Care and Household).

APPENDIX III RISK BASED DEVIATION

The following table shows a summary of the clauses that are new to current basic hygiene level sites with an indication as to which clauses can be deviated from based on risk. The rule for non-applicable clauses would also apply as with any site.

	<i>Clause New to Basic Hygiene</i>	<i>Description</i>	<i>Potential Non applicable clause?</i>	<i>Can be deviated. from on the basis of Risk?</i>
3 Product Safety and Quality Management– Internal audits	3.5.5	Documented hygiene inspections for packaging materials to be in contact with food or hygiene sensitive products.	y	y (frequency)
		Frequency of these hygiene inspections is risk based		
4.2 Site Standards- Building fabrics and Interiors	4.2.2	Suspended Ceilings	y	
	4.2.3	Internal drains protection		
	4.2.4	Windows and roof glazing -shall be protected from breakage		y
	4.2.5	Non-production glass breakage protection		y
	4.3	Utilities in production and storage areas, control of contamination		
4.3 Site Standards-Utilities	4.3.2	Water, air, other gases, monitoring		y
4.5 Site Standards- Layout, product flow and segregation	4.5	Layout, product flow, movement of personnel and segregation to prevent contamination and comply with legislation		
	4.5.3	Sorting and direct handling of product shall take place in areas with same standard of hygiene as production areas		
	4.5.5	At risk activities that could result in contamination conducted in a designated, segregated area		
	4.5.7	Movement of personnel through simple logical routes		
	4.6.3	Wooden equipment, clean and not a contamination risk.	y	y
4.6 Site Standards - Equipment	4.6.4	Notices on equipment, cleanable and secure		
4.7 Site Standards- Maintenance	4.7.1	Maintenance programme critical for safety, quality and legality		

	<i>Clause New to Basic Hygiene</i>	<i>Description</i>	<i>Potential Non applicable clause?</i>	<i>Can be deviated. from on the basis of Risk?</i>
4.8 Site Standards - Housekeeping and Cleaning	4.8.2	Documented cleaning procedures, methods, frequency, cleaning materials as appropriate		Y
	4.8.4	Toilet cleaning materials segregated from other cleaning materials		
	4.8.5	Microbiological environmental monitoring programme in place		Y
4.9 Site Standards – Product contamination control	4.9.1.2	Control of potential product contamination of glass, brittle plastics, ceramics and similar materials - breakage register		
	4.9.2.4	Open notice board - contamination control		Y
4.10 Site Standards – chemical and biological control	4.10.6	Trademarked materials, use third party specialist for disposal		
	4.10.7	External Storage of refuse in designated maintained areas		
4.11 Site Standards – Pest Management	4.11	Pest management programme, effective and well resourced		
	4.11.7	Catch analysis following infestation to identify problem areas		
5 Product and Process control – Product inspection, testing and measuring	5.6.6	In line testing equipment to identify and remove non-conforming product		
5 Product and Process control – Storage of all materials and intermediate and finished products	5.9.6	Documented procedures to segregate raw materials, intermediate and finished product to prevent contamination		
5 Product and Process control –	5.10.5	Documented hygiene and odour checking of all shipping containers and delivery vehicles		

	<i>Clause New to Basic Hygiene</i>	<i>Description</i>	<i>Potential Non applicable clause?</i>	<i>Can be deviated. from on the basis of Risk?</i>
6 Personnel – Personal hygiene: raw materials handling, preparation, processing, packing and storage areas	6.2.2	Handwashing at entry to production		Y
	6.2.4	Controlled use and storage of personal medicines		Y
	6.2.6	Cuts and grazes- apply appropriate covering		Y
Personnel – Staff Facilities	6.3.1	Locker rooms, no direct access to production		Y
	6.3.2	Lockers provided for personnel in production		Y
	6.3.3	Food stored in clean hygienic state, away from storage, processing production areas.		Y
	6.3.8	Protective clothing and personal clothing segregated within locker		Y
Personnel – Medical Screening	6.4	Health monitoring to prevent product contamination from staff, visitors and contractors		Y
Personnel – Protective Clothing	6.5.4	Protective clothing, appropriately designed, provides adequate coverage, frequently changed		Y
	6.5.5	Suitable footwear		Y
	6.5.6	Gloves, replaced regularly		Y
	6.5.7	Protective clothing kept clean		Y
	6.5.8	Home care laundry defined process		Y
	6.5.9	Clean and dirty clothing segregated		Y
	6.5.10	Disposable protective clothing, controlled		Y