

Hygiene Management

Guidance for Suppliers of Corrugated Packaging to the Food Industry

Introduction

Food Safety is a high profile issue whose importance cannot be understated. A significant proportion of the corrugated packaging manufactured is supplied to the food industry. Food manufacturers and processors require an assurance that all the packaging they use is safe and fit for purpose. In particular UK legislation provides a defence of due diligence where manufacturers may demonstrate that they have taken all reasonable steps to ensure the safety of supplies. The route now accepted for achieving this is through the introduction of formal hygiene management systems, normally assessed by third parties. The purpose of this bulletin is to provide current information on the systems currently in use for corrugated packaging in the UK.

Background

In 1992 the British Fibreboard Packaging Association (BFPA), now the Corrugated Sector of the Confederation of Paper Industries (CPI) published its Technical Bulletin No. 1, Guidelines for "Hygiene Standards for Fibreboard Packaging Manufacturers Supplying the Food Industry". These guidelines contain all the basic provisions for maintaining good hygiene practices and are essentially the same as those applying today. However the Bulletin was advisory in style, making it unsuitable for the conduct of a formal audit and, because it has been superseded by other texts, it has now been withdrawn.

Following the development of formal hygiene management systems such as those published by Pira International, RSH (Royal Society of Health) and ADAS, the BFPA published in January 1995 a further set of guidelines (Technical Bulletin No.8) specifically related to introducing a hygiene management system for fibreboard manufacturing operations. These guidelines made specific reference to the technique of HACCP (Hazard Analysis and Critical Control Point).

Because views relating to the use of this technique have changed and with the development of a new unified standard for the UK, Technical Bulletin No.8 has been withdrawn in its original format. It is now published as this new text explaining the developments over the past decade and referring to the current standards.

Development of the BRC/IOP Standard

As explained in the previous section, in recent years a number of organisations were able to provide packaging manufacturers with third party certification for hygiene management systems against a variety of standards or codes of practice. UK retailers expressed some concern over the possibility that a multiplicity of schemes could result in an excessive variation in the hygiene standards actually achieved with the consequent potential to create a loss of confidence in the system of "due diligence". In December 1999 a meeting was convened jointly by the British Retail Consortium (BRC) and the Institute of Packaging (IOP) to discuss the preparation of a new standard. The various existing standards and guidelines were tabled at this meeting including the Technical Bulletin No.8. Working Groups were formed with representatives of major retailers, packer/fillers, packaging manufacturers, raw material suppliers and the certification bodies. These groups worked on the new Standard itself and an Evaluation Protocol. The Corrugated Sector was fully involved in all the discussions.

The outcome of the work was the publication in October 2001 of a document entitled "Technical Standard and Protocol for Companies Manufacturing and Supplying Food Packaging Materials for Retailer Branded Products". This document quickly established itself as the unified standard for the assessment of packaging hygiene management systems. A second edition with significant changes to the Protocol but only very minor changes to the Standard itself was published in August 2004. The title of this edition

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(Issue No.2) is:

BRC/IOP Global Standard
Food Packaging and Other Packaging Materials

Several key features should be noted:

- 1) An important feature of the standard is that it is designed to enable evaluation of packaging manufacturers by third party certification bodies accredited to the European Standard EN 45011 (General requirements for bodies operating product certification systems).
- 2) Section 3 of the Standard specifies that a Hazard and Risk Management system shall be in place. The treatment of hazards and risks is in line with current thinking concerning the use of HACCP, which is seen as being applicable to process steps where careful control of process parameters is essential for food safety. Such steps are not normally present in the manufacture of packaging. The hazard analysis required is to identify controls which would be needed relating to specific processes. These would be in addition to the "prerequisites" of the standard, which are the requirements contained in Sections 4-7 of the Standard. Section 3 also gives a procedure for "exemptions" to the prerequisites.
- 3) The standard covers quality aspects as well as aspects relating specifically to hygiene management. Although most producers will already have these quality management aspects certified through ISO 9001, an advantage of having them covered by one document is that this may provide a useful means of demonstrating conformance with the GMP (Good Manufacturing Practice) requirements of the European Union regulations for materials for food contact.
- 4) A review body (the BRC/IOP Technical Advisory Committee) has been established which will discuss any proposals for modifications to the standards and will also keep under review the process of third party certification. The review body currently has three representatives from packaging manufacturers including one from the corrugated sector who also covers the interests of the wider paper and board sector.

Experience of those in the corrugated board manufacturing sector who converted to certification based on the new standard was that no significant problems have been encountered with its introduction.

Development of a FEFCO Standard

The stated intention of the BRC and IOP was to extend acceptance of their document as the single standard for packaging manufacture for the whole of Europe. Although translation into a number of other European languages has taken place, uptake of the standard outside the UK has been rather patchy. During the later months of 2001 the European corrugated board industry, through its confederation FEFCO, identified that with the publication of the BRC/IOP Standard there was actually the potential for a multiplicity of standards relating to corrugated board. This was because of the publication of standards specific to corrugated board manufacture in France and the Netherlands. FEFCO therefore proposed the production of a European-wide standard specific to corrugated board. The UK Corrugated Sector, participated in the development of the FEFCO Standard on the basis that it was to be totally compatible with the BRC/IOP Standard.

The title of the FEFCO Standard is "Standard for Good Manufacturing Practice for Corrugated Board". Good Manufacturing Practice (GMP) can be defined as "the combination of manufacturing and quality control procedures aimed at ensuring that products are consistently manufactured to their specifications". This means that the standard is the equivalent of the BRC/IOP Standard in covering both quality and hygiene requirements and also provides the GMP to fulfil the requirements of the European Union regulations for materials for food contact.

Development of a CEN Standard

In February 2004 the Technical Committee for Packaging in CEN (European Committee for Standardization) took the decision to produce a European Standard with the title "Management of hygiene in the production of packaging for foodstuffs". The intention of this development is also to reduce the proliferation of standards covering the manufacturing of packaging for food and indeed the Chairman of the Technical Committee stated that the aim was have only two standards being used, the BRC/IOP Standard and the CEN Standard. The work on the standard is in

progress and the anticipated date for completion is early in 2008.

Source of Documents

The BRC/IOP Standard

"BRC/IOP Global Standard; Food Packaging and Other Packaging Materials", published by The Stationery Office and available from:

The Stationery Office

PO Box 29, Norwich, NR3 1GN

Tel; 0870 600 5522

Fax; 0870 600 5533

Websites; www.clicktso.com;

www.thestationeryoffice.com.

A useful source of information on the topic is:

"Good Hygiene Practice. A handbook for managers", published by ADAS and available from:

ADAS

Wergs Road, Wolverhampton, WV6 8TQ

Tel; 01902 754190

Website; www.adas.co.uk.