



## GENERAL REGULATIONS FOR THE CERTIFICATION SCHEME “BRC IOP GLOBAL STANDARD – FOOD PACKAGING AND OTHER PACKAGING MATERIALS”

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## 1 SCOPE

This document constitutes the "general regulations" that set out the procedures that DNV applies in order to issue, maintain, and withdraw the certificate of conformity according to the "BRC/IOP Global Standard – Food packaging and other Packaging Materials" (BRC IOP - packaging) scheme for companies in the packaging sector (see Field of Application). This document is fully included in the certification agreement.

### 1.1 Authorization to perform BRC audits

The BRC-IOP Global Standard Food Packaging is the property of BRC (British Retail Consortium).

The certification according to BRC standards is only permitted after approval of the certification organisation by BRC and the appropriate contract with the same.

### 1.2 Field of application

The BRC IOP – packaging certification scheme applies to packaging products. It also applies to disposable products that come into contact with foods, such as plastic plates and cutlery.

The main area of application is "converting", but it can also be applied to previous activities and, if necessary, also to packaging destined for use other than for food.

## 2 POLICY

DNV provides the service of product certification according to the requirements of EN 45011 (ISO Guide 65), adopting non-discriminatory procedures, that is:

- ❖ All the organisations whose activities fall within the standard's field of application can access the certification service provided their commitment to abide by general regulation and the standard itself
- ❖ Undue financial and/or other conditions are not applied
- ❖ Access will not be conditional upon the size of the organisation or membership of any association or group
- ❖ Access will not be conditional upon the number of certificates already issued

The correct application of conditions and procedures is verified by the Certification Committee which includes all the parts interested to the certification activities without any predominance of single interest.

DNV policies, organisation and procedures distinguish between product certification and any other activities in which DNV is engaged. Specifically, DNV does not provide consultancy services for the implementation of food safety systems.

### 2.1 General Conditions

To get and maintain the certification, the organization shall:

- a – abide by the local general legislation concerning food safety

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- b - abide by requirement of this general regulation
- c – abide by requirement to use certificate and certification mark
- d – regularly pay off the invoices issued according the signed contract

### 3 DOCUMENTS OF REFERENCE

#### 3.1 BRC requirements

The requirements to satisfy in order to obtain the certificate of conformity with the BRC-packaging technical standard are specified in the “BRC/IOP Global Standard – Food packaging and other Packaging Materials” protocol (current version at the time of application for certification). At the date of issue of these regulations the September 2004 version is in force.

The BRC “Position statements” published by BRC on the website [www.brc.org.uk](http://www.brc.org.uk) ([http://www.brc.org.uk/standards/interpretation\\_positionstatements.htm](http://www.brc.org.uk/standards/interpretation_positionstatements.htm)) shall be considered too.

DNV shall ensure the applicant company has the correct version of the relevant Standard, or confirmation of a downloaded Standard issued by BRC against which they are being evaluated. Under no circumstances shall any copies of the BRC Standards be made without the permission of BRC.

#### 3.2 References of the certification scheme

The following documents have been considered by DNV within the application of this scheme:

- ♦ “BRC/IOP Global Standard – Food packaging and other Packaging Materials”, The Evaluation Protocol, September 2004.
- ♦ BRC – DNV Framework agreement relating to the provision of evaluation services
- ♦ [Requirements for organisations offering certification against criteria of the British Retail Consortium Global Standards – BRC, 17<sup>th</sup> July 2006](#)

### 4 SPECIAL REGULATIONS

The scheme includes 2 product categories, classified on the basis of the “criticality” defined according to the following elements:

- End use of the packaging material related to the type of food product.
- Conditions in which the packaging material is used.
- Intrinsic risk of contamination of end product.

The standard includes (page 10) a “decision tree” to use along with a risks analysis to classify packaging.

The risks analysis conducted to classify the product must be documented, and may also provide for the exclusion of some points of the protocol.

This exclusion is subject to DNV approval (and is recorded in the evaluation report), and shall be subject to periodic documented review by the company.

#### 4.1 Prices

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DNV drafts and sends every company applying for certification a specific offer, complete with all information relating to the technical aspects and costs, based on the following aspects: presence of absence of a Certified Quality System, number of products affected by certification, size of production units; number and geographic site of the production unit/s; complexity and criticality of the production processes.

DNV shall collect, on behalf of BRC, the Administration Fee established by BRC itself for the "BRC Global Standard Directory" management. DNV "shall not issue a certificate or report until the Administration Fee has been collected from the supplier irrespective of the outcome of the certification process".

At the date of issue of these regulations, the BRC Administration Fee is 75 £ (U.K. Pounds Sterling)

#### 4.2 Conditions for BRC-packaging conformity

The certifying company signs the commitment to comply with the BRC - packaging standards and to satisfy the requirements therein.

The standard requires:

- The adoption of a Formal Risks Analysis System;
- A Technical Management System;
- The control of the of factory standards, products, processes and personnel.

Every section begins with a "statement of intent" that must be satisfied. Specific requirements are then detailed for each statement. In sections 5-6-7 some requirements are applicable only to Category B products (high risk).

#### 4.3 Management of incidents / legal actions

If the certified company becomes aware of legal actions relating to product safety, it must inform DNV of this within 3 calendar days and provide all information relating to the event, so that DNV can assess the situation and the implications for the certification.

If there is likelihood that the legal proceedings will lead to adverse publicity or Government intervention, DNV will immediately inform BRC of the incident.

#### 4.4 Nonconformities

The assessment must verify the nature and significance of every NC.

##### 4.4.1 Definition of NC

3 levels of Nonconformity are defined

##### 4.4.1.1 Critical NC

There is a failure to comply with a product safety or legal issue.

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#### 4.4.1.2 Major NC

Substantial failure to meet the requirements of a statement of intent or of any of the mandatory clause of the standard. Also: situation where, based on objective evidence, significant doubts arise as to product conformity.

#### 4.4.1.3 Minor NC

Even though absolute conformity with a "statement of intent" or with a requirements has not been demonstrated, there is no doubt concerning product safety and legality.

### 4.4.2 Management of NC

The follow up activities are carried out according to the next paragraphs. If the evidences provided within the established timeframe (corrective action submitted or revisit within 28 days) are assessed inadequate, the process and/or the certificate are suspended and a full site evaluation is needed.

#### 4.4.2.1 Critical NC

The certificate shall not be issued where Critical NC are detected. The NC must be corrected and appropriate Corrective Actions (CA) must be verified by DNV through an onsite audit, on a date to be agreed with the company.

#### 4.4.2.2 Major NC

The certificate shall not be issued where Major NC are detected. The NC must be corrected within 28 days from their issue and DNV must verify the implementation of the Corrective Actions. The CA may provide for temporary actions to control the situation while awaiting a final solution. The DNV assessment may be of the documentation provided by the company as proof of completion of the CA or, if the conditions so require, DNV may perform an onsite audit.

If temporary action is not possible and justified reasons to not comply with the 28 day timeline exist, and if an acceptable written explanation is provided to DNV within the aforesaid 28 day timeline, the company may remain within the certification programme – without certificate – for up to 3 months. If the CA cannot be concluded within that period, a complete audit must be repeated.

If DNV does not receive a formal commitment to carry out CA within 28 days, or if the timeline established to implement the CA is not complied with, the company shall undergo another complete audit to obtain the certificate.

#### 4.4.2.3 Minor NC

The certificate shall not be issued where Minor NC are detected. The NC must be considered and the relative CA must be implemented. Proof of CA (e.g. photographs, purchase invoices, etc...) must be presented to DNV within 28 days from issue of the NC. DNV may make another visit to check the actual implementation of the CA, or to check that this has been implemented in subsequent periodic evaluation.

## 4.5 Certification procedure

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Once the DNV offer is accepted, the organisation sends a formal application for certification and agrees with DNV on the dates to carry out the certification activities, which involve the steps set out below.

The audits MUST be carried out during production.

If there are several sites belonging to the same organisation where the same processes are carried out for the same products, specific audits must be carried out for each site, each of which will obtain its own certificate, in compliance with the result of the specific audit.

At the opening and closing meetings of the audits (initial and periodic), participation of company senior management is required, with the authority to guarantee adoption and completion of the corrective actions for any NC detected.

#### 4.5.1 Documents review (DR)

This is carried out in the company and, normally, on the same days as the subsequent applicative audit.

The documents of the Quality Management System and the Hygiene Management System are examined in order to check conformity with the requirements of the standard.

#### 4.5.2 Initial audit (IA)

After the DR, an onsite evaluation is carried out, through inspection of the site, observation of activities, informal interviews with personnel and the study of records that support conformity of the system.

The latter must allow an evaluation of the systematic application of the normative regulations. The requirement is considered satisfied if records include at least the 3 months before the audit; otherwise, the audit team shall ascertain the presence of frequent and effective monitoring activities (e.g. targeted internal audits) that can guarantee correct execution of the activities still in start-up phase, it being understood that every activity provided for (e.g. management review, internal audits, etc...) is carried out correctly at least once.

### 4.6 Evaluation report

At the end of the IA, the company will be issued with a detailed Evaluation report. This shall contain concise but complete information on the performance of the organisation regarding the areas covered by the BRC packaging standard, highlighting strengths and weaknesses of the system and providing the elements necessary to assess improvement over time (through the subsequent re-evaluation reports).

If it is not possible to issue the company with the complete report during the closing meeting, the descriptive list of any NC must be sent within 1 working day after the audit, at the most. The complete report must be sent within 42 days from the evaluation.

The company shall preserve the report for at least 5 years.

Signing the certification agreement the applicant company specifically authorizes DNV to provide the relevant audit reports to BRC or to any BRC member to whom the company provides goods or services.

### 4.7 Issue of certificate of conformity and authorisation to use the logo

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Following success of the initial evaluation and the technical review of the evaluation documentation carried out by DNV, the certified company will be assigned a single and permanent registration number and the conformity certificate will be sent within 42 days from the initial evaluation. In the event that this cannot be achieved, DNV will formally write to the applicant company stating a prospective date of issue and the reason for the delay.

According to the BRC requirements, DNV shall provide to BRC with a summary of all BRC evaluation and the supplier status, and a copy of the certificate (in Adobe Acrobat pdf format). BRC will send to the certified company a letter and the BRC Directory Form, starting the process to upload supplier information onto the BRC Directory website and to deliver the certification logo.

The BRC logo is a registered trademark and can be used only on formal authorisation according to the regulations established by the British Retail Consortium. It can never be used directly on the product and/or the product packaging.

The Organisation can communicate to the public the obtained certification, but it must take all the precautions needed to avoid any confusion between certified and non certified products.

#### 4.8 Re-evaluation audits (PA)

PA shall be carried out every 6 months initially. If no major NC are detected after the first audit, this will be reduced to every 12 months.

If even one major NC is detected during a PA, the re-evaluation will be once again carried out every 6 months, until a subsequent re-evaluation confirms the absence of major NC.

The operational modes for the PA are the same as those for the IA, as is the relative evaluation report.

##### 4.8.1 Validity of the certificate

The evaluation date, certificate issue date, re-evaluation due date and certificate expiry date are all contained on the actual certificate.

The evaluation date specified on the initial certificate is that of the principal evaluation (not the subsequent audits to conclude NC). Every subsequent date is calculated as from the date of the previous evaluation, and NOT from the certificate issue date. To ensure continuity of the certificate, the subsequent periodic audits shall be carried out within 28 days before the "re-evaluation due" date.

The first certificate expiry date is calculated from the date of the "next re-evaluation" + 42 days (e.g.: if the initial audit is 17/5/2004, the "next re-evaluation" is 17/11/2004 and the certificate expiry date is 29/12/2004). If the subsequent audits are carried out in the time frame of "within 28 days from the previous date", the subsequent certificate expiry date is 12 months from the previous date (i.e. 29/12/2005, in the above example, where the periodic audit took place between 19/10/2004 and 17/11/2004), and the date of the "next re-evaluation" is 12 months from the previous (i.e. 17/11/2005 in the example above). If the deadline for the "next re-evaluation" expires without an audit, the next audit shall be considered a new initial audit.

##### 4.8.2 Extra audits

When considered necessary (for example following motivated complaints or notice of legal action on product safety), DNV may carry out extra partial or total audits, also without notice. The costs of these additional activities shall be borne in full by the certified company.

#### 4.9 System of sanctions

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After certificate issue, where the conditions described below occur, DNV shall adopt the measures as follow. The certified organisation undertakes to inform its customers of the measures taken.

According to the BRC requirements, DNV shall immediately notify BRC in the event of certificate suspension or withdrawal and in the event of failure or renunciation of certificate renewal

#### 4.9.1 Temporary suspension of certificate

The certificate shall be suspended for 28 days at the most in the following cases:

- ♦ Where there are Critical NC
- ♦ Where there are numerous or serious Major nonconformities
- ♦ Where the conditions resulting from a legal action against the company for product safety so require, in the opinion of DNV

#### 4.9.2 Withdrawal of certificate

Consists of the total and definitive ban on using the certificate, and is established when:

- ❖ the reasons for temporary suspension have not been removed within 28 days.
- ❖ Major NC (for which the certificate was not suspended) or minor NC have not been resolved within the set times.
- ❖ Where the conditions resulting from a legal action against the company for product safety so require, in the opinion of DNV

#### 4.10 Combined audits with ISO 9001:2000

It is possible to carry out combined audits (documentation, IA/IA, PA/IA, PA/PA) for ISO 9001:2000 and BRC packaging certification. The standards can be easily integrated and are naturally complementary, even though separate reporting is necessary.

As an example, the following table of correspondence can be considered:

ISO 9001:2000		BRC – packaging	
Requirement		Requirement	
QMS General requirements	4.1	3 4.12	Hazard and Risk Management System Sub-contracting of production
Documentation requirements	4.2	4.4	Documentation control
Quality manual	4.2.2	4.2	Quality manual
Control of documents	4.2.3	4.4	Documentation control
Control of records	4.2.4	4.3	Record keeping
<b>Management responsibility</b>	<b>5</b>		
Management commitment	5.1	2.1	Organisation
Quality policy	5.3	4.1	Technical Management Policy
Responsibility, authority and	5.5	2	Organisation

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communication			
Management review	5.6	2.5	Organisation
<b>Resource management</b>	<b>6</b>		
Competence, awareness and training	6.2.2	4.13. 2 7.8 6.1.1	Product analysis Training Contamination control
Infrastructure	6.3	5 7.2 7.3 7.4	Factory Standards Locker Rooms Toilets and hand washing facilities Facilities for eating, drinking and the use of tobacco products
Work environment	6.4	5.5	Housekeeping and cleaning
<b>Product realization</b>	<b>7</b>		
Planning of product realization	7.1	3 4.5 4.8 6	Hazard and Risk Management System Specifications Process Control Contamination Control
Customer-related processes	7.2	3.1.2 4.8	Hazard and Risk Management System Complaint procedure
Design and development	7.3	3	Hazard and Risk Management System
Purchasing	7.4	4.8.5 4.11	Process Control Supplier monitoring
Production and service provision	7.5	4.8	Process Control
Control of production and service provision	7.5.1	4.8 6 7.1 7.5 7.6 7.7	Process Control Contamination Control Access and Movement of Personnel Personal Health Jewellery and personal items Protective clothing
Validation of processes for production and service provision	7.5.2	4.8.3	Process Control
Identification and traceability	7.5.3	4.7	Traceability
Preservation of product	7.5.5	6.4	Transport, storage and distribution
Control of monitoring and measuring	7.6	4.8.4	Process Control

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devices			
<b>Measurement, analysis and improvement</b>	<b>8</b>		
Internal audit	8.2.2	3.5 4.9	Hazard and Risk Management System Internal audits
Monitoring and measurement of processes	8.2.3	3.3	Hazard and Risk Management System
Monitoring and measurement of product	8.2.4	4.13	Product Analysis
Control of nonconforming product	8.3	4.6	Management of incidents and Product Recalls
Corrective action	8.5.2	4.6.5 4.10	Management of incidents and Product Recalls Complaint procedure

## 5 CHANGES IN PRODUCT AND/OR PROCESSES CHARACTERISTICS

The issued certification is valid only for the products and processes which were evaluated in conformity with the organisation's relevant technical documents.

The organisation shall timely and in writing inform DNV of any change to products and/or processes able to influence the product conformity. DNV will decide if:

- a – the changes implemented do not influence substantially the conditions for certification, and they will be verified at the next periodical audit
- b – the changes implemented affect the conditions for certification, and further evaluation is needed. In this case a specific quotation will be issued by DNV to the company.
- c – the changes implemented need a new certification

## 6 CHANGES IN THE CERTIFICATION SCHEME

In the case of substantial changes in the regulation and/or in the relevant standard, DNV will:

- ❖ Inform the concerned companies
- ❖ Specify the actual enforcement date for the new rules.

The company can renounce to the certification if it deems to not implement the needed changes. Written communication shall be sent to DNV at least 3 months in advance to any scheduled activity.

## 7 CUSTOMERS AND CONSUMERS COMPLAINTS

The organisation shall:

- ❖ record all the customers and consumers complaints connected to the certified products, and make them available to DNV when requested
- ❖ take and document appropriate actions with respect such complaints.

## 8 CONFIDENTIALITY AND ACCESS TO REPORTS

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DNV guarantees full confidentiality about all the information gained during certification activities, with the exception of possible different legal requirements and specific BRC requirements. According to the BRC requirements, the signing of the certification agreement constitutes specific and full authorization to DNV to provide the information to BRC and/or any BRC member as stated in 4.3 (incident notification), in 4.6 (audit reports), in 4.7 (summary of BRC evaluation and suppliers status and certificate copy) and in 4.9/9 (certificate suspension and withdrawal notification). DNV employee and subcontractors undersign and shall commit themselves to not disclose to third parties any information collected during auditing activities, unless authorised in writing by the company itself.

According to the BRC requirements, DNV shall give all authorised parties access to the audit reports. The certified company is responsible for granting authorisation to access the documents, but once this authorisation is granted, DNV will make available all records and all reports relating to the certification activities.

## 9 RENUNCIATION, SUSPENSION OR WITHDRAWAL OF THE CERTIFICATION

The certified company can renounce to the certification at any time, informing DNV by means of registered letter at least 30 days in advance. DNV is authorised to invoice all the activities carried out before the renunciation.

DNV can suspend the certificate validity (or withdraw it) according to the BRC rules (see § 4.9) and the following

- ❖ Improper use of the certificate (e.g. equivocal communication to the public)
- ❖ Invoice outstanding
- ❖ Lack of information to DNV concerning substantial product and/or process changes or concerning legal action (ref. 4.3)
- ❖ According to specific agreement between DNV and the company due to any reason (e.g. production suspension)

According to the BRC requirements, DNV shall immediately notify BRC in the event of certificate suspension or withdrawal and in the event of failure or renunciation of certificate renewal

## 10 MANAGEMENT OF APPEALS, COMPLAINTS AND DISPUTES

The organisation can set up written claims or appeals.

The complaints are connected to the organisation's un-satisfaction with the DNV administrative or technical performances. The Appeal is the organisation's refusal of acceptance of decisions taken by DNV during verification and certification activities. The disputes come from the organisations' refusal of acceptance of the DNV decision taken in case of appeals.

Complaints and Appeals are managed according to the procedure C5-ce-3.19. An initial response will be given within ten working days of receipt of the complaints.

Appeals will be finalised within 30 working days of receipt of information.

In the event of an unsuccessful appeal, DNV has the right to charge costs for carrying out the appeal.

In case of dispute, a decision is taken by arbitration: one independent expert is appointed by DNV, one by the organisation, and one together by DNV and the organisation. If there is no agreement,

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the third expert is appointed by the Court of Justice competent in the area where the involved DNV office is located.

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