

**PACKAGING
MATERIALS**

**Packaging Sites
Restart after
Covid-19**

BRCGS GUIDANCE DOCUMENT
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after Covid-19

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Packaging sites restart after Covid-19

The Covid-19 pandemic and subsequent lockdown knocked the momentum out of the events following go live for audits on February 1, 2020.

Whilst many European countries across Europe and the UK are cautiously lifting restrictions with the daunting prospect of a second wave, other countries find themselves just entering the storm.

During the last 5 months Packaging sites could apply for a 6-month extension of their certificate under issue 5 of the Standard. As audits commence against issue 6, this guidance serves as a reminder of some of the major changes in Issue 6 and practices sites are encouraged to put in place as they open again for business and restart operations.

Key changes to Issue 6



The importance of a product safety and quality **culture** in the drive to improve transparency and coherence across the supply chains of food and non-food products. Sites should be working towards putting an effective plan in place for the development and continual improvement of their product safety and quality culture. Audits will commence against **clause 1.1.2** from 1 February 2021.



Introducing a new fundamental clause, **corrective and preventive actions**, to address issues and minimise the risk of their occurring



Based on risk, putting a **microbiological environmental monitoring** programme in place.



Simplifying the hygiene requirements based solely on risk. For sites formerly operating to basic hygiene or new sites manufacturing packaging materials for non-food, non-hygiene sensitive products, please refer to the **transition guide for basic hygiene sites** available in the bookshop or on Participate.

Restart – the new norm

Introduction

The restrictions which many countries have brought into place to manage the spread of Covid-19 have in turn severely impacted the packaging industry and the manufacture of non-food consumer products. Consumer buying patterns such as panic buying and increased online purchases have tested the ability of some supply chains to respond whilst on the other hand closures of food service outlets and non-essential consumer goods retail has resulted in loss of markets for others. In addition, with the significant shift to online purchases brands have begun to review traditional forms of on-shelf packaging and labelling.

Much of the effort has focussed on keeping supply chains open for food, medical supplies, chemical cleaning agents and personal protective equipment. During the peak of the crisis, there have been labour shortages and restrictions of critical raw materials and chemicals used in the manufacturing process. For example, ethanol and n-propanol used in printing inks were diverted for use in pharmaceuticals, disinfectants, and sanitary products such as hand gels driving up the cost of solvents. Packaging materials classified as essential include cardboard, paper, glass, metal cans and plastics. Due to recycling challenges resulted in a decrease in recycled fibres from cardboard and paper board. Bottle closures were diverted for food, cleaning and personal care products putting pressure on supply chains as China and Northern Italy represent the main source of supply. The agenda for packaging has shifted temporarily from sustainability to endurance with single use plastic in demand again because of consumer concerns around safety and hygiene. Some of the larger retailers are nevertheless advocating the use of returnable or re-useable packaging particularly for deliveries.

Much of the focus in factories has rightly been on changing the ways of working introducing social distancing and new working practices to safeguard the health of workers and ensure product safety.

Objective

This guidance document has been produced primarily to complement the BRCGS Packaging Materials Standard for food contact and non-food contact packaging. It will also be relevant to certain products certificated to the Consumer Products Standard such as hygiene-sensitive products and personal protective equipment, PPE. It is intended to help site managers fine tune their product safety management systems to cope with the new position which the industry now faces as restrictions are lifted around the world.

RESTART -12 POINT PLAN

People

1 Senior management

The sites senior management review the company policy and objectives, making amendments where necessary to reflect the business needs.

A review of changes required and any necessary investment to resources in terms of materials, product specifications, equipment, human and building fabric/layout to meet the agreed guidelines at national and regional levels to ensure product safety and protect staff and essential visitors.

The pandemic undoubtedly would be classed as a sustained incident from which learnings need to be compiled and documented for future reference.

2 Staff and temporary workers

One of the consequences of the Covid-19 situation has been a significantly reduced workforce as a result of sickness or self-isolation; Staff that have been furloughed or made redundant due to significant changes in product demand. The increased risk from the use of temporary workers with limited or no experience needs to be managed to ensure product safety and quality to reduce wastage and avoid high return rates.

Senior management need to build into their business continuity policy a return to work strategy that covers agreed guidelines at national and regional levels on social distancing, provision of personal protective equipment, track and trace.

3 Communications

The crisis has afforded businesses the opportunity to plan and build a strong product safety and quality culture where a clear effective two way communication strategy. The latter is employed to share important information and build a positive approach to product safety and quality throughout the site. New staff and all assigned deputies across the whole management and supervisory team must be reflected in the organisational structure and any new/changed policies and workflows documented.

4 Training

To maintain control of product and processes, training programmes must continue for new and existing staff.

It is particularly important that training is provided for new and temporary employees taken on, either directly, or through agencies because many may be new to the packaging industry.

Consideration must be given to where the training takes place to allow adequate social distancing for safeguarding the health of all involved.

Virtual and e-learning methods with on-line assessments are the new normal so the site should review which parts of training can be done virtually (induction including site processes, actions and contacts in case of an emergency, health & safety and signage for hygiene and one-way people traffic flow, sickness reporting, product knowledge, cleaning methods and waste management) and which aspects need to be done on the site (line clearance, in-line

measurements, machine adjustments and set up). The number of trainees to trainer must be assessed to safeguard the staff and appropriate personal protective equipment provided and worn.

Training procedures, training records and competency assessments must be updated and documented.

Premises

5 Security

At the beginning of the crisis emergency security measures would have been in place for the sites that remained open. This may have included prohibition of non-essential visitors, a daily list of people coming to the site, additional protection for security/gate staff, additional checks for essential visitors, temporary workers and deliveries/dispatch drivers. As restrictions are lifted and some businesses open for the first time, the site HARM team shall review the risk assessment for the site security and product defence plan and where necessary make amendments for how this is implemented. People coming to the site should be given advanced notice of amendments to procedures electronically. Amendments could include

Creating markings and introducing one-way flow at entry and exit points.

Providing handwashing facilities, or hand sanitiser where not possible, at entry and exit points.

Requiring staff to use keypads or passes and adjusting processes at entry/exit points and clean them regularly to reduce risk of transmission.

6 Building Layout/building fabric

Most people are familiar with the recommendations on social distancing whilst out shopping and in recreational spaces. This is a key consideration for entry into the site and movement within the building. The Standard already requires the site to have a map or plan of the building detailing access points, travel routes for people, materials, storage, and waste, and also product and process flows. Based on risk, the site plan will need to be amended to accommodate appropriate social distancing. In addition, the site needs to review layouts, ventilation, line set-ups or processes.

7 Cleaning

Frequent cleaning of work areas and equipment between uses, clearing workspaces and removing waste and belongings from the work area at the end of a shift.

Cleaning schedules and procedures will need to be adjusted and validated to allow more frequent cleaning of objects and surfaces that are touched regularly, including door handles, pump handles and printers. The site must be able to demonstrate that the cleaning chemicals are fit for purpose.

Where there has been a known or suspected case of COVID-19, then cleaning procedures must follow agreed guidelines at national and regional levels for non-healthcare settings.

For reusable PPE, it is important that it can be

- individually marked to be identifiable to the wearer
- effectively cleaned after each use
- safely and hygienically stored between shifts where existing locker space may not be adequate

Some of the measures that could be employed include;

Increase the frequency of hand washing and provide suitable hand drying facilities and use of signage and posters to build awareness of good handwashing technique.

Use screens or barriers to separate people from each other.
Use a one-way flow of people and material traffic.
Avoid face-to-face where possible and use back-to-back or side-to-side working.
Use 'fixed teams or partnering' so each person works with only a few others.
Review shifts and break times to reduce congregation of people in the corridors, staff changing rooms and canteen.

8 Equipment and vehicles

To safeguard health of staff and protect product safety and quality the HARA needs to be reviewed should additional measures be required such as:

Cleaning procedures for the parts of shared equipment such as production equipment, tools, and vehicles, for example, pallet trucks and forklift trucks.

More handwashing stations for workers handling product or providing hand sanitiser where this is not practical.

Review maintenance requirements for critical and non-critical equipment, new and existing. This is important particularly for equipment that has not been in use and also equipment that has been used for extended production runs where there exists a risk of failure/ breakdown.

9 Waste management

The site needs to provide more waste facilities and more frequent rubbish collection to avoid clutter. Extra **non recycling** bins for staff, contractors, and visitors to dispose of single use face coverings and other PPE.

Products

Studies show that the virus can remain infectious on different types of packaging for varying times depending on the material. However, expert advice including that of the world health organisation (WHO) is that the risk of catching the virus that causes COVID-19 from a package that has been moved, travelled, and exposed to different conditions and temperature is also very low. Whilst packaging is not known to present a specific risk, efforts should be made to ensure it is cleaned and handled in line with usual product safety practices

10 Raw material suppliers

During the crisis use of emergency suppliers of raw materials, solvents, inks, component, processing aids would have occurred. New suppliers approved through the emergency procedures need to be identified as such in the quality system to allow for a more formal review when the situation returns towards normal. Sourcing locally could result in brand owners and sites retaining some of these emergency suppliers for the foreseeable future.

The basis for acceptance of the raw material, component or processing aids should be documented covering the following information:

- material/component specification
- identification of any significant variance from the current raw material/component it will be used to replace
- any potential effect on finished packaging safety and quality
- relevant updates to the vulnerability assessment plan where there is a risk of fraud or substitution
- statement of compliance (where relevant)

For each new raw material to be used a full list of finished packaging for which the raw material will be used to manufacture should be compiled and reviewed with particular emphasis on any packaging claims being made which may be affected by the change of raw material.

11 Finished packaging

Supply chain disruptions, material shortages and reduced recycling have made people realise that we have seen an increased recognition that, without the right packaging, supply chains would fail. Some innovation has also come from the Covid-19 crisis where manufacturers have had to adapt quickly to changing demands. Customer-approved label changes must be reviewed to prevent any mix-ups between temporary and existing stocks of packaging that have been kept for future use when normal supply arrangements return. The site must ensure the following:

- clear identification on outer boxes overwrap etc to differentiate new and previous print runs
- clear segregation of new and existing incorrect label stock during storage
- additional specific checks on-line to ensure the correct print run is being used.

12 Traded products

Sites need to consider what happens to traded products stored on the premises prior, during and after shutdown.

Traded Products bought in by the site and sold on without further processing or repacked should be treated as any material brought onto the site. These types of products may be more susceptible to substitution and fraudulent activity and so require more scrutiny due to potential quality issues. Sites should pay attention to the following areas

- supplier approval and monitoring
- regular specification checks against customer requirements and
- verification of conformity and product status (claims) are critical during and after Covid-19.

Customers purchasing trading products may require additional assurance from the site to confirm product authenticity and safety.

Conclusion

As packaging sites work to meet the shifting demand within the consumer market, they need to be more agile and responsive in terms of raw material sourcing, sustainability trends and ultimately continually having to adjust the portfolio of packaging materials they offer.

The changes which all businesses have had to make introduce new challenges to the way that sites manage the safety and quality of packaging as industry comes to terms with potential disruption and re-routing of supply chains, heightened hygiene requirements, staff absenteeism and an influx of new temporary workers to the manufacturing industry.

This guidance is published alongside a set of complimentary subject guides, useful links and webinars which are all available on the BRCGS website [brcgs.com](https://www.brcgs.com) in the section titled Restarting your Business Post Covid-19: Restart, Reshape, Reinforce.

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