PRCA
PAPER RECEIPTS
CONVERTING ASSOCIATION

Good Manufacturing Practices

Final Version

Adopted March 18, 2020

Contents

1 Scope

1.1 This Good Manufacturing Practices (GMP) document was developed by the Paper Receipts Converting Association (PRCA). PRCA member compliance with the GMP is intended to provide PRCA members' customers with assurance that the products they purchase from PRCA members meet manufacturing and labeling requirements set forth herein.

1.2 The GMP is an information and management tool with methods that member converters agree to adopt.

1.3 Member converters shall employ effective quality management systems. These Good Manufacturing Practices should be part of each converter's specification processes and document management system.

2 Objectives

2.1 This document of GMP determines the minimum requirements for good manufacturing practices, the need for an effective quality assurance system and the establishment of quality control procedures.

2.2 The receipt industry in North America is supplied by global converters. PRCA wants to bring integrity to the industry and provide transparency with respect to product contents to North American receipt customers.

2.3 Included in this transparency is compliance with the regulated paper chemistry, where appropriate, such as California's Proposition 65, as well as state and local regulations.

2.4 GMP "design for compliance" is the PRCA's description of the best approach to consistent and repeatable quality standards. The choice of raw materials and production methods must be such that products match entirely with the goal of the GMP.

2.5 Traceability and certification of raw materials are also critical. Certified compliance with applicable legal requirements is required for raw materials.

3 Terminology and Abbreviations

BPA Free Paper – A paper which contains no more than 20 parts per million (PPM) of BPA down to non-detectable levels. However, each municipality or state may have its own definition of BPA free thermal paper as defined by limits on PPM allowed.

CONEG - Coalition of Northeastern Governors

ECT – Edge Crush Test

FDA – US Food and Drug Administration

GMP – Good Manufacturing Practices

OD- Outside Diameter

OSHA - Occupational Safety and Health Administration

Phenol Free Paper – A paper made without BPA, BPS and other phenol derivatives

PPM – Parts per Million

PRCA – Paper Receipts Converting Association

Prop 65 – California Proposition 65 - The California Safe Drinking Water and Toxic Enforcement Act of 1986

QMS – Quality Management System

REACH – Registration, Evaluation, Authorization and Restriction of Chemicals

RoHS - Restriction of Hazardous Substances Directive

UOM – Unit of Measure

4 Management Commitment and Responsibility

4.1 The member converter will commit to develop and implement a Quality Management System (QMS) and to continually improve its effectiveness by:

- 4.1.1 Being committed to employee safety as a number one priority
- 4.1.2 Communicating to its employees the importance of meeting customer expectations as well as statutory and regulatory requirements
- 4.1.3 Conducting management reviews to meet the needs of the customer
- 4.1.4 Ensuring the availability of resources and competencies of personnel
- 4.1.5 Creating and maintaining a detailed specification system
- 4.1.6 Ensuring vendor compliance with documented purchasing requirements
- 4.1.7 Committing to a continuous improvement system and culture

5 Regulatory Compliance

5.1 PRCA Member operations shall comply with all current and future applicable global, federal, state and local regulatory and legislative requirements. Receipt products shall, at a minimum, meet all regulatory and legislative requirements for the market(s) in which they will be used, including without limitation all applicable U.S. Food and Drug Administration, Occupational Safety and Health Administration, Environmental Protection Agency, Consumer Product Safety Improvement Act, CONEG, and European Union REACH and RoHS regulations.

6 Purchasing

6.1 Raw materials should be purchased from suppliers, including mills and brokers, with QA systems compatible with the member converter's quality system. Suppliers should warrant that their manufacture and supply of raw materials will comply with all applicable legal requirements.

6.2 In any assessment the converter can use information provided by its supplier regarding the compliance of raw materials. Converters should seek confirmation from their suppliers of:

- 6.2.1 Compliance with existing specifications
- 6.2.2 Compliance with all applicable legal requirements
- 6.2.3 Obligation to immediately inform the converter of any raw material change
- 6.2.4 No contamination during storage or delivery
- 6.2.5 Traceability of composition and production method and component country(ies) of origin.

6.3 Mills can provide certifications or brokers may provide certification from mills. If brokers cannot provide mill certifications, PRCA member is responsible for third-party testing. PRCA will provide a list of labs for the convenience of members. However, members can use any third-party lab at their discretion.

7 Packaging and Labeling

7.1 Packaging

- 7.1.1 The master or outer carton for each item, minimum ECT 32, unless otherwise specified by customer, must be adequate to protect the paper rolls under normal shipping and handling conditions. The carton must also be appropriately sized and packaged to prevent significant roll movement within the carton.
- 7.1.2 The carton sealing tape shall be adequate to protect the paper rolls under normal shipping and handling conditions.

7.2 Labeling

7.2.1 The carton label shall clearly and accurately define the contents of the carton. At a minimum, the carton label should define the item number, the length of the roll or outside diameter (OD) as applicable, the paper type, the number of rolls per carton and the job or lot number. Other optional elements of the label could be UPC code or other type of barcode, country of conversion, unit of measure (UOM), and recommended storage conditions.

8 Storage and Handling

8.1 PRCA members shall have policies and procedures regarding the storage and handling of raw materials and finished goods to ensure that product integrity is maintained.

8.2 Members shall ensure that raw materials and finished goods that exceed shelf life are quarantined and dispositioned.

8.3 Members should ensure that production and storage sites are adequately designed and kept in clean, dry and organized condition.

8.4 PRCA members shall utilize paper with a minimum stated storage life of two years and a minimum archival life of five years. Paper should generally be stored in the original mill wrapper until conversion to protect against environmental elements.

9 Quality Assurance and In-Process Inspection

9.1. PRCA members will assure that:

9.1.1. All measuring equipment is calibrated and adjusted as necessary at specific intervals to ensure product conformance to customer requirements.

9.1.2. The job set up is verified via an effective quality assurance system.

9.1.3. Footage checks are performed at determined frequency by unrolling and measuring the rolls to ensure that specified roll footage is maintained at a tolerance to not exceed the greater of +/- 1 foot or +/- 1%.

9.1.4. When the customer has specified OD, the OD is maintained at a tolerance not to exceed+/- 2%.

10 Traceability and Record Retention

10.1 Traceability is a key component in assuring customers that processes are under control. Traceability makes it possible to provide proof that the correct paper has been supplied to a customer.

10.2 Processes need to be in place which provide a chain of custody from receipt of paper from the supplier through production processes and finally to the customer.

10.3 Record retention is necessary to make traceability effective. Record retention policies should outline the sources of the documents to be retained, the responsible parties to keep records, the location and method of retention, and the duration of retention.

11 Preventive Maintenance

11.1 Members shall have a system of planned or preventive maintenance in place covering all critical equipment.

12 Facility Security

12.1 Member converters shall establish facility security procedures and processes and then train employees appropriately.

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