

## FAQs from the Field

*Our Ecolab Technical Customer Service line receives hundreds of calls a day from customers seeking help on a wide variety of issues including the GFSI recognized programs like BRC Food, SQF and FSSC 22000. This section of the newsletter will address those questions on a continual basis.*

**Q:** During my SQF certification audit, the auditor asked me many questions about the safety of my primary packaging materials. What exactly do I need to have on-hand in order to comply with 4.3.3.3?

***What kind of documentation do I need to have for my primary packaging materials?***

**A:** This is the information that a food processor should request from his/her primary food contact packaging manufacturer in order to comply with the requirement:

1. Continuing Letter of Guarantee (LoG) that states the packaging materials meet US regulatory requirements (FDA and/or USDA) by stating:
  - a. Raw materials used in the manufacture of the packaging materials meet FDA's requirements for food contact applications and are approved for the food type and condition of use limitations as noted in the LOG.
  - b. Optional: "Condition of Use Statement/Condition of Use Limitations" refers to testing that is conducted by some packaging manufacturers which speaks to its performance (e.g., sealing properties) in common uses of the materials.
2. Property Sheet /Technical Data Sheet for the material: Recommended. Provides the specifications of the packaging material such as moisture, vapor, transmission rate, standard application and other properties as appropriate.
3. If appropriate to the application, a Certificate of Analysis can be obtained which confirms the presence of materials responsible for key attributes (e.g., presence of an oxygen scavenging resin or additive if this is a key attribute of the material).

Furthermore, it is your facility's responsibility to confirm the functionality of the packaging material in your processing application(s).

FDA's food contact regulations require manufacturers of resins and additives to meet the requirements of 21 CFR Parts 170-199, or have an effective Food Contact Notification. Manufacturers of primary food contact packaging materials must ensure their suppliers comply.

In the US, it is commonly accepted practice that packaging manufacturers not test for the absence of chemical migration, rather they are required to have documentation on file stating that the raw material (and its constituents) complies with FDA's regulations and meets all necessary specifications as noted in the regulations. It is this assurance which allows a packaging manufacturer to draft a Letter of Continuing Guarantee for its customers which states the material meets FDA's / USDA's requirements.

In EU, manufacturers of packaging materials are sometimes required to test for certain monomers and/or additives to ensure they meet all specified migration limits as noted in the Plastics Directive (as appropriate, some do not have limits). If there is a question as to whether the level may be exceeded, then the company will conduct the migration testing.

*Ecolab would like to thank Sealed Air Corporation for its assistance with this document.*

## What Is Safe Quality Food–SQF?

SQF is a food safety and quality management program for your entire food supply chain which lays out the requirements that a food supplier must follow to control both the safety *and* quality of a product. The SQF 2000 Code is one of the six food safety management programs recognized by the Global Food Safety Initiative (GFSI).

For more information on BRC, HACCP, GFSI, SQF, food safety training services and consulting services, contact us via e-mail at [FoodSafety@Ecolab.com](mailto:FoodSafety@Ecolab.com), or call 866.EcoSur1, Ext 0 or visit our website at [www.ecosure.com](http://www.ecosure.com).

To remove your name from our mailing list, please e-mail [FoodSafety@Ecolab.com](mailto:FoodSafety@Ecolab.com).

## EcoSure Can Help

- ▲ We offer monthly training courses in key locations (Calif., N.J., Minn., Ill., N.C.)
- ▲ We can conduct onsite training for large groups at your location
- ▲ We offer SQF, BRC Food, FSSC22000, GFSI and HACCP training (accredited by the International HACCP Alliance)
- ▲ Our SQF consultants can help develop, implement and verify your SQF and supporting programs, and help you prepare for an audit

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## Our EcoSure SQF Expert



EcoSure's SQF program is managed and courses taught by Dr. Tatiana Lorca, the former technical manager for the SQF Institute. Dr. Lorca has years of experience developing and delivering food safety training programs around the world. She is a registered SQF trainer and consultant. Dr. Lorca is also an experienced trainer and consultant for other programs such as BRC, FSSC 22000, HACCP and Sanitation.

