Packaging Compliance 2026: How Quality Managers Prepare for Peak Audit Season

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Executive summary

Packaging compliance has moved from a supporting function to a **critical audit risk area.**
In 2026, Quality Managers face increasing scrutiny around:

- food contact materials
- traceability of packaging components
- supplier validation
- hygiene and change control
- alignment between food safety, regulatory compliance, and sustainability claims

What has changed is not only the number of requirements, but **how auditors evaluate packaging systems.** Audits increasingly focus on **system coherence, validation depth, and preparedness,** especially during peak audit periods.

This whitepaper provides a **practical preparation framework** to help Quality Managers:

- reduce audit days on site
- avoid repeat non-conformances
- improve audit predictability
- protect their teams during peak audit season

What we typically observe across packaging audits

Based on aggregated audit experience across food manufacturing operations, Quality Managers who prepare packaging compliance systematically before peak audit season typically experience:

- **20–30% fewer on-site audit days** across food safety and packaging audits
- **25%+ reduction in repeat non-conformances** linked to documentation, scope, and supplier validation
- **More predictable audit outcomes,** with fewer last-minute corrective actions

These improvements are driven by earlier preparation and system alignment – not by adding controls.

1. Why packaging audits are harder in 2026

Packaging now sits at the intersection of:

- food safety
- regulatory compliance
- sustainability expectations
- supply chain transparency

Auditors no longer assess packaging in isolation. They expect Quality Managers to demonstrate that packaging controls are:

- risk-based
- validated
- integrated into the food safety management system
- aligned with regulatory and customer expectations

At the same time, audit calendars are increasingly congested, increasing pressure on preparation quality and timing.

2. What auditors expect from packaging systems today

Across food safety and packaging audits, auditors consistently assess four dimensions:

2.1 System integration

Packaging controls must clearly link to:

- HACCP analysis
- supplier approval
- change management
- corrective and preventive actions

Fragmented documentation is one of the most common drivers of audit inefficiency.

2.2 Validation of food contact materials

Auditors expect documented evidence that:

- materials are suitable for intended use
- migration risks have been assessed
- declarations of compliance are current and complete

Assumptions or outdated documentation are increasingly challenged.

2.3 Traceability depth

Traceability must extend beyond finished products to include:

- packaging raw materials
- converters and subcontractors
- batch-level linkage where applicable

Packaging traceability gaps often escalate findings from minor to major.

2.4 Hygiene and operational discipline

Packaging production and handling environments are scrutinized for:

- hygiene zoning
- contamination prevention
- personnel practices
- organisational culture

These elements are often assessed through **observation,** not documentation alone.

3. Common failure patterns seen during peak audit season

Peak audit periods amplify existing weaknesses. Common patterns include:

- packaging documentation prepared late or inconsistently
- supplier changes not fully validated
- sustainability-driven material changes without full safety assessment
- corrective actions still open when audits begin
- audit scope expanded unexpectedly due to missing clarity

These issues rarely stem from lack of competence. They stem from **timing, coordination, and system fragmentation.**

Example:

Observed pattern during peak audit season

In operations where packaging documentation and scope validation are prepared late, auditors typically spend more time reconciling evidence, resulting in longer audits and repeated findings.

By contrast, sites that complete packaging readiness reviews **90–120 days before audits** generally reduce:

- time spent on document review during audits
- repeat findings related to food contact materials and supplier scope
- corrective action workload post-audit

4. A practical preparation framework for Quality Managers

High-performing teams prepare packaging compliance in stages, not all at once.

Stage 1 – Clarify scope early

- confirm which packaging activities fall under audit scope
- align scope across food safety and packaging standards
- validate supplier and subcontractor responsibilities

Stage 2 – Validate documentation and evidence

- review declarations of compliance
- verify testing and validation records
- confirm traceability documentation completeness

Stage 3 – Stress-test operational controls

- verify hygiene practices in real operating conditions
- review change management for materials and suppliers
- assess staff understanding of packaging risks

Stage 4 – Plan audits proactively

- schedule audits well in advance
- align packaging audits with food safety audits where possible
- close corrective actions before audit dates

This staged approach reduces last-minute remediation and improves audit efficiency.

5. Audit outcome benchmarks linked to early preparation

Quality Managers who plan packaging audits well ahead of peak season – and align scope, suppliers, and validation early – consistently report:

- shorter audit duration (often saving half to 1 audit day per site)
- fewer repeat findings linked to packaging documentation and change management
- faster audit close-out, because corrective actions are already addressed

Early preparation functions as a risk-reduction control, not an administrative task.

6. Aligning packaging compliance with sustainability goals

Sustainability-driven packaging changes introduce new risks when:

- material performance changes
- supplier chains shift
- documentation lags behind implementation

In 2026, auditors increasingly expect Quality Managers to demonstrate that:

- sustainability decisions are risk-assessed
- food safety validation remains primary
- claims are defensible and auditable

Packaging compliance must therefore be **aligned,** not traded off, against sustainability goals.

7. Preparing your team for peak audit season

Beyond systems and documentation, preparation is about **people and timing**.

Effective Quality Managers:

- define clear responsibilities early
- brief teams well before audits
- avoid overlapping audits and production peaks
- protect team capacity during critical periods

This reduces stress and improves audit performance.

Appendix:
Mapping Packaging Safety Actions to GFSI Clauses

Packaging Safety Action	BRCGS Packaging (Issue 7)	FSSC 22000 / ISO 22000	IFS PACsecure
Risk-Based Packaging Assessment	2.1.1.1 / 2.2.1	ISO 22000: 6.1 / 8.5	4.1 / 4.2
Hygiene Controls During Production	4.5.1 / 4.8	ISO/TS 22002-4: 4.4 / 4.10	4.9
Packaging Traceability	3.9 / 5.6.1	ISO 22000: 7.9	4.4.1
Non-Conformity Management	5.1.1 / 5.5	ISO 22000: 10	5.1
Documented FSMS Alignment	1.1.2 / 2.1	ISO 22000: 7.5	4.1.1

Note: This is a sample extract. A more detailed audit clause crosswalk is available upon request.

Real-World Readiness: A Quick Turnaround Case

A mid-sized packaging converter preparing for BRCGS Packaging Issue 7 used FoodChain ID's pre-audit checklists and PFCS guidance to fix 3 nonconformities in under 30 days. This included updating hygiene SOPs, improving traceability records, and refreshing team training. According to their QA Manager, 'The timeline and tools helped us build confidence—and we passed our audit with zero majors.'

Your 90-Day Packaging Audit Readiness Plan

Accelerate your compliance journey with this structured 3-month plan designed to align packaging safety with audit expectations under BRCGS Issue 7 and related GFSI standards.

Weeks 1-2

Gap Assessment & Risk Review

Weeks 3-4

Hygiene Controls & Document Updates

Weeks 5-6

Staff Training & Internal Audit

Weeks 7-9

Issue Resolution & Final Prep

Weeks 10-12

Audit Simulation & Certification Readiness

Final takeaway

Packaging compliance in 2026 is not about adding more controls. It is about **preparing earlier, aligning systems, and reducing uncertainty.**

Quality Managers who treat packaging compliance as a core audit-readiness discipline:

- reduce audit effort
- improve predictability
- strengthen trust with customers and auditors

A practical next step

To support preparation, we've created a Packaging Audit-Readiness Checklist that helps Quality Managers review scope, documentation, traceability, and planning before audit dates are fixed.

Download the Packaging Audit-Readiness Checklist

A practical tool Quality Managers use to prepare packaging audits and reduce last-minute findings.

Packaging Audit-Readiness Checklist

Single & Multi-site Packaging Audit Review

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Purpose

Many Quality Managers use this **Packaging Audit-Readiness Checklist** not only before audits, but also as a **standardized review tool across sites** – to align scope, documentation, supplier controls, and planning logic before issues surface locally.

Typical completion time:

- **Single site:** 45-60 minutes
- **Multi-site / complex supply chains:** 1.5-2 hours

1 Packaging Scope & Responsibility

Confirm that packaging activities are clearly defined and auditable.

- ☐ All **primary and secondary packaging materials** are included in scope
- ☐ Responsibilities for **design, sourcing, approval, and change management** are defined
- ☐ Outsourced packaging processes are documented
- ☐ Scope aligns with food safety certification (e.g. BRCGS, IFS, FSSC)
- ☐ Packaging scope reflects **actual operations**, not legacy descriptions

Common audit issue: packaging scope is incomplete or outdated.

2 Food Contact Material (FCM) Compliance

Verify regulatory compliance and evidence.

- ☐ Declarations of Compliance (DoC) available for all food contact materials
- ☐ DoCs are **current**, complete, and signed
- ☐ Migration testing or suitability assessments documented where required
- ☐ Intended use conditions are clearly defined and respected
- ☐ Regulatory references (EU 1935/2004, relevant plastics regs) are documented

Audit signal: missing or outdated DoCs escalate quickly.

3 Supplier Approval & Monitoring

Packaging suppliers are often the weakest link.

- ☐ Packaging suppliers approved under a documented process
- ☐ Supplier certifications reviewed and up to date
- ☐ Change notifications from suppliers are formally managed
- ☐ Performance issues are tracked and addressed
- ☐ High-risk suppliers identified and reviewed more frequently

Audit signal: lack of documented supplier monitoring.

How Quality Managers Use This Checklist

Teams that apply this review report:

- fewer audit days on site
- fewer repeat non-conformances
- more predictable audit outcomes
- reduced stress during peak audit season

Need a second opinion?

If you'd like to review your packaging audit readiness with an expert, our specialists can help you interpret findings and plan next steps – especially ahead of peak audit season.

Request a readiness discussion

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To learn more about food safety certification services, visit **foodchainid.com**