

BRC Global Standard for Packaging and Packaging Materials

P557: Position Statement – on hygiene categories for food contact applications

Scope

Use of hygiene categories

Change log

Issue no.	Date	Description
1	June 2018	First issue

Hygiene categories

Issue 5 of the Standard altered the hygiene category determination decision tree, (see figure 1) with the effect that many food (and other hygiene sensitive products) contact materials would be subject to the requirements of the high hygiene category. The reason for the change is that although for many packaging materials physical or microbiological contamination hazards are low, chemical contamination is a real and unquantified hazard to human health and appropriate recognition of this type of hazard is required.

Subsequently, it has become apparent that many sites affected by this change have not changed the hygiene category requirements they are complying with and as a result are being audited to the basic hygiene category.

Example

Papermaking: corrugated board that is in direct contact with a food product that has a natural barrier, bananas, avocados.

As these products are still vulnerable to chemical contamination (e.g. migration), use of the category determination decision tree for Issue 5 would indicate that these corrugated cases are subject to the requirements of the high hygiene category.

Resolution

To ensure all are operating to the appropriate hygiene category level, this position statement provides a date by which all sites using basic hygiene requirements should review their hygiene category and ensure compliance with the appropriate set of requirements.

This review should assess all reasonably foreseeable uses of the packaging material, which may take account of the pack formats being produced. For example, a site producing takeaway pizza boxes (FEFCO 0426) can reasonably expect that they will be used in direct contact with hot food. Similarly, production of fruit/vegetable style trays can indicate use of that material in direct contact with fruit or vegetables. Natural barriers (fruit skins) are not a mitigating factor.

BRC Global Standards requires that **all audits to take place on or after 1st November 2018** are subject to this hygiene category review using the hygiene category determination decision tree (figure 1).

Certification Bodies and auditors undertaking audits on or after this date shall ensure that the site has completed a review of the hygiene category, and implemented any additional requirements that have not been addressed by the current system. This may consist of:

- The intended use has been reviewed as part of the hazard and risk analysis (HARA)
- The scope of the HARA states that the product is for non-direct contact use only
- Indirect use only is included on the Declaration of Compliance (DoC) (3.4.3)

Document P510 – Hygiene category comparison tool may be helpful for sites to identify the differences between the two hygiene categories. This is available from the Packaging [Help & Guidance](#) pages at www.brcglobalstandards.com.

Calibration

A calibration audit for all auditors and certification body personnel will be arranged to cover this topic.

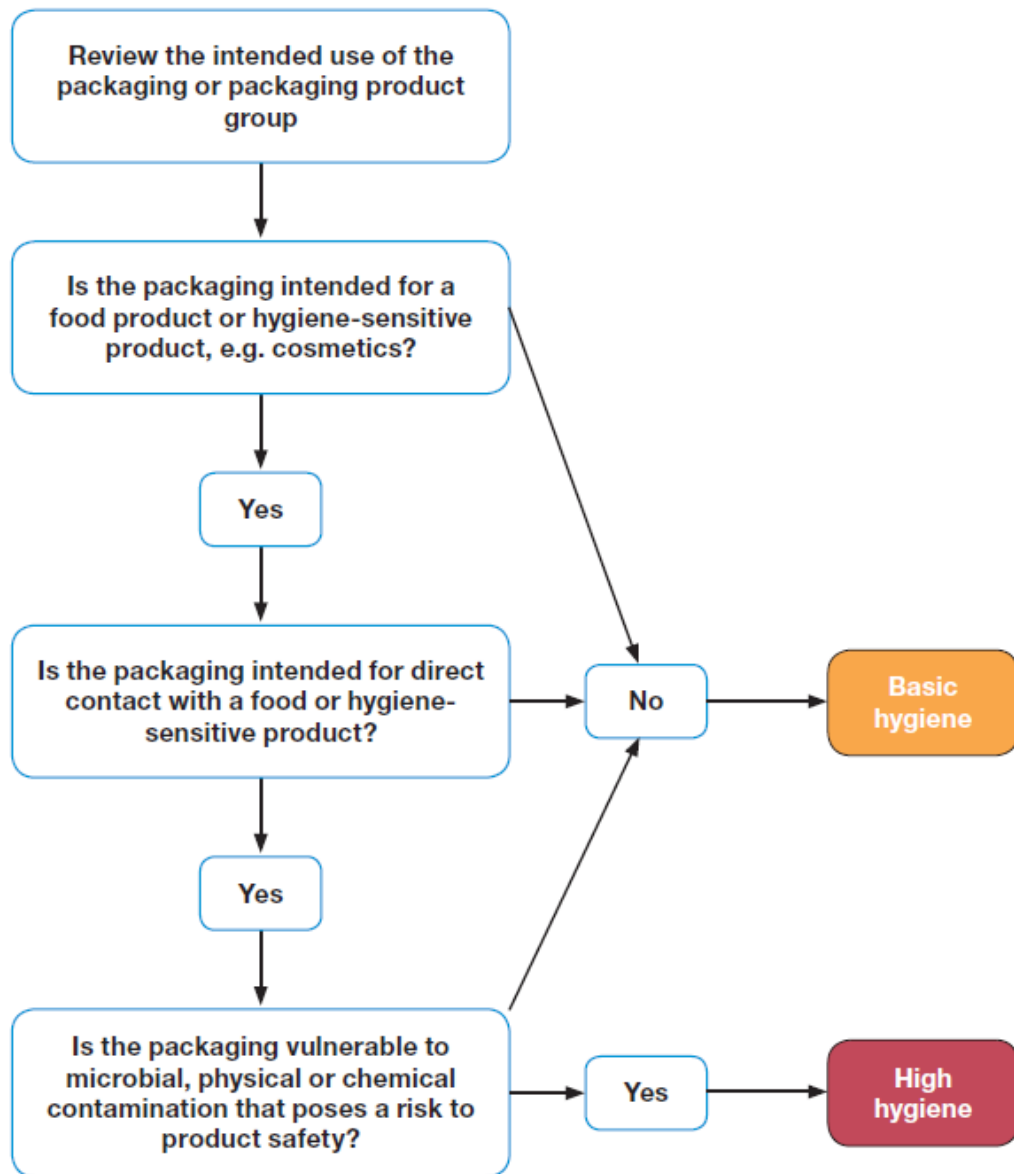


FIGURE 1 HYGIENE CATEGORY DETERMINATION DECISION TREE