



PROCEDURE-TRACEABILITY AND MANAGEMENT OF WRAPPING AND PACKAGING MATERIAL

1. Introduction

This procedure relates to materials and articles which in their finished state are intended to be brought into contact with food. It describes the process of selection of suppliers, control of wrapping and packaging material as well as documents and record keeping.

For the purpose of this document, following definitions are used:

- "wrapping" means the placing of a foodstuff in a wrapper or container in direct contact with the foodstuff concerned, and the wrapper or container itself; sometimes called "primary packaging" (product contact materials such as plastic containers, tubs, form-fill-seal materials),
- "packaging" means the placing of one or more wrapped foodstuffs in a second container, and the latter container itself; sometimes called "secondary packaging" (non-product contact materials like cardboard outers)

2. Selection and management of wrapping suppliers

All wrapping materials shall be purchased from registered suppliers. This register shall be periodically audited according to an audit plan and taking into account the suppliers' previous performance (ability to meet specifications) and the hazards associated with the material.

3. Compliance with legislation

Wrapping material must be manufactured in compliance with good manufacturing practice and suitable for contact with food. It shall not:

- endanger human health;
- bring about an unacceptable change in the composition of food;
- bring about a deterioration in the organoleptic characteristics of food.

Materials and articles which in their finished state are intended to be brought into contact with food must comply with EU Regulation (EC) No 1935/2004¹. Appropriate documentation (provided by the

¹ Regulation (EC) No 1935/2004 of the European Parliament and of the Council of 27 October 2004 on materials and articles intended to come into contact with food and repealing Directives 80/590/EEC and 89/109/EEC, <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A02004R1935-20210327&qid=1645908996045>



supplier) shall be available to demonstrate such compliance. That documentation shall be made available to the competent authorities on demand.

When required by regulations, wrapping materials suppliers must carry out the global migration test provided for the type of material, and the specific migration tests for constituents. Guarantees must take into account the nature of the product to be packaged and the physical treatments (thermoforming) or chemical ones (disinfection) carried out by the manufacturer during the wrapping operations.

4. Incoming wrapping and packaging material inspection

On delivery, wrapping and packaging material shall undergo a visual inspection for outer cleanliness. It's good practice to keep records on incoming wrapping material inspection and detected deviations from specifications, if applicable.

Dirty items shall be rejected.

Wooden pallets which are not clean and damaged are to be excluded from the process flow.

5. Storage and handling of wrapping and packaging material

Wrapping and packaging material must be stored in clean and dry environment. Since these materials are not generally cleaned before use, particular attention must be paid during storage in warehouses/storage rooms and in production rooms, to avoid contamination by dirt, infestations and any contaminating agent.

Wooden pallets can be a source of microbiological contamination, particularly pallets used to deliver wrapping and raw materials, which are often quite dirty. They shall be kept out of processing areas and eventually kept in areas where the product is already packed and cannot be contaminated. In processing areas, pallets and trolleys made of cleanable materials (e.g. plastics, metals) or those intended for single-use shall be used.

6. Documents to be kept

Following documents should be kept:

- Register of producers and suppliers, including their registration or approval numbers;
- Specification documents for all raw materials and ingredients;
- Incoming material inspection procedure;
- Guarantees that the wrapping materials can be used without any food safety concerns for the intended product to be packaged and the physical treatments (thermoforming) or chemical treatments (disinfection) carried out by the manufacturer during the wrapping operations.



7. Minimum records to be kept

Following records should be kept:

- Incoming wrapping material
 - date of receiving the wrapping material
 - type (for which product is the wrapping material intended, e.g. 250 g Halloumi/Hellim)
 - producer
 - supplier (not necessary if the wrapping material is purchased directly from the producer)
 - quantity
 - producer's batch number
 - internal batch number (batch number that is assigned for the wrapping material, and which will be linked to the specific Halloumi/Hellim production), if applicable
- Results of sampling and analysis and of other tests carried out, if applicable

To facilitate and enhance the understanding of the expected traceability, following table represents a model that can be used to keep records on the incoming wrapping material. This example has to be seen as a source of inspiration and not necessary to be used as such.

RECORDS ON THE INCOMING WRAPPING MATERIAL							
DATE OF RECEIVING WRAPPING MATERIAL	PRODUCER	SUPPLIER	TYPE	QUANTITY	SUPPLIER'S BATCH NUMBER	INTERNAL BATCH NUMBER	REMARKS