SPECIAL RULES FOR THE ISSUE AND MAINTENANCE OF CERTIFICATION TO GLOBAL STANDARD PACKAGING and PACKAGING MATERIALS

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Art. 1 Subject of the Regulation

This Regulation establishes the procedures applied by CSICERT System to manage the certification scheme for production processes of Organizations in accordance with the requirements of Global Standard Packaging and Packaging Materials issued by British Retail Consortium (BRC).

This regulation defines the supplementary conditions and procedures for this specific plan in addition to those already set forth in the following documents:

- "General regulations regarding product certification (Reg. prod. 001/04)";
- "Product conformity certification procedure (PR 60B)";
- "Regulation regarding the use of product/service certification logos".

Hence, these documents fully apply to this plan except for the changes set forth in this regulation.

Art. 2 Reference documents

2.1 Global Standard Packaging and Packaging Materials requirements

Requirements that Organizations must meet to obtain the certificate addressed in these Special Rules are explained in detail in the technical norm of Global Standard Packaging and Packaging Materials (current issue), issued by British Retail Consortium (BRC). This standard represents the reference standard for European large-scale retail-trade organizations.

The Global Standard Packaging and Packaging Materials norm applies to the manufacture of packaging and packaging materials used in food packaging and filling operations and to packaging and packaging materials for cosmetics, toiletries and other consumer products and materials. The norm does not apply to wholesale, import, distribution and storage, in case these operations are performed beyond the Organization's control.

2.2 Certification scheme references

CSICERT takes the following documents into consideration while applying the this plan:

- Global Standard Packaging and Packaging Materials (current issue)
- POSITION STATEMENTS and GUIDANCE NOTES (current issue).

Art. 3 Special rules

3.1 Choosing manufacturing category

Although Global Standard Packaging and Packaging Materials is not a technical standard structured for product sectors, it classifies products and corresponding processes that can be subject to certification under categories and packaging fields described within the standard.

Appendix 3: Examples of fields of audit:

High Hygiene

Basic Hygiene

Appendix 2: Manufacturing category described as following:

01 Glass manufacture and forming

02 Paper making and conversion

03 Metals forming

04 Rigid plastics forming

05 Flexible plastics manufacture

06 Other manufacturing

07 Print processes

08 Chemical processes

3.2 Prices

CSICERT elaborates and sends a specific offer to every company which requests quotation, complete with all the information concerning technical aspects and prices. Monetary terms are established according to CSICERT price list.

3.3 BRC standard conformity conditions

When the Company to be certified submits its application, it commits itself to fulfilling all the special rules and reference documents that apply (see art. 2) to the certification to Global Standard Packaging and Packaging Materials and meeting all of its requirements. Furthermore, the organization must meet all applicable requirements set forth by the reference standards.

The Global Standard Packaging and Packaging Materials norm applies to the manufacture of packaging and packaging materials used in food packaging and filling operations and to packaging and packaging materials for cosmetics, toiletries and other consumer products and materials.

The Global Standard for Packaging and Packaging Materials requires the development of and compliance with the following:

- Senior Management Commitment
- A hazard and risk analysis management plan
- A Quality Management System
- Prerequisite Programmes

These elements are organized within the technical standard under 6 chapters, namely the following:

Chapter 1 Senior Management Commitment

Chapter 2 Hazard and Risk Management System

Chapter 3 Product and Safety Quality Management

Chapter 4 Site Standards

Chapter 5 Product and Process Control

Chapter 6 Personnel

Each chapter consists of sections, which are in turn structured in requirements.

In the standard are also identified 8 key requirements, specified in the particular sections of the chapters, which must be continuously maintained and monitored by the Organization, namely:

- Senior management commitment and continual improvement (clause1.1)
- Hazard and risk analysis (clause 2.2)
- Specifications (clause 3.4)
- Internal audits (clause 3.5)
- Traceability (clause 3.9)
- Housekeeping and cleaning (clause 4.8)
- Process control (clause 5.4)
- Training and competence (clause 6.1)

Failure to comply with the statement of intent of a fundamental requirement (i.e. a major non conformity) leads to non-certification at an initial audit or withdrawal of certification at subsequent audits. This will require a further full audit to establish demonstrable evidence of compliance.

3.4 Non conformity classification

Global Standard Packaging and Packaging Materials define 3 Non conformity levels:

Critical Where there is a critical failure to comply with a product-safety or legal requirement.

Major Where there is a substantial failure to comply with the statement of intent of a clause or any requirement of the Standard, or where a situation is identified which would, on the basis of available objective evidence, raise significant doubt as to the conformity of the product being manufactured.

Minor Where a requirement has not been fully met but, on the basis of objective evidence, the conformity of the product is not in doubt.

The audit results are to be considered preliminary as far as the assessment results for certification purposes are concerned. As a matter of fact, it is the CSICERT Certification Committee that shall decide whether to issue a certificate based on the outcome reported on the BRC IoP assessment report as well as corrective actions and proofs given by the Organization.

3.5 Certification process

When the Company accepts the offer, the organization sends a formal certification request an decides on the date with CSICERT when the certification activities are going to be performed, which consist of the stages described as follows.

The typical duration of an audit will vary from 1 to 3 days (8 hours per day) at the site. To ensure consistency, a calculator has been developed to assess the expected time required to undertake the audit of any particular site and this shall be used as the basis for calculating the total audit duration. Full details can be found on the BRC Global Standards website (www.brcglobalstandards.com).

Furthermore, it is possible to perform consecutive and or combined audits at Organization Site. Certification combined audit with IFS Standard where possible. In this situation additional on site time has to be consider for calculation. Certification consecutive audits

with ISO 9001:2000 and ISO 22000:2005 standards. In this situation audit duration depends according to each single certification protocol.

3.5.1 Global Markets Programme

The programme is designed for sites which are either very small and for which the full Standard may not be appropriate or for sites which are in the development process of their food safety management systems.
The programme is based on the principles of the GFSI Global Markets Programme and it allows an audit and recognition of attainment of compliance at two levels (Basic and Intermediate), below full certification.

3.5.2 Announced audit programme

This is available for all sites; the audit date is agreed with the Certification Body in advance of the audit and all requirements of the Standard are audited within the audit visit. This is the most commonly selected certification audit type. Successful sites award a certificate with the grade AA, A, B, C or D, depending on the number and type of non-conformities identified.

3.5.3 Unannounced audit programme

The unannounced audit options are available to all sites although sites which are not currently certificated need to recognize that the audit may not take place for up to 1 year from the date of application.

The unannounced audit options provide sites with the opportunity to demonstrate the maturity of their quality systems and successful sites are awarded grades of AA+ (the top BRC grade), A+, B+, C+ or D+. The conducting of an independent, unannounced review of systems and procedures under this scheme provides a company's customers with added confidence in the company's ability to consistently maintain standards. This may influence the frequency of customer audits, where conducted, and other performance procedures applied by the customer.

There are two options for unannounced audits, which allows companies to decide the one best suited to their business requirements; the grading and reporting for each is the same. With both options the date of the audit of the factory good manufacturing processes (GMPs) is unannounced.

For option 1, the whole Standard is audited on a single unannounced audit visit, typical duration of an audit will vary from 1 to 3 days (8 hours per day) at the site. To ensure consistency, a calculator has been developed to assess the expected time required to undertake the audit of any particular site and this shall be used as the basis for calculating the total audit duration. Full details can be found on the BRC Global Standards website (www.brcglobalstandards.com).

For option 2, the audit visit is split into two separate visits, each typically lasting one day. The first visit, which is unannounced, audits predominantly factory GMPs, as highlighted by the colour-coding system in the Standard requirements. The second part of the audit, which is planned, audits predominantly the documented systems and records.

The typical duration of an audit will vary from 1 to 3 days (8 hours per day) at the site. A calculator has been developed to assess the expected total time required to undertake the audit of any particular site, to ensure consistency, and this shall be used as the basis for

calculating the total audit duration. Full details can be found on the BRC Global Standards website (www.brcglobalstandards.com).

3.5.4 Initial certification audit

The following tasks are to be performed in the following order:

- initial meeting;
- document analysis;
- audit on the site and the structure;
- audit on the production units;
- final meeting.

At the final meeting, the Lead auditor of the assessment group informs the Organization of the outcome of the audit and gives explanations as to the result thereof.

3.6 Evaluation report

Audits results are formalized in a special BRC IoP Global Standard for Packaging & Packaging Materials evaluation report. The audit report assist the reader to be informed of:

- the food safety controls in place and improvements since the last audit
- 'best practice' systems, procedures, equipment or fabrication in place
- non-conformities, the corrective action taken and plans to correct the root cause.

Before issuing the audit report, CSICERT issue a corrective actions plan for the Organization during the audit or no later than the following deadlines, which contains instructions regarding the deviation and/or Non conformity encountered, if applicable, and their classification.

Certification process management follows the timeline below:

CSICERT sends the corrective actions plan no later than 1 days following the audit. Organization draws up the proposal for corrective actions, the corrective actions and concerning evidence no later than 28 days following the audit.

CSICERT assesses the proposals submitted and adds them to the assessment plan no later than 42 days following the audit. Within this time CSICERT issue the detailed evaluation report.

The evaluation report is a document of ownership of the Organization and may not be delivered to third parties, unless authorized by that Organization.

3.7 Issuance of certificate and authorization to use the certification logo

Based on Global Standard Packaging and Packaging Materials requirements, the decision whether or not to issue the certificate is taken depending on the type of "non conformities" encountered, depending on the following summary chart (Table 2.)

Inside Table 1 is also indicated for each case study, the relevant assets charged to the organization and CSICERT.

Table 1

Typology NC	Decision	Activity in charge to auditee	Activity in charge to certification body (CSICERT)
CRITICAL clauses FONDAMENTAL	Critical non-compliances do not allow the issuance of the certificate.	The Organization must formulate and take appropriate corrective action	Certification is not granted. Performing a complete additional assessment
MAJOR clauses FONDAMENTAL	Major Non-conformities do not allow the issuance of the certificate	The Organization must formulate and take appropriate corrective action	Certification is not granted. Performing a complete additional assessment
MAJOR clauses NO FONDAMENTAL	Major non conformities Do not allow the issuance of the certificate till closure	The Organization must submit the draft resolution and implement corrective actions within 28 days from the date of the audit	Evaluation of NC proposals resolution Evaluation of corrective actions taken (evidence of implementation). Note: The verification of the correct implementation of CA can be carried out by the CB including documents, without the need for further inspection. Decision on the certification within 42 days from the date of initial inspection
MINOR	Minor non conformities Do not allow the issuance of the certificate till closure	The Organization must submit the draft resolution and implement corrective actions within 28 days from the date of the audit.	Evaluation of NC proposals resolution Evaluation of corrective actions taken (evidence of implementation CA). Note: The verification of the correct implementation of CA can be carried out by the CB including documents, without the need for further inspection. Decision on the certification within 42 days from the date of initial inspection

Global Standard Packaging and Packaging Materials certificate of conformity certifies the conformity of the Organization's production processes to the requirements set forth in Global Standard Packaging and Packaging Materials

It is issued in English and states in particular the level of conformity reached by the Organization (GRADE) and the subsequent period of validity.

Table 2 shows the criterion for determining the compliance level (grade). Certificates of conformity issued remain the property of CSICERT.

Table2

GRADE Announced audit	GRADE Unannounced audit	CRITICAL NC	MAJOR NC	MINOR NC	CORRECTIVE ACTION	AUDIT FREQUENCY
AA	AA+	-	-	Up to 5	Evidence within 28 days	12 months
A	A+	-	-	6 to 10	Evidence within 28 days	12 months
B	B+	-	-	11 to 16	Evidence within 28 days	12 months
B	B+	-	1	Up to 10	Evidence within 28 days	12 months
C	C+	-	-	17 to 24	Evidence within 28 days	6 months
C	C+	-	1	11 t 16	Evidence within 28 days	6 months
C	C+	-	2	Up to 10	Evidence within 28 days	6 months
D	D+	-	-	25 to 30	Evidence within 28 days	6 months
D	D+	-	1	17 to 24	Evidence within 28 days	6 months
D	D+	-	2	11 to 16	Evidence within 28 days	6 months
Certification not granted		1 or more	-	-	Necessary repeat the audit	-
Certification not granted			1 or more (Fundamental Req.)	-	Necessary repeat the audit	-
Certification not granted		-	-	31 or more	Necessary repeat the audit	-
Certification not granted		-	1	25 or more	Necessary repeat the audit	-
Certification not granted		-	2	17 or more	Necessary repeat the audit	-
Certification not granted		-	3 or more	-	Necessary repeat the audit	-

The period of validity of the certificate of BRC depends on the level of compliance attained by the organization, as shown in Table 2.

Certification period is always calculated from the date of the audit, adding the estimated time (6 or 12 months, depending on the level of compliance achieved) and additional 42 days.

Information about certificated companies is provided to the BRC by Certification Bodies. The Directory www.brcdirectory.com. provides the following publicly available facilities:

a searchable list of certificated companies, including contact details, the Standard against which they are certified, scope and links to their website ;

a searchable list of approved Certification Bodies, including local offices and contact details.

Note that whilst all reports and certificate details shall be uploaded onto the Directory, companies may choose not to appear on the public directory site if they so wish; this will not, however, exempt sites from the registration fee.

The Global Standards Directory provides additional functionality to key user groups, including companies, retailers and Certification Bodies. This includes user-specific access to

certification information, audit reports and management reporting, further enhancing the value of obtaining BRC certification.

The logo that the certified organization may be used and their rules are established by the British Retail Consortium (BRC). Information relating to the above are available at the following web address: www.brcdirectory.comdirectory BRC Global Standards.

3.8 Renewal Audits

According to Global Standard Packaging and Packaging Materials renewal and re-certification audits are performed in accordance with the provisions of article 3 – Special Rules.

Certification re-audit due date is always calculated from the date of the audit, adding the estimated time (6 or 12 months, depending on the level of compliance achieved).

It is responsibility of the site maintain certification by ensuring that announced certification audits occur on or before the re-audit due date indicated on the certificate.

3.9 Sanction

A part from the provisions of the general rules (Reg. prod. 001/04), the following apply: after the certificate is issued, CSICERT shall take the following measures, in case the conditions defined below. The organization under certification is supposed to inform all of its clostumers of the measures taken, as set forth by the reference standards.

3.9.1 Suspension of the certificate

The certificate will be suspended temporarily under the following circumstances:

- In case of non-conformities classified as CRITICAL for FONDAMENTAL requirement
- In case of non-conformities classified as CRITICAL for NON FONDAMENTAL requirement
- In case of non-conformities classified as MAJOR for FONDAMENTAL requirement

3.9.2 Withdrawal of the certificate

Withdrawal of the certificate means that the company is barred from using the certificate and certification logo completely and definitively and it occurs under the following conditions:

- Reasons amounting to temporary suspension
- Company closure

3.10 Surveillance of Certificated Companies

For certificated companies, where appropriate, the Certification Body or the BRC may carry out further audits, or question activities to validate continued certification, at any time. These visits may take the form of announced or unannounced visits to undertake either a full or partial audit.

Where justifiable, suspension or withdrawal of certification may be implemented pending the outcomes of such further reviews by the Certification body.

If there is no intention by the company to take appropriate corrective actions or the corrective actions are deemed inappropriate, certification shall be withdrawn. The ultimate decision to suspend or withdraw certification remains with the Certification Body. Any change in certification status shall be notified to the BRC by the Certification Body and the status on the BRC Directory amended accordingly.

3.11 CSICERT costumers complaints management and appeals

CSICERT QM procedure are in place for consideration and resolution of appeals against the results of an audit. These procedures are independent of the individual auditor and will be considered by senior management of the certification body. Appeals will be finalised within 20 working days of receiving information from the auditee.

CSICERT QM procedure are in place for handling complaints received from the companies and/or other relevant parties. An initial response will be given within ten (10) working days of receiving the complaint. A letter confirming receipt of the complaint will be issued within a maximum of five (5) working days. A full written response will be given after the completion of a full and thorough investigation into a complaint.

For the handling of complaints received by the BRC offices, the basis for the complaint management is as following :

If the complaint relates to the quality of the content of BRC audits or BRC audit reports, the certification body will provide a statement on the cause and the measures introduced to rectify the problem within 2 weeks.

If the complaint relates to administrative errors, e.g. in BRC audit reports, BRC certificates or in the BRC database, the certification body will provide a statement and rectify the problem within one (1) week. The statement shall be issued in writing by email or post.

3.12 Communication with certification body

The organization has a responsibility to inform the certification body if between two certification audits were activated or introduced new processes or products other than those included in the scope of certification. After that certification body will perform a risk assessment to decide whether or not an audit is required.

The organization has a responsibility to inform the certification body with respect to any changes or information indicating that the product / process does not meet the requirements of the certification system (e.g., RECALL, ALERT, etc.). This information will be done to the certification within 3 working days.

Art. 4 Exceptions to the confidentiality clause

It being understood that the confidentiality clause is to be applied at all times, in case of particular legal actions, BRC might require to CSICERT as an expert witness. In that case, the company under certification grants CSICERT with the right to fulfill this role, by signing the certification contract, so that it can provide BRC with the necessary information regarding inspection checks performed in accordance with BRC Global Standard for Food Safety standards.

Art. 5 Certification contract

The company under certification and the certification organism enter into a certification contract, which sets forth the methods and constraints for providing the service. The contract must be signed by both parties.