



Audit Report

Global Standard for Packaging and Packaging Materials Issue 4 : February 2011

Company Name:	Cumberland Packaging Limited	Site name:	Shoeburyness
Audit Category:	Low Hygiene Risk	BRC Site Code:	4477975

Audit Result:	CERTIFICATED	Audit Grade:	A
		Audit Frequency :	12 months

A or B = 12 months
C = 6 months

Audit Start Date:	2012-01-04	Audit Finish Date:	2012-01-04
Re-audit Due Date:	2013-01-06	Previous Audit Date:	2011-01-13

Auditor Number (one only : team leader)	Auditor Names
110020	Anis Munshi

Scope Details

Packaging Field:

02 - Paper

04 - Plastics

Select a packaging field

Select a packaging field

Scope of Audit: Manufacture of corrugated boxes and polystyrene packaging

Exclusions from Scope: None

Products in production at the time of the audit:

Corrugated cartons and fitments, polystyrene fillers

Company Profile

The Company was established in 1985 and produces corrugated and polystyrene packaging products for a variety of industry sectors including food and pharmaceutical uses. There is no particular bias of any industry sector.

The site has a case maker with printing stations, crease and cutting machinery as well as the necessary ancillary equipment. The Company employs around 50 people who work a one shift system, with extended hours as required. The site holds Investors in People and is an NVQ approved training centre for fibreboard conversion level 2, and also holds an award issued by the Sheet Plant Association.

The plant including production machinery and ancillaries is well maintained.

QA International Certification Ltd, Dudley Court, Dudley Road, Darlington, Co.Durham, DL1 4GG		Auditor: Anis Munshi	
P027 Issue: 4	Page 1 of 15	Report No: UK/BRC/304	Global Standard for Packaging and Packaging Materials – Issue 4

Audit Report

Detail of Non Conformities

Summary of Non-Conformity Raised

	No.		No.
Critical non-conformity	0	Major non-conformity	0
Major against statement of intent of a Fundamental clause	0	Minor non-conformity	8

Critical

No.	Requirement ref.	Detail of Non-Conformity	Proposed audit date	Reviewed by

Major against SOI of a Fundamental Clause

No.	Requirement ref.	Detail of Non-Conformity	Proposed audit date	Reviewed by

Major

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Date signed off	Reviewed by

Audit Report

Minor

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Date signed off	Reviewed by
1	1.1.1	The Quality Policy in place refers to Global Standard for Packaging and Packaging Materials Issue 3	The Quality Policy has been amended to refer to Global Standard for Packaging and Packaging Materials Issue 4. The cause can be put down to oversight	A PDF referring to the issue 4 provided	2012-02-09	AMunshi
2	2.2.4	Process flow does not include customer returns	The process did include customer returns, but the company representative was unable to find it during the audit.	Ref CPL Hygiene	2012-02-06	AMunshi
3	4.4.1	A risk assessment has been carried out to address security issues but there is no procedure in place	A procedure has been implemented ref risk assessment methodology and assessment report	Ref Excel file	2012-02-09	AMunshi
4	4.7.3	Temporary engineering seen on Topra MD 1224 machine where a card was sellotaped to the exit point to act as a buffer	Temporary engineering has been removed and a permanent solution put in its place. Root cause was down to keeping up with production orders	Ref Jpeg DSCF0910	2012-02-06	AMunshi
5	5.2.2	Flexographic printing plates seen near Topra MD 1224 with no identification on them	Plates are placed inside wallets with identification Root cause: the plates in question are left near the machine	Ref jpeg DSCF0911	2012-02-06	AMunshi
6	5.8.1.2	Some of the strip lights in the new building are not covered	New lights have been ordered and are waiting delivery. Root cause: company is in the process of installing new lights (completed in new part of building), they are just waiting for more lights to be delivered to complete the job	Newly installed lights seen on-site	2012-02-06	AMunshi
7	6.3.4	Drinking of water is permitted near equipment from spill proof containers but is not documented	Sign has been placed indicating where water is permitted	Word document attached	2012-02-06	AMunshi

Audit Report

Company Details

Company Name : Cumberland Packaging Limited	
Site Name : Shoeburyness	
Address : Unit 2, Bay 6 Campfield Road, Shoeburyness, Southend on Sea, Essex	
Country : UK	Postcode : SS3 9BX
Telephone : 01702 298014	Fax : 01702 298015
Company Representative Name : John Watson	
Email : jwatson@cpholdings.co.uk	

Key Personnel

Name/Job Title	Present at Audit (x)			
	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings				
John Watson – Managing Director	X	X	X	X

Audit Duration Details

On-site audit duration 8 Man Hours
Duration of production facility audit 3 Man Hours
Reasons for deviation from typical (12 hours) or expected on-site audit duration or typical (3 hours) site inspection duration. Very small compact site, with personnel familiar with the BRC process and having relevant documents close at hand

Audit Duration per day

	Start time	Finish time
Day 1	9.00	17.00
Day 2		

Audit Report

Detailed Audit Report

BRC Requirement No.	REQUIREMENT	Conforms	Details
		Y, N or N/A	

1 SENIOR MANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT

1.1 Product Safety and Quality Management System

Statement of Intent	The senior management shall commit the company to producing products to the specified quality and which are safe and legally compliant.	Y	A quality policy is in place signed by the Managing Director stating the company's intention to produce safe and legally compliant products. The policy is communicated to personnel via displaying it in reception and is also included in the quality manual. There is a Quality Policy in place but refers to Global Standard for Packaging and Packaging Materials Issue 3.	
	1.1.1	N	1.1.2	Y

1.2 Senior Management Commitment

FUNDAMENTAL

Statement of Intent	The company's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging and Packaging Materials. This shall include provision of adequate resources, effective communication and systems of management review to effect continual improvement. Opportunities for improvement shall be identified, implemented and fully documented.	Y	
1.2.1	The company's senior management shall ensure that product safety and quality objectives are measurable, established, documented, monitored and reviewed.	Y	The company's management ensure that objectives are measurable against set targets and reviewed in the management review meeting, and also in regular meetings which are held with the senior management team
1.2.2	The company's senior management shall have a system in place to ensure that the company is kept informed of all relevant legislative, scientific and technical developments, and industry codes of practice applicable in the country manufacture and, where known, the country in which the packaging material will be sold.	Y	The company is kept informed by SPA, and British Safety Council, White Sheets (monthly publication for industry), as all products are manufactured and sold within the UK. Issues relating to employment legislation are advised by Abbey legal.
1.2.3	The company shall ensure that the materials manufactured comply with the relevant legislation (including any legislation concerning the use of recycled content) in the country of manufacture and in which the products are intended to be sold and/or ultimately used, where known.	Y	Products supplied comply with the relevant UK legislation, the company collates waste and forwards it onto relevant company's for recycling
1.2.4	The company's senior management shall ensure that non-conformities identified at the previous audit against the Standard are effectively actioned.	Y	No non-conformities were raised at the last audit
1.2.5	The company shall have a current, original copy of the Standard available on site.	Y	Copy of standard available on site
1.2.6	Where the company is certificated to the Standard they shall ensure that recertification audits occur on or before the audit due date indicted on the certificate.	Y	Within the recertification window

1.3 Organisational structure, responsibilities and management authority

Statement of Intent	The organisational structure shall be clear, with defined responsibilities, and key staff shall be aware of their responsibilities with regard to packaging safety and quality.	Y	There is an up to date organisation chart in place ref Management Responsibility The Managing Director is the Designated Hygiene Manager and the Production Director is the Deputy Hygiene Manager	
	1.3.1	Y	1.3.2	Y

QA International Certification Ltd, Dudley Court, Dudley Road, Darlington, Co.Durham, DL1 4GG	Auditor: Anis Munshi		
P027 Issue: 4	Page 5 of 15	Report No: UK/BRC/304	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of QA International

Audit Report

1.4 Management review

Statement of Intent	Opportunities for continuous improvement of the product safety and quality programme shall be identified and effectively implemented through management reviews of the product safety system and results.	Y	The last management review was conducted on 22/12/2011 ref M.R.M.5. The review process included: <ul style="list-style-type: none"> - Internal, second and third party audits (samples of audits conducted were seen) - Incidents, corrective actions etc. were seen - Resource requirements highlighted via the skills matrix which is done as part of the employee review Records of last and previous management review meetings were seen and were found to be comprehensively documented including actions required and by whom	
	1.4.1	Y	1.4.2	Y
	1.4.3	Y		

2 HAZARD AND RISK MANAGEMENT SYSTEM

2.1 Hazard and risk management team

Statement of Intent	The hazard and risk management system shall be managed by a multidisciplinary team competent in hazard and risk analysis.	Y	The hazard risk team comprises of the Managing Director, Production Manager, Machine Minder x 2, and Production Director Training was done by an external consultant from a company called "Scope Business Systems Management Services" and all the members of the project team were trained on the 27 th of September 2009. Training certificates were seen for all the members of the team
	2.1.1	Y	

2.2 Hazard and Risk Analysis

FUNDAMENTAL

Statement of Intent	The company shall establish the effectiveness of its prerequisite programmes through a hazard and risk analysis and identify and implement any further risks to the safety and legality of products.	Y	
2.2.1	The scope of the hazard and risk analysis shall be clearly defined and shall cover all products and processes included within the intended scope of certification.	Y	The scope is defined in the hazard and risk analysis as "the manufacture and supply of corrugated fibreboard, polystyrene and foam packaging products".
2.2.2	The hazard and risk analysis team shall maintain awareness of and take into account: <ul style="list-style-type: none"> • historical and known hazards associated with specific processes, raw materials or end use of the product • relevant codes of practice or recognised guidelines • legislative requirements. 	Y	The team maintain awareness and has taken into account: <ul style="list-style-type: none"> - historical and known hazards associated with the various processes e.g. physical, chemical etc. - relevant codes of practice e.g. hygiene - legislative requirements e.g. based on guidelines from Sheet Plant Association
2.2.3	A full description of the packaging produced by product or product group and its intended use shall be documented.	Y	The packaging produced is corrugated packaging, closures, die cuts, and fittings along with polystyrene and foam packaging products delivered to customers for assembly and filling
2.2.4	A process flow diagram shall be prepared for each product, product group or process. This shall include each process step from the receipt of raw materials to despatch to the customer. The process flow shall as a guide include, as relevant: <ul style="list-style-type: none"> • receipt and approval of art work • receipt and preparation of raw materials such as additives, inks and adhesives • each manufacturing process step • the use of rework and post-consumer recycled materials • any sub-contracted operations • customer returns. The accuracy of the process flow shall be verified by the hazard and risk analysis team.	N	A process flow diagram is in place ref Issue 1 dated 3/9/2009 and has been verified by the hazard and risk analysis team, and includes: The items listed e.g. receipt and approval of artwork, manufacturing steps etc. No re-cycled material is used and nothing is sub-contracted Customer returns is not included in the process flow diagram

QA International Certification Ltd, Dudley Court, Dudley Road, Darlington, Co.Durham, DL1 4GG	Auditor: Anis Munshi		
P027 Issue: 4	Page 6 of 15	Report No: UK/BRC/304	Global Standard for Packaging and Packaging Materials – Issue 4

Audit Report

2.2.5	The hazard and risk analysis team shall identify and record all potential hazards that are reasonably expected to occur at each step in relation to the product and process. The hazards considered shall include, where relevant: <ul style="list-style-type: none"> foreign objects chemical contamination (e.g. taint, odour, allergen, component transfer from inks, varnishes and glues) hazards that may have an impact on the functional of the final product in use. 	Y	The hazard and risk team has identified and recorded potential hazards that occur at each step of the production process e.g. <ul style="list-style-type: none"> Foreign objects e.g. glass, wood splinters etc. Chemical contamination e.g. oil etc. Hazards which may impact on functionality e.g. condensation etc.
2.2.6	The hazard and risk analysis team shall identify control measures necessary to prevent, eliminate or reduce each hazard to acceptable levels.	Y	The hazard and risk team has identified suitable control measures for identified hazards e.g. blades has a system for safe issue and disposal/loss/damage with associated procedures in place
2.2.7	For each hazard that requires control, the control points shall be reviewed to evaluate if existing prerequisites are effective in providing control. Where greater controls are required to the prerequisite programmes, improvements shall be implemented to ensure control is achieved.	Y	Each hazard that requires control is reviewed on a regular basis via internal audits, management reviews, review of procedures etc.
2.2.8	A review of the hazard and risk management system shall be carried out at least once per year and following any significant incidents or when any process changes. The review shall include a verification that the hazard and risk analysis plan is effective and may include a review of: <ul style="list-style-type: none"> complaints product failures recalls product withdrawals results of internal audits of prerequisite programmes results from external third-party auditors. 	Y	The hazard and risk management was last carried out on 22/12/2011 and included all the relevant items indicated e.g. Complaints, results from external third-party auditors, recalls (to date no recalls have been encountered but the system was successfully tested in December 2011), internal audits etc.

2.3 Exemption of requirements based on risk analysis

Statement of Intent	The site has demonstrated adequate compliance with the requirements of this clause.	Y	There are no exemptions to the standard	
	2.3.1	Y	2.3.2	Y

3 PRODUCT SAFETY AND QUALITY MANAGEMENT SYSTEM

3.1 Product safety and quality manual

Statement of Intent	The company shall have a manual that describes how the requirements of the Standard are met. These requirements shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary.	Y	The Quality Manual is well documented and has the appropriate procedures in place The Managing Director holds the master copy and the sub-sections, which are available to all relevant personnel if required	
	3.1.1	Y	3.1.2	Y

3.2 Customer focus and contract review

Statement of Intent	The company shall ensure that customer needs and expectation with respect to quality and safety are identified and met, and that communication channels are clear.	Y	Customer requirements and needs are identified via the internal and external sales team. The measure used to see if customer requirements have been met is via the use of a web based computer system. The company has currently exceeded its customer satisfaction target of 8.0 by achieving a result of 8.4 in 2011
	3.2.1	Y	

QA International Certification Ltd, Dudley Court, Dudley Road, Darlington, Co.Durham, DL1 4GG	Auditor: Anis Munshi		
P027 Issue: 4	Page 7 of 15	Report No: UK/BRC/304	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of QA International

Audit Report

3.3 Internal audits FUNDAMENTAL

Statement of Intent	The company shall establish through a programme of internal audits that the implementation of the requirements of the Standard are in place, appropriate and complied with.	Y	
3.3.1	Internal audits shall be planned and their scope and frequency shall be established in relation to the risks associated with the activity. Audits shall be scheduled so that all aspects of the Standard are audited at least annually.	Y	The internal audits are planned and a schedule is in place covering all the areas. The audit plan for 2012 is in place ref H.S.A.S.1
3.3.2	Audits shall be conducted by personnel who are competent, and sufficiently independent from the department being audited to ensure impartiality.	Y	Audits are conducted by the Production Manager, Sales Manager, Sales Representative, Admin Manager, Transport Manager. All the members have had audit training either externally or internally.
3.3.3	Deficiencies and details of non-conformities shall be notified to appropriate supervisory staff and corrective action implemented within a specified and appropriate time period.	Y	Non-conformities are recorded, allocated to a specific person with a completion date and examples were seen
3.3.4	The completion of corrective action shall be recorded and verified.	Y	Corrective action is recorded and verified
3.3.5	Conformity as well as non-conformity shall be clearly identified and verified within the internal audit report.	Y	Company records both non-conformity and conformity e.g. improvement in the quality of cases being produced by new case maker was highlighted and recorded in an internal audit report

3.4 Supplier approval and performance monitoring

Statement of Intent	The company shall ensure that suppliers of goods and services are operating in a manner that ensures that product quality and safety is not compromised and specifications can be achieved.	Y	There is a documented supplier approval procedure in place ref Assessment of Suppliers and Contractors 3.5.1, and an assessment program ref Supplier/Sub-Contractor Questionnaire S.S.Q.1 As part of the assessment a company is checked to see if they have any or some of the following: - BRC/ISO certification etc. - Via supplier audit - Via supplier questionnaire Suppliers once approved is monitored based on performance (rejects/claims)		
	3.4.1	Y	3.4.2	Y	The company does not use any unapproved suppliers
	3.4.3	Y	3.4.4	N/A	

3.5 Subcontracting of production

Statement of Intent	Subcontractors shall be effectively managed to prevent any risk of contamination or damage and ensure product is produced to specification.	N/A			
	3.5.1	N/A	3.5.2	N/A	No subcontracting is done
	3.5.3	N/A	3.5.4	N/A	

3.6 Documentation control

Statement of Intent	Documentation essential to the management and control of product safety, legality and quality shall be relevant, controlled and available, as the correct version, to the appropriate personnel.	Y	There is a document control procedure in place ref Documentation Control 3.7.4, and is readily accessible by relevant personnel Changes are controlled via a Documents and Issue Control List, and obsolete documents are suitably archived	
	3.6.1	Y	3.6.2	Y

**P027: Global Standard for Packaging and
Packaging Materials Issue 4 February 2011**

Audit Report

3.7 Specifications **FUNDAMENTAL**

Statement of Intent	Appropriate specifications shall exist for raw materials, intermediate and finished products, and any product or service that could affect the integrity of the finished product.	Y	
3.7.1	Specifications shall be suitably detailed, accurate and shall ensure compliance with relevant product safety and legislative requirements.	Y	Specifications are detailed, accurate and comply with all relevant legislative requirements
3.7.2	The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed then the company shall be able to demonstrate that they have taken steps to put an agreement in place.	Y	Specifications are approved by the customer during the contract stage, prior to any manufacturing taking place
3.7.3	Trademarks for application on packaging materials shall, where appropriate, be formally agreed between relevant parties.	Y	Customers supply artwork for trademarks if required which they approve on a sample pack during the contract stage prior to production commencing

3.8 Record Keeping

Statement of Intent	The company shall maintain records to demonstrate the effective control of product safety, legality and quality.	Y	Suitable records are kept e.g. pest control reports and records, maintenance and engineering work, control of glass and brittle plastics etc. for a maximum of 36 months
	3.8.1	Y	

3.9 Traceability **FUNDAMENTAL**

Statement of Intent	The company shall have a system in place to identify product batches and to trace and follow all raw materials through processing to the distribution of the finished product to the customer. Records shall be retrievable in a timely manner.	Y	
3.9.1	An appropriate system shall be in place to ensure that the customer can identify a product or production lot number for the product for the purposes of traceability.	Y	The company has a suitable traceability system in place based on the order number of a job, bar code, pallet label etc.
3.9.2	The system shall be tested to ensure traceability can be determined from raw materials to the finished product and vice versa. This test shall take place at least annually.	Y	The system is tested on annual basis and is capable of being done from raw materials to finished product and vice versa. A traceability exercise was conducted on an item selected at random ref: Order Number 214921 Pack: Can Beac'n Size: 280x262x816, 267gsm Origination No: 8798 Tool Rack 8 No 10 Planned date: 17/11/11, Due date: 22/11/11 Raw material supplier: Jardins P/O: 214921/A 4 Pallets, 700 Ordered, 710 Delivered (the raw material can be traced back by Jardins, and is included as part of the internal test done annually)

3.10 Complaint handling

Statement of Intent	All complaints made by customers and consumers shall be recorded and investigated. Corrective actions where required shall be implemented and recorded.	Y	Complaints are recorded on a computer database via the complaints procedure and are all investigated. Corrective actions are discussed by senior managers and solutions implemented and monitored
	3.10.1	Y	

Audit Report

3.11 Management of incidents, product withdrawals and recalls

Statement of Intent	The company shall have a plan and systems in place to effectively manage incidents and if required the withdrawal or recall of products, in order to ensure that all potential risks to the quality and hygiene and legality of products are controlled.	Y	Product recall procedure in place ref Product Recall 3.12.3 and all relevant personnel are trained. Product Recall Incident Report P.R.I.R.1	
			Any non-conforming product is quarantined in a designated, segregated area, suitably labelled pending decision by senior management on the action to be taken. Key personnel involved are Customer Services, Transport Manager and Production Director. Customer informed via email, and goods are quarantined pending decision Complaint and Corrective Action Report followed, goods examined and damaged removed and remainder returned to customer Last recall test done on 20/12/11	
	3.11.1	Y	3.11.2	Y
	3.11.3	Y	3.11.4	Y

4 SITE STANDARDS

4.1 External standards

Statement of Intent	All grounds within the site shall be finished and maintained to an appropriate standard.	Y	The company is on a self-contained unit Grounds are well maintained, and baits were seen located in suitable positions externally The external building fabric is fairly new as it was re-clad, and no silos or pipes are used for raw materials When the building was built a suitable drainage system was installed Traffic routes are suitably maintained and office personnel turn into designated car park, and product carriers have to go into yard due to height restrictions placed for access into the car park.	
			No external storage is used	
	4.1.1	Y	4.1.2	Y
	4.1.3	Y	4.1.4	Y
	4.1.5	Y	4.1.6	N/A

4.2 Building fabric and interiors

Statement of Intent	The internal site, buildings and facilities shall be suitable for the intended purpose. All utilities to and within the production and storage areas shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.	Y	Walls floors, etc. are suitably maintained Windows doors etc. are kept proofed and closed Suitable and sufficient lighting is provided for a safe working environment Risk of glass breakage is minimal Suitable and sufficient ventilation is provided	
	4.2.1	Y	4.2.2	Y
	4.2.3	Y	4.2.4	Y
	4.2.5	Y		

4.3 Utilities

Statement of Intent	Product cleanliness and integrity shall not be compromised by the location, construction and delivery of the utilities to and within the production and storage areas.	Y	Mains water is used for cleaning print rollers, which is disposed of in the main drainage system	
			No compressed air used on site	
	4.3.1	Y	4.3.2	N/A

4.4 Security

Statement of Intent	Product and process integrity shall be assured through appropriate site security provision.	Y	Access is through the main entrance for all employees and visitors and a reporting system is in place. All staff are suitably trained in site security Majority of the work is carried out by company employees, if contractors are used the maintenance engineer will supervise them throughout their stay Third party transport personnel report to the production area via the yard entry IT systems are backed up on a daily basis A risk assessment has been carried out but there is no procedure in place	
	4.4.1	N	4.4.2	Y
	4.4.3	Y	4.4.4	Y
	4.4.5	Y	4.4.6	Y

Audit Report

4.5 Layout and Product Flow

Statement of Intent	Premises and plant shall be logically designed, constructed and maintained.	Y	The process flow from raw materials to finished goods is arranged to minimise the risk of contamination Premises provide adequate space for working and storage All WIP is suitably labelled at each stage of the process	
	4.5.1	Y	4.5.2	Y
	4.5.3	Y		

4.6 Equipment

Statement of Intent	Product safety, legality and quality shall be ensured through the use of appropriate equipment that shall be properly designed and maintained.	Y	The company installed a case maker in March 2010 after the last audit, and was suitably specified, in terms of usage, design etc. The machine was validated prior to going into routine production, and a maintenance program has been established with the manufacturers assistance and amended to suit the company's system	
	4.6.1	Y		

4.7 Maintenance

Statement of Intent	Proper maintenance and monitoring of all equipment critical to product safety, quality and legality shall ensure consistent high levels of product safety, functionality and quality.	Y	A preventative maintenance program is in place for all the equipment used on site, and was seen for the FFG 2800 A line clearance is performed after maintenance work prior to production starting. Engineering workshops are controlled to minimise the risk of contamination Temporary engineering seen on Topra MD 1224 machine where a card was sellotaped to the exit point to act as a buffer	
	4.7.1	Y	4.7.2	Y
	4.7.3	N	4.7.4	Y

4.8 Staff Facilities

Statement of Intent	Staff facilities shall be sufficient to accommodate the required number of personnel, and designed and operated to minimise the risk of product contamination. Such facilities shall be kept in a good and clean condition.	Y	Suitable hand washing facilities are provided Toilets seen were in reasonable condition with warm water, soap, towels and advisory signs in place Eating, drinking is only permitted in designated room, and all external personnel have to comply with the company's hygiene policy.	
	4.8.1	Y	4.8.2	Y
	4.8.3	Y	4.8.4	Y

4.9 Housekeeping and Cleaning **FUNDAMENTAL**

Statement of Intent	Housekeeping and cleaning systems shall be in place, which ensure that appropriate standards of cleanliness are maintained and that risk of contamination to the product is minimised.	Y		
4.9.1.	Good standards of housekeeping shall be maintained, which shall include a 'clean as you go' policy.	Y	Company has a "clean as you go policy" in place	
4.9.2	The cleaning of production equipment and internal surfaces of storage and production facilities shall be effectively managed using cleaning schedules	Y	Cleaning schedules are located on the machines, and in the appropriate areas	
4.9.3	Cleaning chemicals shall be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers' instructions. Materials and equipment used for cleaning toilets shall be segregated from those used elsewhere.	Y	Water and chemical mixture used for cleaning printing rollers which is disposed of in the main drains Toilets are cleaned using standard household bleach etc. and stored in a locked cupboard in production	

4.10 Waste and waste disposal

Statement of Intent	Suitable facilities shall be in place for the storage and disposal of process and other waste.	Y	Waste cardboard is recycled by being baled and strapped Keeble – recycled process waste EB Waste – domestic material waste Substandard trademarked material is destroyed on site prior to being baled and recycled	
	4.10.1	Y	4.10.2	Y

Audit Report

4.11 Pest Control

Statement of Intent	The company shall be responsible for minimising the risk of pest infestation on the site.	Y	There is a pest control program in place Pest control is performed by a company called Prestige Pest Control Services who are a member of National Pest Technicians Association (Membership No 1615) Expiry 5 th April 2012. The company visits 4 times per year to check the EFK's and 8 times year for mice, rats etc. Pest control records seen for visits made by contractor, and a site plan with the locations. The safety data sheet was seen for the bait used by the contractor "Roban Whole Wheat Bait" was seen Recommendations are actioned ASAP and an example was seen regarding issue raised relating to an EFK unit.	
	4.11.1	Y	4.11.2	Y
	4.11.3	Y	4.11.4	Y

4.12 Transport, storage and distribution

Statement of Intent	The risk of contamination of raw materials and finished products shall be minimised whilst in transport, storage or distribution.	Y	Finished products/materials are not transferred externally, and all materials are suitably identified. All incoming goods are examined for damage etc. prior to being rejected or accepted. No damaged or contaminated pallets are used. WIP is suitably labelled with the order number, barcode number etc. Material for recycling is baled and strapped and stored in a specified location. Company own their own fleet. 4 x 7.5 ton trucks and 1 articulated lorry, which are periodically cleaned as required and inspected as needed. The company does not employ third party contractors, and does not use off-site storage	
	4.12.1	Y	4.12.2	Y
	4.12.3	Y	4.12.4	Y
	4.12.5	Y	4.12.6	Y
	4.12.7	Y	4.12.8	Y
	4.12.9	Y	4.12.10	Y

5 PRODUCT AND PROCESS CONTROL

5.1 Product Design and Development

Statement of Intent	Product design and development processes shall be in place to ensure the production of safe and legal products to defined quality parameters.	Y	Products are designed by the design manager, to meet customer requirements and samples produced for approval A specification is produced for each item and agreed with the customer prior to beginning routine production. The company retains CAD drawings for future reference, any changes lead to the specification being updated	
	5.1.1	Y	5.1.2	Y
	5.1.3	Y	5.1.4	Y
	5.1.5	Y		

5.2 Packaging Print Control

Statement of Intent	Processes shall be in place to ensure that print quality meets agreed specifications and critical print content such as allergen/safety/legal information is fully legible and correctly printed.	Y	The company uses start up checks to ensure there is no loss of information, and does not produce composite prints. Printing plates are numbered and stored in numerical order in racks, and print is approved prior to routine production Certain checks are performed as per industry standard to identify printing errors. The company does not keep samples of printed packaging, but does retain CAD drawings indefinitely. Unused printed product is suitably destroyed, baled and recycled. Quality checks are performed by the operators who have been suitably trained. The does not use print inspection cabinets. Flexographic printing plates seen near Topra MD 1224 with no identification on them	
	5.2.1	Y	5.2.2	N
	5.2.3	Y	5.2.4	Y
	5.2.5	Y	5.2.6	Y
	5.2.7	Y	5.2.8	Y
	5.2.9	Y	5.2.10	Y

Audit Report

5.3 Process Control

FUNDAMENTAL

Statement of Intent	The production process shall be controlled through effective quality assurance of operations to ensure packaging materials can be consistently produced to the quality specified by customers.	Y	
5.3.1	The company shall undertake a review of the manufacturing and, where applicable, printing process to identify critical manufacturing process control points that could affect the quality of the products produced.	N/A	No CCP identified
5.3.2	For each critical manufacturing process control point, machine settings or process limits shall be established and documented – the process specification.	N/A	No CCP identified
5.3.3	Documented process checks shall be undertaken at start up, following adjustments to equipment, and periodically during production, to ensure products are consistently produced to the agreed quality specification.	Y	Examples of checks performed are: - Start-up e.g. specification number, batch number, machine quality check sheet etc. - Batch inspection performed during production run
5.3.4	A clearance procedure shall be in place to ensure that at start up, the line is clear of all previous work and production documents.	Y	Line clearance procedure in place ref Inspection/Checklist 5.2.1
5.3.5	In the event of changes to product composition, processing methods or equipment, the company shall, where appropriate, re-establish process characteristics and validate product data to ensure product safety, legality and quality are achieved.	N/A	No changes have occurred which could impact on the product

5.4 Product inspection and analysis

Statement of Intent	The company shall use appropriate procedures and facilities when undertaking or subcontracting inspection and analyses critical to product safety, legality and quality.	Y	Quality checks are carried out during different stages e.g. from receipt of raw materials to finished products ref Quality Inspection and Checks Checks are performed in goods in and on-line by the operators who have been suitably trained some to NVQ level 2. The site is registered to Investors in People. Frequency of checks are as per industry standard Procedures are in place for each stage of the process		
	5.4.1	Y	5.4.2	Y	No material sent out for analysis
	5.4.3	Y	5.4.4	Y	
	5.4.5	N/A			

5.5 In-line testing and measuring equipment

Statement of Intent	In-line measuring or product testing equipment, where used, shall be tested and maintained to ensure it is effective in ensuring product safety integrity and quality.	N/A			
	5.5.1	N/A	5.5.2	N/A	No in-line testing is done

5.6 Calibration

Statement of Intent	Where specialist measuring is required to assess compliance with product safety and legality, the devices shall be maintained and calibrated.	N/A			
	5.6.1	N/A	5.6.2	N/A	No calibrated equipment used

5.7 Control of non-conforming product

Statement of Intent	The company shall ensure that out-of-specification product is clearly identified, labelled and quarantined.	Y	Control Of Non-Conforming Product ref 5.6.1 is in place in the form of a process flow chart Non-conforming product is documented relating to the final decision on N.C.P.1. Non-conforming product is labelled and quarantined pending final decision from the Managing Director, which is recorded. The corrective action is implemented and documented to avoid recurrence e.g. product made with fluting in the wrong direction, note made on specification to check direction of fluting prior to commencing work on future orders		
	5.7.1	Y	5.7.2	Y	
	5.7.3	Y			

QA International Certification Ltd, Dudley Court, Dudley Road, Darlington, Co.Durham, DL1 4GG	Auditor: Anis Munshi		
P027 Issue: 4	Page 13 of 15	Report No: UK/BRC/304	Global Standard for Packaging and Packaging Materials – Issue 4

Audit Report

5.8 Foreign body contamination control

Statement of Intent	The company shall be able to demonstrate that effective controls are in place to ensure product is protected from contamination during production and storage.	Y	The hazard and risk analysis has identified potential risk from physical contamination e.g. sharps, pests, hairs etc. There is a glass procedure in place and a Glass and Brittle Plastic Inventory. Any breakages are recorded in an incident report form There is a documented policy for sharps ref Knife Cutting Blades and Sharps Control 5.7.11. No blades were seen where they could contaminate the product, and blades are engraved with ID number and dispensing is controlled by the Production Manager. No snap off blades are used Chemicals, adhesives etc. used are of suitable grade Some of the strip lights in the new building are not covered
---------------------	--	---	--

5.8.1 Foreign body control

5.8.1.1	Y	5.8.1.2	N
5.8.1.3	Y		

5.8.2 Sharps Control

5.8.2.1	Y	5.8.2.2	Y
5.8.2.3	Y		

5.8.3 Chemical and biological control

Statement of Intent	Controls shall be in place to prevent contamination from chemical hazards.	Y	
	5.8.3.1	Y	

6 PERSONNEL

6.1 Training and competence

FUNDAMENTAL

Statement of Intent	The company shall ensure that all employees are adequately trained, instructed and supervised commensurate with their activity and are competent to undertake their job role.	Y	
6.1.1	All personnel, including temporary personnel, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.	Y	All personnel have induction training which includes basic hygiene requirement training, and the company uses a skills board to identify and improve training. Temporary staff are only brought in to do unskilled work and are given hygiene training
6.1.2	The company shall routinely review the competencies of staff and provide relevant training as appropriate. Records of training shall be maintained.	Y	Employee is observed performing their job every 6 – 8 months. The company uses a skills matrix and personnel are observed irrespective of how long they have been with the company. The observation is done by the Production Director or Manager. Training records seen for three employees selected at random on different machines and found to be up to date.

6.2 Access and movement of personnel

Statement of Intent	The company shall ensure that access and movement of personnel, visitors and contractors shall not compromise product safety and quality.	Y	There is a plan of the site, and two access points for personnel, travel routes and staff facilities are defined There are designated walkways marked out and products are suitably segregated.
	6.2.1	Y	6.2.2 Y

Audit Report

6.3 Personal hygiene

Statement of Intent	The company's personal hygiene standards shall be documented and adopted by all personnel, including visitors to the production facility. These standards shall be developed with due regard for risk of product contamination.			Y	There is a jewellery policy in place ref Personal Hygiene 1.5.2 Mobile phones are not permitted in production ref Personal Hygiene 1.5.4 Eating/drinking etc. is only permitted in the canteen area ref Refreshments 1.6.1 Drinking of water is permitted near equipment from spill proof containers but is not documented
	6.3.1	Y	6.3.2	Y	
	6.3.3	Y	6.3.4	N	

6.4 Protective Clothing

Statement of Intent	The risk of product contamination from clothing, hair or personal items shall be minimised.			Y	Company has provided a specification on protective clothing ref Work Wear 1.3, five sets of polo shirts and trousers are provided. Clean and dirty clothing is segregated by the provision of lockers. Clothing is laundered at home by employees ref Control of Laundry Clothing is to be kept clean ref Control of Laundry
	6.4.1	Y	6.4.2	Y	
	6.4.3	Y	6.4.4	N/A	No disposable clothing used