

PART TWO

12. WRAPPING AND PACKAGING

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12.1 WHY IS WRAPPING AND PACKAGING IMPORTANT?

Unprotected or poorly wrapped and/or packaged food will be vulnerable to physical damage as well as microbiological contamination and cross-contamination. Use of the wrong wrapping materials may lead to chemical contamination. Unhygienic storage and assembly of wrapping and packaging can contaminate the materials and therefore the food. Procedures are needed to prevent or minimise the risk of such hazards causing illness to consumers.

For example:

- Poor quality wrapping materials can tear and expose food to contamination.
- Inappropriate wrapping materials may contain chemicals that can taint food.
- Poor storage conditions can lead to deterioration of wrapping and/or packaging and contamination by dirt and pests.
- Cardboard cartons can absorb microbiological contamination and be a source of dust and paper fragments so need to be lined before use.
- Inadequate cleaning of reusable containers will allow cross-contamination between product batches.
- Wrapping and packaging can control microbial spoilage by, for example, packaging meat in protective atmospheres using varying the levels of oxygen (O₂), carbon dioxide (CO₂) and nitrogen (N₂).

12.2 WHAT ARE THE LEGAL REQUIREMENTS FOR WRAPPING & PACKAGING?**12.2.1 WHICH OPERATIONS DOES THE LAW APPLY TO?**

Operations	Relevant Section of 12.2.2 below
Red Meat Slaughter	A
White Meat Slaughter	A
Approved Farm Slaughter	A
Farmed Game Handling	A
Wild Game Handling	A
Meat Cutting and Production of Meat Product, Mince, Meat Preparations and MSM	A
Edible By-Products	A

12.2.2 WHAT ARE THE OPERATOR'S LEGAL OBLIGATIONS?**A. WRAPPING AND PACKAGING OF FOODSTUFFS**

- *'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.*
- *'Packaging' means the placing of one or more wrapped foodstuffs in a second container, and the second container itself.*

852/2004 Article 2 (j) & (k)

1. All articles, fittings and equipment with which food comes into contact are ... with the exception of non-returnable containers and packaging, [to] be so constructed, be of such materials and be kept in such good order, repair and condition as to enable them to be kept clean and, where necessary, to be disinfected.

*852/2004 Annex II **Equipment**: Chapter V point 1(c)*

2. Material used for wrapping and packaging is not to be a source of contamination.
3. Wrapping materials are to be stored in such a manner that they are not exposed to a risk of contamination.
4. Wrapping and packaging operations are to be carried out so as to avoid contamination of the products. Where appropriate, and in particular in the case of cans and glass jars,

the integrity of the container's construction and its cleanliness is to be assured.

5. Wrapping and packaging material re-used for foodstuffs is to be easy to clean and, where necessary, to disinfect.

*852/2004 Annex II **Wrapping & Packaging**: Chapter X points 1 – 4*

6. At all stages of production, processing and distribution, food is to be protected against any contamination likely to render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state.

7. Adequate procedures are to be in place to control pests.

8. Food businesses manufacturing, handling and wrapping processed foodstuffs are to have suitable rooms; large enough for the separate storage of raw materials from processed material

*852/2004 Annex II **Foodstuffs**: Chapter IX points 3, 4, 5*

9. To avoid contaminating meat, [red meat slaughterhouses] must: (c) ensure separation in space or time of the following operations: (vi) packaging offal.

*853/2004 Annex III **Slaughterhouses**: Section I Chapter II point 2*

10. Exposed meat must be stored ... separately from packaged meat, unless stored ... at different times or in such a way that the packaging material and the manner of storage ... cannot be a source of contamination for the meat.

*853/2004 Annex III **Slaughterhouses**: Section I Chapter VII point 5 & Section II Chapter II point 4*

11. Have rooms for the separate storage of packaged meat and exposed meat and products, unless stored at different times or in such a way that the packaging material and the manner of storage cannot be a source of the contamination for the meat.

*853/2004 **Annex III: Cutting**: Section I Chapter III & Section II Chapter III; / **Farmed Game**:*

*Section III points 1 & 2; / **Production Establishments**: Section V Chapter I &: Section VI point 2*

12.2.3 WHAT ARE THE OFFICIAL CONTROL REQUIREMENTS?

The competent authority shall carry out official controls to verify food business operators' compliance with good hygiene practices.

854/2004 Article 4(2)(a)

12.3 HOW MAY OPERATOR'S DEMONSTRATE COMPLIANCE?

Food Business Operators can demonstrate compliance with their legal obligations for wrapping and packaging of foodstuffs on an ongoing basis by providing evidence, including appropriate documentation, that:

- New, rebuilt, altered, or refurbished premises are sited, designed, laid out, constructed, equipped to allow wrapping and packaging to be carried out hygienically.
- Procedures exist to wrap and package food effectively by:
 - Selecting suitable food wrapping, packaging and food containers that provide protection from contamination and physical damage.
 - Providing hygienic and pest-free storage for wrapping and packaging materials.
 - Arranging for wrapping and packaging operations to be carried out under hygienic conditions that are separated in time or space from other meat operations.
 - Ensuring that wrapping materials are clean and that only containers that are clean and disinfected are re-used.
- Arrangements exist to maintain and monitor wrapping and packaging procedures and take corrective action if there is a failure.

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12.3.1 DESIGN AND LAYOUT

GUIDE TO COMPLIANCE	ADVICE FOR OPERATORS
<i>Design and layout</i>	<i>Design and layout</i>
<ul style="list-style-type: none"> There is adequate storage for wrapping materials, separate storage (in time or space) for packaged meat/ exposed meat and its products, separate storage (in time or space) for raw materials/ processed material and in red meat slaughterhouses separation in space or time of offal packaging operations.. <p>A3, A8, A9, A10, A11</p>	<p><i>Consider the adequacy of the space requirements in the design and construction of premises or when buildings are rebuilt, altered or refurbished, in relation to throughput,</i></p> <ul style="list-style-type: none"> <i>for storing wrapping and packaging materials;</i> <i>for assembling wrapping/packaging before use;</i> <i>for the wrapping and packaging of meat (including offal) and for its products; and</i> <i>the separate storage of packaged and exposed meat and its products.</i> <p><i>See Chapter 1 (Design & Facilities).</i></p>

12.3.2 WRAPPING AND PACKAGING

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<i>Training & instruction</i>	<i>Training & instruction</i>
<ul style="list-style-type: none"> Food handling staff are supervised and receive instruction or training in food hygiene matters commensurate with their work activity. <p>852/2004 Annex II Chapter XII point 1</p>	<p><i>Instruct staff about the food safety hazards associated with inadequate and unhygienic storage and use of wrapping and packaging materials, the need to follow instructions and to report failing control measures promptly. Supervise as necessary and issue reminders to staff if lapses occur. See Chapter 6 (Training).</i></p> <p>Records – <i>keep accurate, dated individual training records to show what instruction/training has been given.</i></p>
<i>Wrapping & Packaging materials</i>	<i>Wrapping & Packaging materials</i>
<ul style="list-style-type: none"> Material used for wrapping or 	<i>Use only wrapping materials that are suitable for</i>

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packaging is not a source of contamination.

A2'

'Wrapping' is the placing of a foodstuff in a wrapper or container in direct contact with the foodstuff concerned, and the wrapper or container itself.

'Packaging' is the placing of one or more wrapped foodstuffs in a second container, and the second container itself.

852/2004 Article 2j, 2k

- The integrity of the container's construction and its cleanliness is assured.

A4

contact with food and that do not adversely effect the taste and smell of the product. Wrapping material must protect the meat during storage and handling. Polythene is the most common wrapping material although other materials may be suitable.

If materials meet these requirements of wrapping and are strong enough they may serve as both wrapping and packaging, for example:

- 'Polyboxes' – cardboard cartons with a plastic inner coating.
- Vacuum packaging such as rigid or flexible containers from which the majority of air can be removed.
- Modified atmosphere packages (MAP) in which a combination of gases such as oxygen, carbon dioxide and nitrogen are introduced into the package at the time of closure.

Food can be placed directly into these containers without pre-wrapping. However, it is common for vacuum or MAP packaged products to be transported in plastic re-usable trays.

Receipt of inadequately wrapped/packaged meat – if received, decide whether the meat is fit or unfit and take action, which may include:

- Trimming of visible contamination;
- Disposal as a by-product;
- Return to the originating premises in suitable packaging.

Reusable containers

- The container's cleanliness is assured.
- A4**
- Wrapping and packaging materials re-used for foodstuffs are easy to clean

Reusable containers

Only wrapping and packaging containers that are capable of being cleaned (e.g. hard plastic) may be reused for foodstuffs and then only if they are cleaned and disinfected before reuse.

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and, where necessary, to disinfect.	
A5	
Storage of materials	Storage of materials
<ul style="list-style-type: none"> Wrapping materials are stored in such a way that they are not contaminated. 	<p><i>Store wrapping and packaging materials off the floor and keep wrapping free from dust and other contamination.</i></p> <p>Pest control – wrapping and packaging materials can provide shelter and nesting material for pests, so make sure stores are kept pest free. See Chapter 5 (Pest Control).</p>
A3	
<ul style="list-style-type: none"> Adequate pest control procedures are in place. 	
A7	
Separation	Separation
<ul style="list-style-type: none"> Packaged meat and exposed meat are stored separately (in time or space) so that the packaging material and storage arrangements are not a source of contamination. 	<p><i>To minimise the risk of contamination of unwrapped meat from packaging or from packaged meat, store them in separate rooms, or in the same room at a different time or at the same time with either a permanent barrier between them that can be cleaned and disinfected or by using an appropriately placed polythene covering to prevent air-borne cross-contamination.</i></p>
A10, A11	
<ul style="list-style-type: none"> Businesses manufacturing, handling and wrapping processed foodstuffs have large enough rooms for the separate storage of raw materials from processed material. 	
A8	
Packing Operations	Packing Operations
<ul style="list-style-type: none"> Wrapping and packaging operations are to be carried out so as to avoid contamination of the products. 	<p><i>Assemble boxes under hygienic conditions as close to the time of use as possible, and organise the flow of packaging into areas where exposed meat is present to limit the opportunity for cross-contamination.</i></p> <p><i>If lined or coated boxes are assembled and stored for later use, stack them on their sides or opening-to-</i></p>
A4	
<ul style="list-style-type: none"> At all stages of production, processing and distribution, food is to be protected against any contamination likely to 	

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render the food unfit for human consumption, injurious to health or contaminated in such a way that it would be unreasonable to expect it to be consumed in that state.

A6

opening, so that the wrapping (e.g. polythene liners) inside the boxes is not at risk of contamination.

To avoid contamination of unwrapped meat during packing, the meat and staff handling the meat should touch only the inner, lined or coated surfaces where the meat is being placed, and not the outer surfaces of the packaging. Otherwise, staff handling unwrapped meat and then handling packaging materials (or vice versa) should wash their hands between the two operations.

12.3.4 MAINTAINING AND MONITORING OF WRAPPING & PACKAGING

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Operator Responsibilities

Operator Responsibilities

- The operator is responsible for food safety in the food business.

852/2004 Article 1 point 1a

Operator Responsibility includes maintaining and monitoring the company's wrapping and packaging procedures and taking corrective action if there is a failure.

Delegation – responsibility for the company's wrapping and packaging procedures and its monitoring may be delegated to a nominated person to whom problems are reported, and who has sufficient authority to ensure that corrective action is taken when necessary.

Monitoring – there should be periodic checks that company wrapping and packaging procedures are being followed regarding quality of materials, storage of materials, hygienic wrapping and packaging and reporting of problems.

Frequency of monitoring - this will depend on the likelihood of a problem being found. Once a month may be sufficient with experienced staff

and where procedures are unchanged. The work of new or temporary people who are less familiar with the procedures may need to be monitored more frequently.

Records – *keep an accurate, dated account (e.g. in an operations notebook) of the date and result of each periodic monitoring check and of any corrective action taken.*

Corrective action - *take action when evidence of failure of wrapping and packaging procedures is identified. Such action may include:*

- *Dealing with any product that may be contaminated;*
- *Establishing the underlying cause and what needs to be done to prevent similar incidents in the future; and*
- *Improving staff instructions and training.*