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RENEWABLE
RECYCLED
RESPONSIBLE
EUROPEAN

Good Manufacturing Practice Guideline for the Manufacture of Paper and Board for Food Contact

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Anna Papagrigoraki
Sustainability Director

About Cepi

Represents in Brussels
490 pulp, paper and board producing companies
885 mills across Europe of which **139** biorefineries
180000 people employed directly
18 member countries

Engaged in international fora (UN, FAO, WTO)
to defend our **21.7 %** share of global production

Working across the value chains –
from forest owners to converters

Chair: **Ilkka Hämälä, Metsä Group**

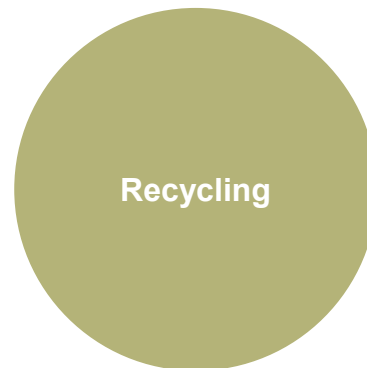A staff of **24** industry, policy and public affairs experts
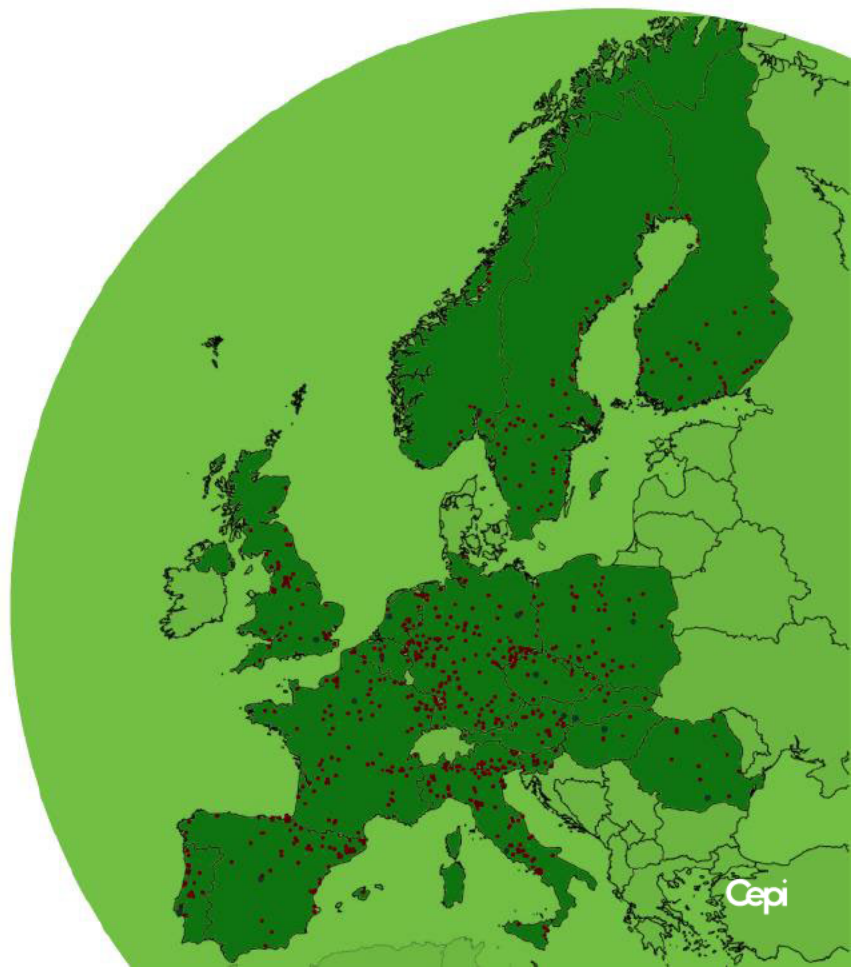
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About Cepi

We deploy our agenda in 6 focus areas
Outline of CEPI activity areas 2020-2029

- ETS, energy policy, renewables, 2050 climate strategy
- Food contact, sustainability performance, REACH
- Land use and forestry, certification, forest-based industries joint strategy
- Production and statistics reports, Industrial policy, international trade, transport
- Circular economy, recyclability
- Bioeconomy strategy, R&D programmes, funding, skills agenda

Energy & climate change

Environment health & safety

Forestry

Trade & industrial affairs

Recycling

Bioeconomy & social affairs

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About Cepi

We are renewable, and sourced, made and recycled in Europe, a responsible industry towards the environment, its customers and workers

Transforming pulp wood into cellulose and bio-based products, 86% of our raw materials are sourced from within the European Union and 78% of the wood comes from certified forests

Keeping the fibres in the loop, 71.4% recycling rate of EU paper-based products

Producing
Pulp & fibres
Nano-cellulose
Bio-energy
Bio-chemicals
Print & graphic paper
Packaging solutions
Hygiene and tissues
Specialty papers

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1.What are the Good Manufacturing Practices (GMP)

GMP is a legal, mandatory requirement to guarantee safety of Food Contact Materials of Regulation 1935/2004.

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Regulation 1935/2004 – the origin of the GMP being a legal compulsory requirement

Article 3
General requirements

1. Materials and articles, including active and intelligent materials and articles, **shall be manufactured in compliance with <u>good manufacturing practice</u>** so that, under normal or foreseeable conditions of use, …..

The GMP is a legal requirement for those who are producing materials and/or articles intended to be used in contact with food.

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Regulation 2023/2006

All business operators should operate **an effective quality management of their manufacturing operations for safety of the consumers** which should be adapted to their position in the supply chain.

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GMP belongs to the same family as the Quality Assurance System Standards

However the QAS:

* **Are voluntary**

* **Do not cover all aspects relevant to compliance   of GMP systems to 2023/2006 and 1935/2004**

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Cepi   2. Cepi GMP guidelines

2. Why have a Cepi GMP Guideline

GOOD MANUFACTURING PRACTICE GUIDELINE
FOR THE MANUFACTURE OF PAPER AND BOARD FOR FOOD CONTACT

GMP Regulation applies to all types of food contact materials and articles without going into their technical specificities.

The Cepi guideline provides advice on implementation of a GMP system specific to paper and board manufacturing in order to comply with the Regulation:

- A cross-reference table shows how the different sections of the GMP Regulation relate to the sections of the Guideline.
- The Cepi GMP and Food Contact Guidelines provide information on specific requirements set out in the FCM regulation on labelling, declaration of compliance and traceability.
- Complexity and scope of GMP system can be adjusted to the size of the business. Cepi GMP is therefore also valid for SMEs.

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2. Purpose of the Cepi GMP Guideline

GOOD MANUFACTURING PRACTICE GUIDELINE FOR THE MANUFACTURE OF PAPER AND BOARD FOR FOOD CONTACT

The Guideline contains details of the concepts and methodologies required to ensure compliance with Commission Regulation (EC) No 2023/2006

In addition, it covers the implementation of risk assessment within the GMP quality assurance system.

NI: The contents of this document are **advisory and not legally binding. This is a guideline intended to help the paper and board industry demonstrate compliance to EU GMP Regulation.**

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2. The Cepi GMP Guideline 2023

GOOD MANUFACTURING
PRACTICE GUIDELINE
FOR THE MANUFACTURE
OF PAPER AND BOARD
FOR FOOD CONTACT

This document is the first update of the Cepi GMP guidance published in 2010 and benefits from the experience gathered by the paper and board industry with GMP systems since that time and the detailed input from the Cepi food contact expert group.

The aims of the Cepi GMP Guideline :

- Roadmap for paper and board manufacturers to implement a GMP system for food contact materials and articles
- Guidance/Checklist for the auditors of the aforementioned system

To be read together with the Food Contact Guidelines for the Compliance of Paper & Board Materials and Articles

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2. The scope

GOOD MANUFACTURING PRACTICE GUIDELINE
FOR THE MANUFACTURE OF PAPER AND BOARD FOR FOOD CONTACT

Focuses on the manufacturing of paper, board and tissue paper intended for food contact.

It does NOT cover downstream operations outside the responsibility of the paper and board manufacturer.

Assumes the existence of a documented quality management system in place based on the principles of a recognised system such as ISO9001 or equivalent.

Covers the entire production process –see Annex 1

Any measure relevant to the implementation and maintenance of an effective GMP system should be derived from the risk-assessment process and take into account the intended use of paper and board.

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2. The structure

Two main operational parts:

1. Sections 4-7: Description of the basic requirements of the GMP Regulation and some of the FCM Regulation and how they are interpreted and applied during paper production.

2. Section 8: List of detailed actions which interpret the requirements for the paper and board manufacturing to achieve compliance of the GMP regulation.

This done via an indicative checklist for auditing purposes to be adapted according to the specificities of the paper mill e.g. starting materials.

GOOD MANUFACTURING PRACTICE GUIDELINE
FOR THE MANUFACTURE OF PAPER AND BOARD FOR FOOD CONTACT

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2. Activities covered – Annex 1
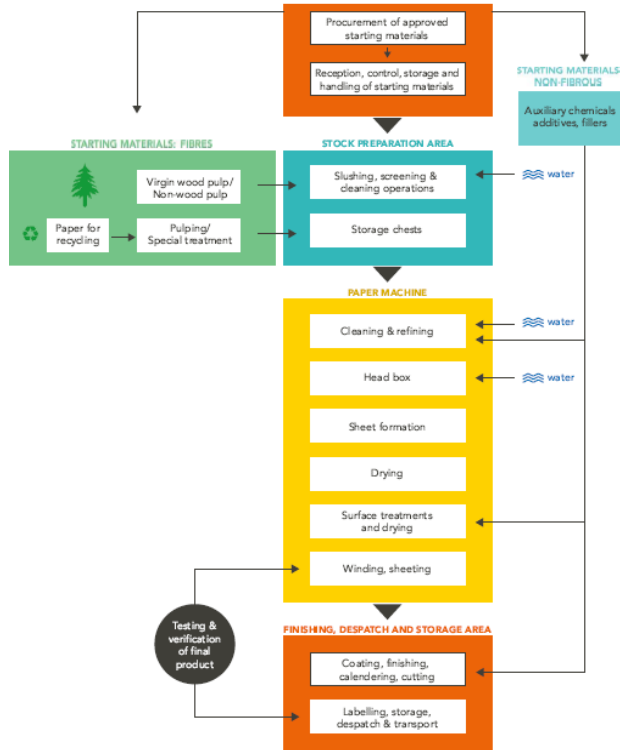
In addition, all activities that are subcontracted to third and/or external parties (e.g. storage/handling of final paper and board, despatch and transport, maintenance, etc.)

2. Indicative checklist – what does it cover

1. Implementation of a Quality Management System
2. Management responsibility and Organisation
3. Adequacy, knowledge and skills of personnel. Training
4. Risk analysis, Risk assessment, Risk Management
5. Organisation of the premises and equipment – Hygiene and housekeeping
6. Personal hygiene
7. Selection of suppliers – Compliance of starting materials
8. Conformity to pre-established instructions and procedures
9. Storage, shipment, transport and delivery
10. Quality control along the process – Control and testing of finished products
11. Monitoring of GMP implementation and achievement – auditing and management of changes
12. Documentation
13. Labelling
14. Declaration of Compliance
15. Traceabilty

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2. Indicative checklist – a snapshot – relevant to FCM revision

Documentation		
Arrangements should be implemented to produce documentation for internal and external evaluation of the effectiveness of the GMP system.	6	Continuous production of documentation is not needed, and reports could, for example, be produced in retrospect from computer records. Examples of the required documentation include: • results of risk assessment; • changes in supply and suppliers; • starting material usage; • manufacturing and traceability documentation (mainly machine logs) including documentation of traceability tests; • occurrences of deviation from specification and corrective measures (including changes required by new requirements from legislators); • results of testing within the quality assurance system and all management system (as ISO 9001 or equivalent) documentation.
Labelling		
Labelling should be aligned with the requirements of the Framework Regulation. A link between traceability information and the labelling process should exist and be demonstrated.	7.2	
Declaration of Compliance		
Declaration of compliance (DoC) should be delivered to downstream business operators.	7.3	See more information on the content of the DoC and the relevant supporting documentation in the Food Contact Guidelines.
Traceability		
The correct operation of the existing traceability system should be tested (once a year is recommended).	7.4	See further guidance in the Food Contact Guidelines.

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