Preventive Packaging Compliance Checklist (BRCGS Issue 7)

How Quality Managers reduce recurring non-conformities across sites

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Purpose

This checklist helps Quality Managers assess whether packaging compliance is managed as a **preventive, system-level discipline**, rather than a reactive response to audit findings.

Based on aggregated FoodChain ID audit experience across multi-site operations, recurring packaging non-conformities rarely result from missing controls. They more often reflect **controls that are fragmented, inconsistently applied, or not validated over time.**

Use this checklist to:

- **identify where packaging issues are recurring across sites**
- **evaluate whether controls reduce risk or simply respond to it**
- **align packaging compliance with broader food safety and supplier systems**

1 System Integration

Confirm that packaging compliance operates as part of one system.

- [ ] Packaging risks are embedded in HACCP and food safety systems
- [ ] Packaging controls align with supplier approval and CAPA processes
- [ ] Documentation structure is consistent across sites
- [ ] Corrective actions are applied system-wide
- [ ] Risk, control, and record logic is clearly traceable

Good vs. reactive system example

- **Reactive:** Packaging is managed through separate SOPs, with site-specific variations
- **Preventive:** Packaging controls are embedded within a unified food safety system used across all sites

Operational impact

- Reduced time reconciling documentation during audits
- More consistent audit outcomes across sites

KPI indicators

- Time required for auditors to follow system logic
- Number of repeat findings linked to documentation inconsistency

2 Preventive Control of Food Contact Materials (FCM)

Verify that FCM compliance is actively managed.

- [ ] Declarations of Compliance are reviewed on a defined schedule
- [ ] Migration testing is linked to risk and usage conditions
- [ ] Intended use is validated against actual operations
- [ ] Material changes trigger re-validation workflows
- [ ] Ownership of FCM compliance is clearly defined

Good vs. reactive system example

- **Reactive:** DoCs are updated only when requested during audits
- **Preventive:** FCM documentation is part of an ongoing validation cycle linked to supplier and product changes

Operational impact

- Reduced last-minute document collection
- Lower risk of major findings linked to outdated documentation

KPI indicators

- Percentage of FCM documentation reviewed within defined cycle
- Number of FCM-related non-conformities per audit cycle

How Quality Managers Use This Checklist

High-performing teams typically:

- apply this review between audit cycles, not only before audits
- use it to align packaging controls across sites and regions
- track improvements through defined KPIs linked to audit performance

This approach supports:

- fewer repeat non-conformities
- more predictable audit outcomes
- reduced time spent on reactive issue resolution

3 Supplier Control as a Preventive System

Assess whether supplier management prevents recurring issues.

- [ ] Supplier approval includes packaging-specific risk criteria
- [ ] Supplier performance is trended over time
- [ ] Change notifications trigger internal review workflows
- [ ] High-risk suppliers are subject to enhanced monitoring
- [ ] Documentation reflects current supplier status and scope

Good vs. reactive system example

- **Reactive:** Supplier issues addressed individually after non-conformance
- **Preventive:** Supplier performance trends trigger early intervention

Operational impact

- Fewer supplier-driven deviations
- Reduced escalation during audit periods

KPI indicators

- Supplier defect or non-conformance trends over time
- Frequency of supplier-related CAPAs

4 Change Management

Evaluate how packaging changes are controlled.

- [ ] All changes are risk-assessed before implementation
- [ ] Sustainability-driven changes are validated for food safety
- [ ] Cross-functional approval is required
- [ ] Documentation is updated before implementation
- [ ] Post-change performance is verified

Good vs. reactive system example

- **Reactive:** Changes implemented and validated later
- **Preventive:** Validation is a prerequisite for implementation

Operational impact

- Fewer unexpected audit findings
- Reduced rework linked to material or supplier changes

KPI indicators

- Percentage of changes validated before implementation
- Number of change-related non-conformities

5 Traceability Depth

Confirm traceability supports rapid verification.

- [ ] Packaging materials are traceable at batch or lot level
- [ ] Records link packaging to finished product lots
- [ ] Traceability includes suppliers and converters
- [ ] Retrieval time meets internal expectations
- [ ] Traceability is tested regularly

Good vs. reactive system example

- **Reactive:** Traceability exists but requires manual reconstruction
- **Preventive:** Traceability can be demonstrated quickly and consistently

Operational impact

- Faster audit response
- Reduced time spent retrieving documentation

KPI indicators

- Time required to complete traceability exercise
- Success rate of internal traceability tests

6 Operational Execution

Verify alignment between procedures and practice.

- [ ] Hygiene controls are consistently applied
- [ ] Handling procedures are followed in practice
- [ ] Staff understand packaging-related risks
- [ ] Observed practices align with documentation
- [ ] Deviations are captured and addressed

Good vs. reactive system example

- **Reactive:** Procedures exist but are inconsistently applied
- **Preventive:** Operational practices are regularly verified and reinforced

Operational impact

- Reduced minor findings escalating into major issues
- More stable audit performance

KPI indicators

- Internal audit findings related to operational deviation
- Training completion and effectiveness measures

7 CAPA Effectiveness

Assess whether corrective actions prevent recurrence.

- [ ] Root cause analysis addresses system-level issues
- [ ] CAPAs are tracked for recurrence
- [ ] Trends are reviewed at management level
- [ ] Actions are verified for effectiveness
- [ ] Repeat findings are reduced over time

Good vs. reactive system example

- **Reactive:** CAPAs close individual issues
- **Preventive:** CAPAs strengthen the system to prevent recurrence

Operational impact

- Reduced audit fatigue
- Fewer recurring non-conformities

KPI indicators

- CAPA closure time
- Rate of repeat findings across audit cycles

8 Continuous Control vs Audit Preparation

Evaluate whether compliance is continuous.

- [ ] Packaging systems are reviewed regularly
- [ ] Internal audits simulate external audit conditions
- [ ] Corrective actions are closed before audit cycles
- [ ] Audit planning is predictable
- [ ] Packaging is included in ongoing performance reviews

Good vs. reactive system example

- **Reactive:** Audit preparation starts shortly before audit
- **Preventive:** Systems are continuously maintained at audit-ready level

Operational impact

- Reduced pre-audit workload
- Less disruption during peak audit periods

KPI indicators

- Time spent on audit preparation
- Number of open actions at audit start

Final Preventive Readiness Check

If any section relies on:

- manual follow-up
- individual knowledge
- last-minute preparation

then the system is still operating reactively.

Preventive packaging compliance requires:

- integrated systems
- validated controls
- consistent execution across sites

Assess Your Packaging System Maturity

Many Quality Managers use this checklist as a starting point for:

- a cross-site packaging compliance review
- a structured audit gap analysis
- benchmarking against recurring audit patterns observed across global operations

If you want to go further, FoodChain ID teams can support:

- packaging compliance maturity assessments
- audit gap analysis aligned with BRCGS Issue 7
- cross-site standardization of packaging controls

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To learn how to reduce recurring non-conformities and strengthen packaging compliance, visit **foodchainid.com**