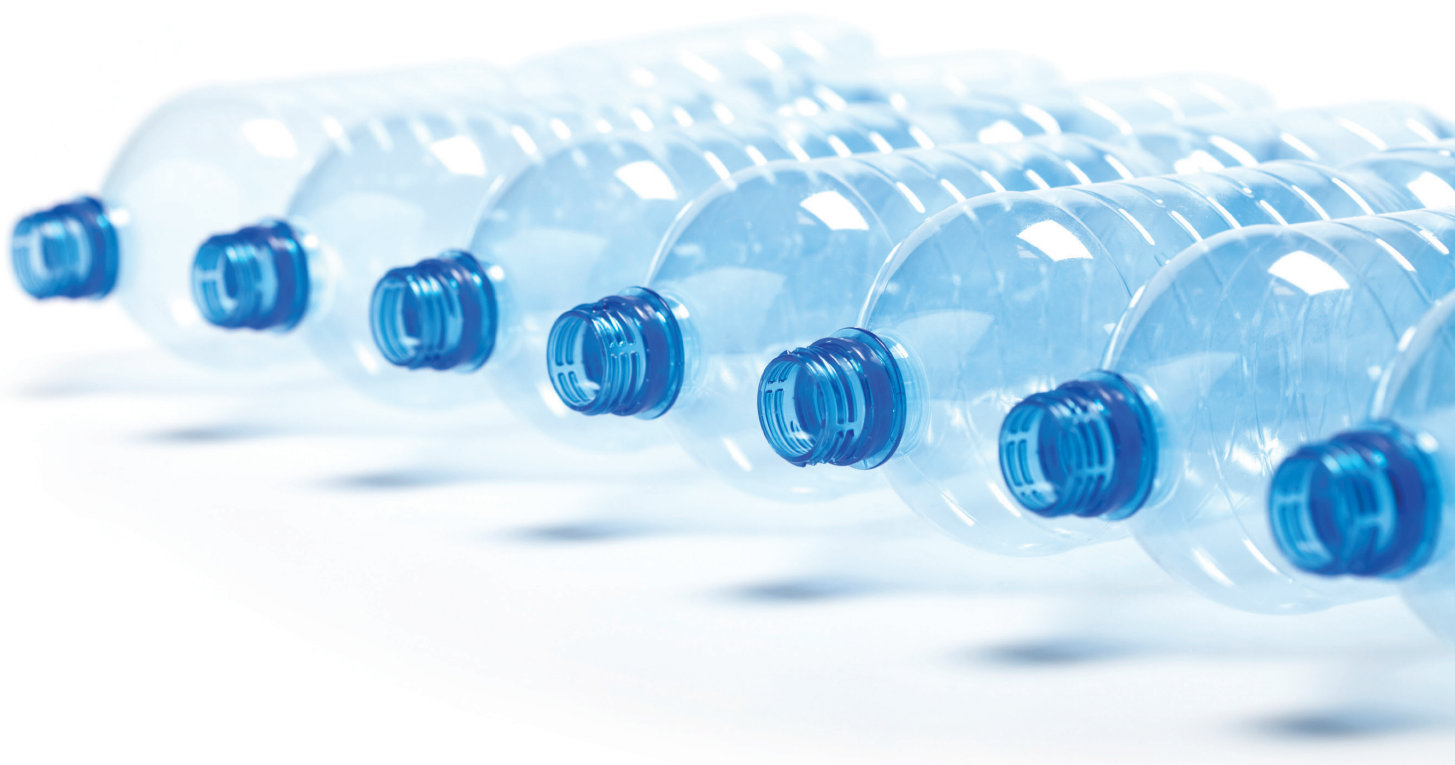




GLOBAL STANDARD
FOR PACKAGING & PACKAGING MATERIALS



**Guide to the Enrolment Program for
BRC Global Standard for Packaging and
Packaging Materials Issue 4**

Guide to the Enrolment Program for the BRC Global Standard for Packaging and Packaging Materials Issue 4

Contents

1.0 Introduction to enrolment	2
1.1 Eligibility	2
1.2 The benefits of enrolment	3
1.3 Costs of the enrolment program	3
2.0 The enrolment process	4
2.1 Starting the process	5
2.2 Review the requirements of the BRC Global Standard	5
2.3 Determine hygiene risk category	6
2.4 Registration into the enrolment program	7
2.4.1 Select a certification body for registration	7
2.4.2 Registration	7
2.5 Starting the enrolment program	7
2.6 Stages of the enrolment program	8
2.7 The stage visits	9
2.8 About the stage visit report	10
2.9 Stage visit duration	10
3.0 The stage visits	11
3.1 Planning the stage visits	11
3.2 The stage visit	12
3.3 Non-conformities	13
3.4 Stage visit report	14
3.5 The BRC Directory	14
3.6 What happens next?	14
Appendices	
Appendix 1 – Extract from the self-assessment checklist	15
Appendix 2 – Extract from the stage visit report	16

1.0 Introduction to enrolment

The BRC enrolment program for Packaging has been introduced to encourage the development of best practices in factories where product safety, hygiene and quality systems for packaging are still developing. The scheme incorporates the main features of the BRC Global Standard for Packaging and Packaging materials including:

- Registration in the secure log in section of the BRC Directory (listing in the public section of the directory is restricted to fully certificated sites)
- Interim reporting allowing you to understand the hygiene, safety and quality controls in place and areas identified for further development

The program is designed to help your site progress towards full certification over a period of time. As a complete audit is not carried out at each stage, your site must successfully complete a full certification audit to become certificated. This includes:

- Assessment of the site to the full requirements of the Global Standard for Packaging by a BRC qualified auditor or competent person at the end of the enrolment process
- A full audit by a BRC qualified auditor

1.1 Eligibility

The enrolment program is open to all packaging and packaging material manufacturing sites that are not currently certificated to the BRC/loP Global Standard for Packaging and Packaging Materials. This includes sites new to BRC certification and sites certificated to a previous Issue that have failed to meet the requirements for the new Issue at their first new Issue audit. If a site gains a significant number of major or minor non-conformities during a certification audit leading to an uncertificated result, the site may also enter the enrolment program.

P057 Issue 1	Guide to the Enrolment Program for the BRC Global Standard for Packaging and Packaging Materials Issue 4
Released 22/01/2014	Page 2 of 16

1.2 The benefits of enrolment

The program provides an introduction to the BRC Standard and certification processes, and has been specifically designed to encourage the development of best practice in terms of product safety, integrity and quality. Benefits of the enrolment program include:

- Access to a range of tips and tools from BRC to help in the development of quality and safety systems for packaging
- Gradual and staged implementation of the requirements driven by your own progress
- Assessment and verification from BRC approved competent personnel
- The tools to share progress throughout the enrolment program with your customers via the BRC Directory
- Access to self-assessment checklists to prepare for the certification audit

The visit reports are accessible from the secure log in area of the BRC Directory enabling you to share information with your customers. Once fully certificated to the Standard, your site will also be listed on the public BRC Directory.

Continual assessment also allows structured development of the quality and food safety management systems in the full knowledge of the final requirements for certification.

1.3 Costs of the enrolment program

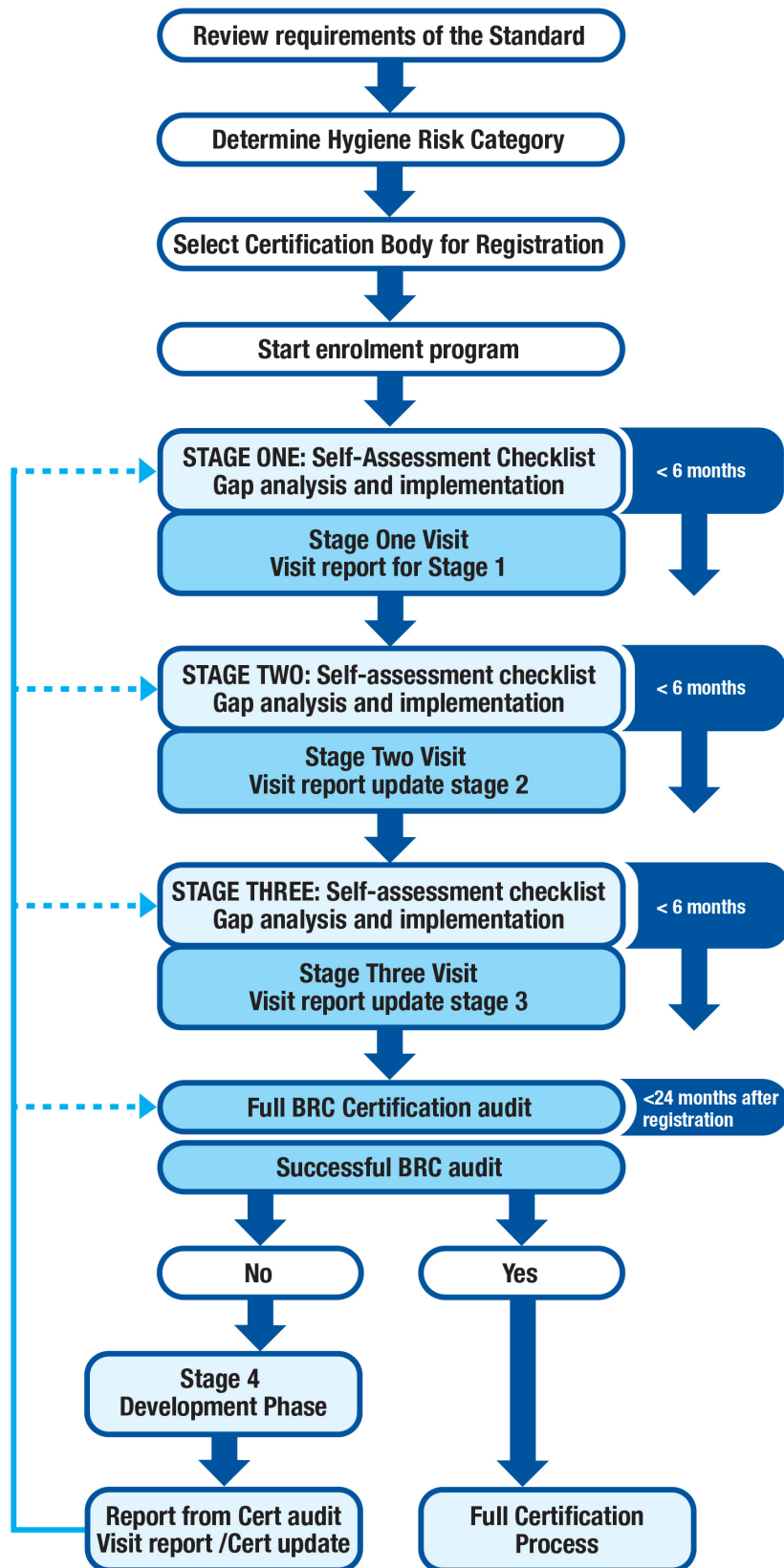
The only direct costs to your site are the standard BRC fee (currently £150) and the cost of a copy of the Standard and any additional publications.

The fee is paid to the certification body to register the site on the Directory and covers the entire first two years in the enrolment program and access to the support documentation. When your site undertakes a certification audit then a certification fee is payable.

P057 Issue 1	Guide to the Enrolment Program for the BRC Global Standard for Packaging and Packaging Materials Issue 4
Released 22/01/2014	Page 3 of 16

2.0 The enrolment process

The enrolment program is summarised using the following flow diagram (the references indicate the sections of this guide where further information can be obtained):



Each of the steps in the process flow diagram is explained in the sections below.

2.1 Starting the process

Purchasing a copy of the BRC Global Standard for Packaging and Packaging Materials is the first step in the process. It's available from www.brcbookshop.com and is required at the time of the certification audit.

It's recommended you also purchase a copy of the Packaging Standard Interpretation Guideline as this provides further detailed information and explanation of the requirements of the Standard.

2.2 Review the requirements of the BRC Global Standard

It's important that relevant staff (including senior management) understand the requirements of the Standard so that suitable systems and processes can start to be developed (if they don't already exist). This will require you to read the Standard and assess your site's current status against the requirements, and identify any areas that need to be improved. There are a number of options you can consider:

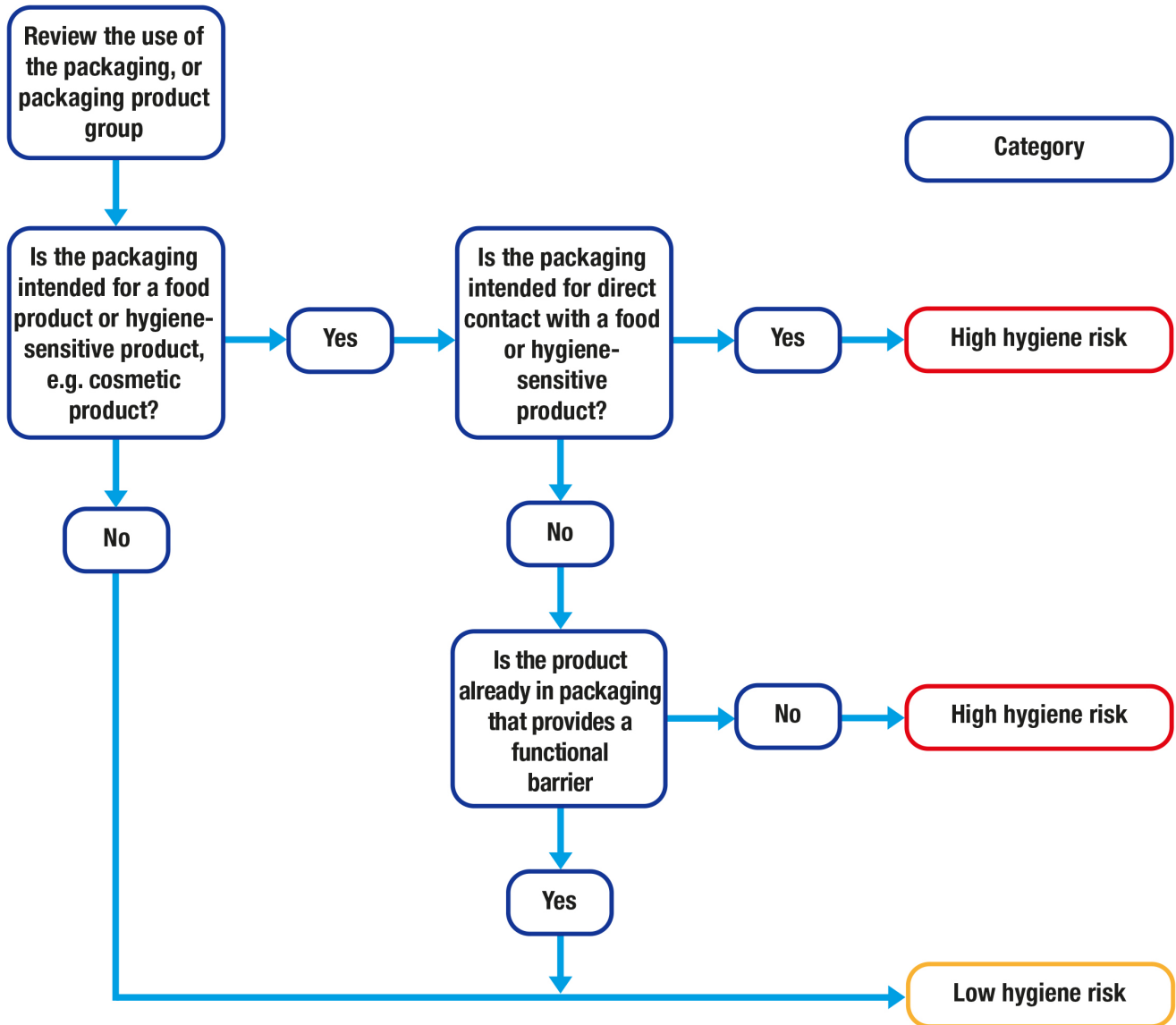
- In-house assessment based on your site's understanding of the Standard
- Training courses, for example, from the BRC and a worldwide network of approved training providers (ATPs). See www.brctrainingacademy.com
- Webinars on aspects of implementation of the requirements of the Standard
- A range of tools and useful information, such as self-assessment checklists, available to registered sites on the BRC website
- External consultancy services or training providers (although this is not a requirement of the process and is at the discretion of the site's management). It should be noted that even when using external expertise there are some areas where the site will need to demonstrate an appropriate level of knowledge (for example knowledge of hazard and risk management systems)

It's at this stage you may decide if the enrolment or audit program is most suitable for your organisation.

P057 Issue 1	Guide to the Enrolment Program for the BRC Global Standard for Packaging and Packaging Materials Issue 4
Released 22/01/2014	Page 5 of 16

2.3 Determine hygiene risk category

The requirements depend on the type of packaging produced. Typically, direct food contact materials are required to meet the requirements of the high hygiene risk category. And non-direct food contact materials are required to meet the requirements of the low hygiene risk category. However, the decision tree in fig. 2 determines the appropriate packaging hygiene risk category and should be used to decide which hygiene risk category is relevant.



2.4 Registration into the enrolment program

2.4.1 Select a certification body for registration

Your company will need to select a BRC approved certification body to work with. The BRC cannot advise on the selection of a specific certification body but a complete list is available from www.brcdirectory.com where you can search for certification bodies by country. Your registration, for enrolment with BRC, is carried out by the certification body. The certification body is also responsible for organising your audit, auditor and issuing the audit report and scorecard.

The scope of the audit, i.e. the products and processes included in the enrolment program (and therefore included in the certification audit), need to be defined before the audit and agreed with the certification body. It's generally expected that all products and processes are included in the scope and any exclusions only permitted by exception. This is because it's difficult to manage a factory where only a proportion of production is carried out to the requirements of the Standard.

2.4.2 Registration

Sites can enter the enrolment program directly, or after the initial audit if certification appears unlikely.

Registration enables your site to access information and tools provided by the BRC which are available (to registered companies) on the enrolment area of the BRC website www.brcglobalstandards.com. The first stage visit of the site will usually take place within six months of registration and then within six-month periods subsequently.

2.5 Starting the enrolment program

The enrolment program for the Packaging Standard is designed to be a staged integration of the requirements of the Standard into your company's organisational culture over - typically - an 18-month period, with an initial full audit taking place within two years of registration.

It's recommended that your site carries out a review of your current programs against the enrolment program checklists. The whole scope of the Standard may be assessed at each stage as issues could, for example, include items relating to the structure of buildings, equipment requirements, the design of processes or the documentation and implementation of procedures.

The checklists should be undertaken in-house, for example, by a BRC team leader, and a team where appropriate. In some cases you may prefer to use external expertise such as a consultant, or have a pre-audit visit from your chosen certification body. However, these visits are not compulsory and are at the discretion of the site management.

Most certification bodies are able to provide the stage visits. But in order to maintain their impartiality the auditors are not permitted to provide consultancy services. If your site wants to consider this option you should discuss it directly with your certification body or preferred consultancy.

P057 Issue 1	Guide to the Enrolment Program for the BRC Global Standard for Packaging and Packaging Materials Issue 4
Released 22/01/2014	Page 7 of 16

After registration with a certification body, your site will gain access to the relevant stage self-assessment checklists so you can perform a gap analysis. A gap analysis will establish your current status, and identify where changes are needed to demonstrate compliance with the Standard.

During the visit, the auditor will assess and validate the measures taken to implement the requirements of the Standard, and verify that operating conditions are sufficient to demonstrate compliance at a certification audit. Each stage visit may be combined with any subsequent stage audits.

When setting the date for any stage visits, you'll need to think about the appropriate personnel that need to be available.

2.6 Stages of the enrolment program

This model for enrolment closely follows the GFSI emerging markets program as set out in the GFSI *Global Markets Capacity Building Program* for Food safety management systems.

Stage 1

1.1	Product safety and quality management policy	4.1	External standards
1.2	Senior management commitment	4.2	Building fabric and interiors
2.1	Hazard and risk management team	4.3	Utilities
2.2	Hazard and risk analysis	4.9	Housekeeping and cleaning
3.2	Customer focus and contract review	4.11	Pest control
3.7	Specifications	5.7	Control of non-conforming product
3.9	Traceability	5.8	Foreign body contamination control
3.11	Management of incidents, product withdrawals and recalls	6.3	Personal hygiene

Stage 2

1.3	Organisational structure, responsibilities and management authority	4.8	Staff facilities
3.1	Product safety and quality manual	4.10	Waste and waste disposal
3.4	Supplier approval and performance monitoring	4.12	Transport, storage and distribution
3.6	Document control	5.4	Product inspection and analysis
3.10	Complaint handling	5.5	In-line testing and measuring equipment
4.4	Security	5.6	Calibration
4.7	Maintenance	6.1	Training and competence

Stage 3

1.4	Management review	5.1	Product design and development
2.3	Exemption of requirements based on risk analysis	5.2	Packaging print control
3.3	Internal audits	5.3	Process control
3.5	Supplier approval and performance monitoring	6.2	Access and movement of personnel
3.8	Record keeping	6.4	Medical screening (not for low hygiene risk category)
4.5	Layout and product flow	6.5	Protective clothing (6.4 for low hygiene risk category)
4.6	Equipment		

An extract of a typical stage self-assessment checklist is shown in Appendix One

Stage four

Stage four is applicable if your company has undertaken a certification audit but the auditor has found a significant number of non-conformities at the time of the audit, and a technical review of the audit report indicates that certification is unlikely. Your site will receive a full and complete BRC audit report from your certification body recording conformity and non-conformity, and this will also be uploaded to the BRC Directory. But your site's details will not appear on the public directory.

Stage four is also applicable if your site hasn't entered the enrolment program for Packaging, but the number and types of non-conformity raised at the initial audit may indicate that certification is unlikely.

It's recommended your site focuses on areas of non-conformity, whilst maintaining areas of conformity adequately. At subsequent audits a new initial certification audit will take place and it's essential that good practices already in place remain effective and operational.

Your company can remain in stage four for up to one year (based on the initial certification audit date) before you'll be required to undertake a new initial certification audit. After this time, your site would be removed from the enrolment program, but may re-enter at any time. Your site may undertake a new initial audit at any time, but it's recommended you take at least one month to give your site adequate time to implement corrective actions and ensure their efficacy.

2.7 Stage visits

The purpose of the visit is for an auditor to examine the measures that your site has taken in order to demonstrate compliance with the requirements of the Standard; to verify and validate if those measures are sufficient in demonstrating compliance; and to identify any further measures your site may need to make in order to fully comply with the requirements of the clause.

The outcome of the visit will be a visit report, which you can use to develop a corrective action plan for making improvements to your systems or operating conditions. There is no time limit for the non-conformities to be closed. But the previous report should be viewed and corrective actions examined at the next stage visit to ensure that corrective actions are sufficient, and at the certification audit to ensure your site is in compliance with the requirements of the Standard.

P057 Issue 1	Guide to the Enrolment Program for the BRC Global Standard for Packaging and Packaging Materials Issue 4
Released 22/01/2014	Page 9 of 16

2.8 About the stage visit report

The stage visit report is not the same as the certification audit report. It looks different to prevent confusion, and includes a summary where the section findings can be recorded. This report will be uploaded to the Directory but the data will not be shown on the public Directory. The report is uploaded so you can access it as soon as it's available and share it with your customers. The status of the stage visit reports means that if your site has not yet successfully completed a certification audit it will not appear on the public BRC Directory listings.

Stage visit reports are formatted to include all requirements of the clauses per stage, and a listing of any non-conformities found during the visit. See section 4.3 for a summary of how non-conformities are identified and categorised.

Each stage report specifies the latest date for the next stage visit, or in the case of a stage three visit, the certification audit due date. At the latest, the next audit should be scheduled within this timeframe.

Non-Conformity Summary			
No.	Req. ref	Level	Details of non-conformity

2.9 Stage visit duration

The typical duration of the validation and verification stage visit is up to one day, and the auditor thoroughly examines the procedures and processes implemented by your site.

Your site may choose to work with all stages of the enrolment program at the same time if you feel that your existing programs are sufficient to demonstrate compliance with the BRC Standard. This may especially be the case where the site has already gained certification to other certification schemes such as ISO. The steps, phases and timelines are to be used as guidelines only, and are not mandatory. Your site can take as much or as little time as needed within the two-year limit, and combine steps, or otherwise alter your progress as your situation dictates.

3.0 The stage visits

3.1 Planning the stage visits

The first stage visit will typically take place within six months of initial registration with the BRC. This is to ensure that your organisation's initial drive to enrol in the program and obtain certification is capitalised on.

The BRC does not undertake stage visits. The visit is carried out by a fully trained and BRC registered auditor working for or on behalf of a BRC approved certification body. The auditor will be experienced in the category of packaging material produced at your site, as defined in the audit scope.

The length of the visit is typically one day but may be based on a number of factors such as the size of the site, the number of products manufactured and the activities taking place. The same auditor may visit the site on subsequent stage visits (and for the certification audit), as no consultation will be offered throughout the process by the auditor or certification body contracted for the stage visits and/or certification audit.

The stage visits are undertaken at dates agreed between the certification body and the site (all audits in the Packaging scheme are announced). When setting the dates you need to think about:

- Products included within the scope being manufactured (consider seasonal products or those which are manufactured infrequently)
- The availability of appropriate personnel
- The fact the date will form the basis for following annual audits

Prior to the audit, the certification body may request copies of certain documents/information to ensure the auditor is fully prepared and able to audit the site efficiently. Typical documentation may include:

- A summary of any critical control points (CCPs)
- The process flow diagram
- A simple site plan
- A management organisational chart
- A list of products included within the scope
- Typical shift patterns
- Production schedules
- Details of any recent issues

P057 Issue 1	Guide to the Enrolment Program for the BRC Global Standard for Packaging and Packaging Materials Issue 4
Released 22/01/2014	Page 11 of 16

3.2 The day of the stage visits

Unlike the certification audit, the exact sequence and types of activities will vary depending on the stage, and the size and type of your site. However, it's advisable to start with an opening meeting, which all relevant company personnel need to attend. This will outline and agree the plan for the visit, such as the order in which the activities take place, the specific personnel required and when documents and activities will be reviewed.

During the course of the visit, the auditor may:

- Walk the perimeter of the site and the production flow
- See the manufacturing processes in operation around the site
- Speak to personnel in the factory about their job function and ask them to demonstrate certain activities
- Check and discuss the basis of the operation of the company's procedures
- Ask to see documented company policies, records and documentation on specific topics and assess whether they meet requirements
- Choose a specific product and manufacture date to conduct a traceability exercise (stage visit one) that the auditor can review – this will mean the site has to gather all the relevant production records for this product/ date

Much like an audit, the auditor will make notes during the visit as to how your site meets the requirements of the Standard for inclusion in the audit report, as well as areas where further improvement is needed.

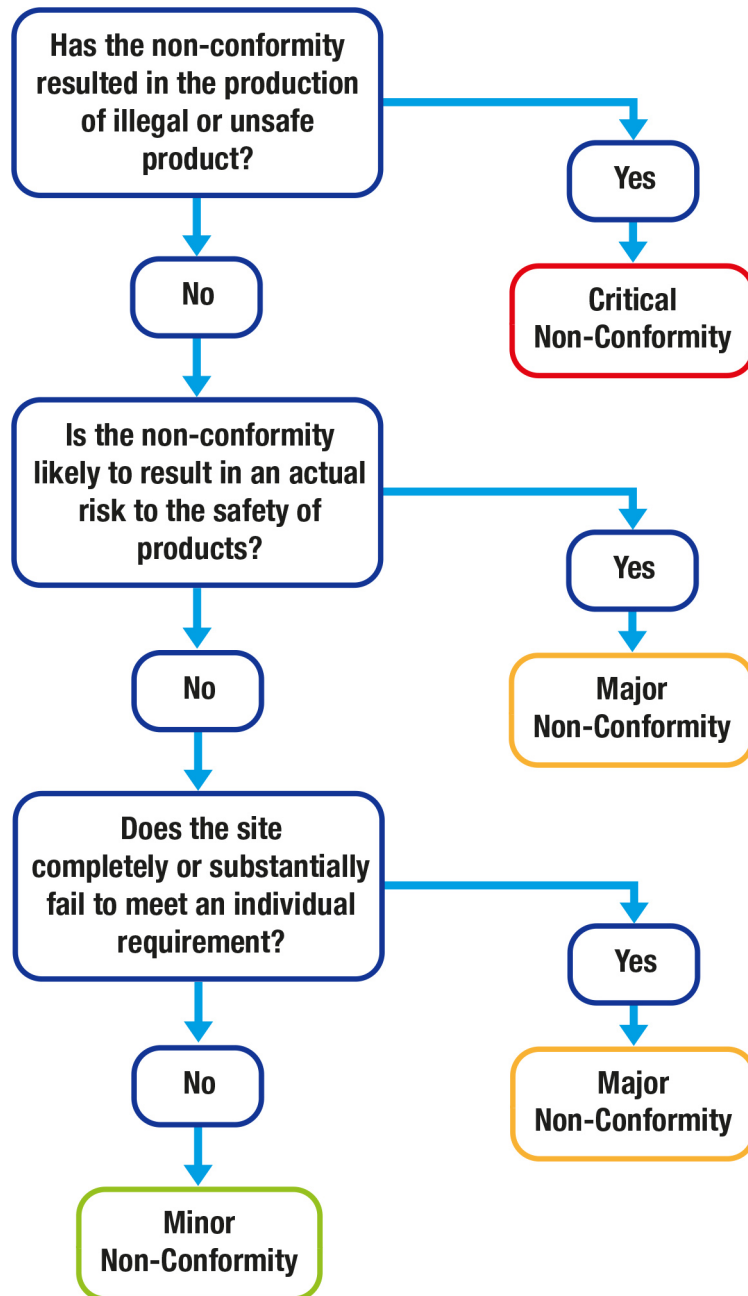
Towards the end of the visit, once all the major activities are completed, the auditor will require some time to write up the evidence and collate details of the non-conformities. The auditor may hold a more formal closing meeting or simply discuss the non-conformities found and give you a short written summary with the full visit report to follow.

P057 Issue 1	Guide to the Enrolment Program for the BRC Global Standard for Packaging and Packaging Materials Issue 4
Released 22/01/2014	Page 12 of 16

3.3 Non-conformities

During the course of the stage visits it's likely that the auditor will identify items that represent non-fulfilment of specific requirements of the Standard. Once the stage visit has been completed, the auditor will categorise these non-conformities as critical, major or minor. (The diagram below gives an indication of the decision-making process the auditor will use, and full definitions are given in the glossary). The auditor will describe each non-conformity in detail.

Decision Tree to determine non-conformity grading:



It should be noted that a critical non-conformity represents a failure to produce a product that is safe and/or legal. Only once the critical non-conformity has been corrected and confirmed can your site progress to the next stage visit and certification audit to receive a BRC certificate.

The certification body will usually provide a non-conformity summary in the same format as the audit report. Your site will need to add the corrective action and timescales for each non-conformity within the timescales set out in the Standard.

If your site submits a corrective action that, in the opinion of the certification body cannot, even if fully implemented, appropriately address the non-conformity, then the certification body will tell you and ensure you thoroughly understand the nature of the non-conformity.

It's the responsibility of your site to manage the non-conformities and the corrective actions. The certification body will not require proof that the actions have been completed or that the non-conformities have been satisfactorily addressed, although this will be reviewed at the next stage visit.

3.4 Stage visit report

The stage visits audit report contains all the information about your site, listings of any non-conformities, and a clause by clause summary of the actual operating conditions of the site. A narrative description that states how the site demonstrates compliance with each requirement is required.

3.5 The BRC Directory

Once your site has begun the enrolment program, the record and stage visit reports will be available in the secure log in area of the BRC Directory. You will be able to review this information and make it available to your customers. At this stage, your company information isn't available on the public listing of the BRC Directory as this lists fully certificated sites only.

3.6 What happens next?

If your site is in the enrolment program you're expected to address the issues raised during each visit and continue to improve your systems.

However, if your site considers itself ready to implement aspects of the enrolment program and to proceed to certification there's no obligation to wait as an audit can be arranged at any time.

The full certification audit of the site should take place within 24 months of registration with BRC.

P057 Issue 1	Guide to the Enrolment Program for the BRC Global Standard for Packaging and Packaging Materials Issue 4
Released 22/01/2014	Page 14 of 16

Appendix 1 – Extract from the self-assessment checklist

BRC Global Standard for Packaging Self-Assessment Tool – Stage One.



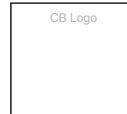
Stage One

Section One – Senior Management Commitment and Continual Improvement		
1.1	Product safety and quality management policy	Details
Statement of Intent		
The company's senior management shall develop and document a product safety and quality policy, which is authorised, reviewed, signed and dated by an appropriate senior manager.		
1.1.1	The policy shall state the company's intention to meet its obligation to produce safe and legally compliant products to the specified quality, and its responsibility to its customers. This shall include a commitment to a process of continuous improvement.	
1.1.2	The company's senior management shall ensure the policy is communicated to all staff involved with activities relating to product safety, legality, regulatory compliance and quality.	
1.2	Senior management commitment	Details
FUNDAMENTAL		
Statement of Intent		
The company's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging & Packaging Materials. This shall include provision of adequate resources, effective communication and systems of management review to effect continual improvement. Opportunities for improvement shall be identified, implemented and fully documented.		
1.2.1	The company's senior management shall ensure that product safety and quality objectives are measurable, established, documented, monitored and reviewed.	
1.2.2	The company's senior management shall provide the human and financial resources required to implement the processes of the quality management system and product safety programme.	
1.2.3	Clear communication and reporting channels shall be in place to report on and monitor compliance with the Standard.	
1.2.4	The company's senior management shall have a system in place to ensure that the company is kept informed of all relevant legislative requirements in the country of manufacture and, where known, the country in which the packaging material will be sold. The company shall also be aware of any scientific and technical developments and industry codes of practice applicable.	
1.2.5	The company shall ensure that the materials manufactured comply with the relevant legislation (including any legislation concerning the use of	

P057 Issue 1	Guide to the Enrolment Program for the BRC Global Standard for Packaging and Packaging Materials Issue 4
Released 22/01/2014	Page 15 of 16

Appendix 2 - Extract from the stage visit report

The stage visit reports contains all of the requirements and an opportunity for the auditor to highlight conformity and non-conformity against each clause, along with a narrative summary of the actual operating practices of your site, where necessary.



Enrolment : Stage Visits Report

Global Standard for Packaging and Packaging Materials Issue 4 : February 2011

1. Audit Summary			
Company Name:		Site name:	
Audit Category:	High Hygiene Risk	BRC Site Code:	BRC Site code

2. Results			
Audit Result:	...	Audit Grade:	Select
		Audit Frequency :	Frequency months

3. Audit Detail			
Audit Start Date:	Select a date	Audit Finish Date:	Select a date
Re-audit Due Date:	Select a date	Previous Audit Date:	Select a date
Auditor Number (one only : team leader)	Auditor Names		
Auditor Number			

4. Scope Details	
Packaging Field:	
Select a packaging field	
Select a packaging field	
Select a packaging field	
Select a packaging field	
Scope of Audit:	Scope of Audit
Exclusions from Scope:	
Non-applicable clauses:	
Products in production at the time of the audit:	
Products in production at the time of the audit	

5. Company Profile
Company Profile

CB name and address	Enrolment Program for Packaging: High Hygiene Risk – Stage Report	
P059 Issue 1: DRAFT	Page 1 of 36	Global Standard for Packaging and Packaging Materials – Issue 4



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