

Global Good Manufacturing Practice (GMP) Solutions for Food Packaging and Other Food Contact Materials

GMPs ensure that materials and articles are being consistently produced and controlled to achieve compliance with applicable regulations and standards.



GMPs prevent contamination during the entire production lifecycle for food contact materials (FCMs) and food contact articles (FCAs) – from the raw materials selection phase through to storage and transportation. With sufficient risk assessment procedures, quality control measures, and documentation systems in place, companies can ensure that their products are fit for their intended use, not endangering human health, and not causing unacceptable changes in the composition or organoleptic properties of food.

Regulatory background

There are legally binding regulations in force in the EU, U.S., and China that specifically require companies to have GMPs in place for the production of materials and articles intended for food contact.

The GMP regulations are as follows:

- EU - European Commission **Regulation (EC) No. 2023/2006** "On good manufacturing practice for materials and articles intended to come into contact with food"
- USA - **FDA Title 21 CFR 174.5** "General provisions applicable to indirect food additives"
- China - National Standard for Food Safety **GB 31603-2015** "General Hygienic Specifications for Production of Food Contact Materials and Articles"

Compliance with (EC) No 2023/2006 is also required in Commission Regulation (EU) 2022/1616 on recycled plastic materials and articles intended to come into contact with foods (repealing Regulation (EC) No 282/2008).

Other countries such as Japan, and the countries under the Mercosur trade bloc, have regulatory frameworks in place for FCMs. These frameworks set general criteria around food contact packaging safety and often include requirements for GMPs.

A well-established quality system within a GMP program will address any material, product safety, or contamination-related risks or incidents. Companies should also consider implementing sufficient hygiene and housekeeping measures, establishing the proper documentation and labeling systems for traceability, conducting training for their personnel, and having an internal audit plan for GMP compliance.

Our GMP services

Food contact GMP regulations apply to different sectors and stages of the FCM supply chain, and the rules that govern each industry may vary across regions. While there is no standard available for implementing the regulatory requirements for GMPs for the FCM industry, Intertek Assuris experts apply an integrated approach and provide support as a 2nd party to help customers achieve GMP compliance.

Our approach covers multiple regions and is aligned with relevant industry guidelines and food safety standards for packaging. All of our services can be provided on-site or conducted remotely.

Our GMP assessment aims to identify gaps, if any, in the key GMP procedures for the production lifecycle – starting from raw material handling, to packaging, to finally storage of the product. It also includes recommendations on corrective actions to address any existing gaps.

Our Services Include:

- GMP Regulatory Training
- GMP Assessment
 - Preliminary Desktop Assessment (remote review of existing procedures and documentation)
 - 2nd Party Self-Assessment (remote/onsite systematic review of a facility's operations)
 - Assessment report containing recommendations to achieve compliance
 - Formal statement as final deliverable demonstrating status of GMP compliance

Related services:

- Consulting services for food contact regulatory compliance
- Design and implementation of testing required for food contact compliance (e.g., end-use testing, sensory testing, migration testing, NIAS screening)
- Educational training on legislation and food contact compliance

For more information

 foodcontact.assuris@intertek.com

 intertek.com/regulatory/food-contact