Audit Report

Global Standard Packaging and Packaging Materials Issue 5: July 2015

Audit summary			
Company name	Cumberland Packaging Ltd	BRC site code	4477975
Site name	Shoeburyness		
Hygiene Category	Basic Hygiene		

Audit scope	
Scope of audit	The die-cutting, slotting, gluing and flexographic printing of corrugated fibre board to produce plain and printed multipoint glued cases, trays and inserts with cut or un-cut purchased polystyrene void fitments adhered with PVA glue for non-food contact use.
Exclusions from scope	None
Justification for exclusion	N/A

Voluntary modules included		
Modules	Result	Details
Choose a module	Choose an item	
Choose a module	Choose an item	

Audit results			
Audit result	Certificated	Audit type	Announced
Audit grade	AA	Previous audit grade	AA

Number of non-conformities		
	Major against SOI of Fundamental	0
	Critical	0
	Major	0
	Minor	0

Company details

Address	Unit 2 - Bay 6, Campfield Road, Shoeburyness, Southend-on-Sea, Essex, SS3 9BX		
Country	United Kingdom	Telephone	01702 298014
Commercial representative Name	Andrew Reilly	Email	areilly@cpholdings.co.uk
Technical representative Name	John Watson	Email	jwatson@cpholding.co.uk

Company profile

Plant size (square metres)	<10K sq.m	No. of employees	1-50	No. of key processes	1-3
Subcontracted processes	No				
Other certificates held	FSC Chain of Custody				
Regions exported to	None Choose a region				
Major changes or auditor observations since last BRC audit	No major changes since the last audit.				
Company description	The Company was established in 1985 by John Watson and produces Die cut plain and printed corrugated boxes, and shapes and applies polystyrene packaging for void fitments. The products are manufactured for a variety industry sectors including food, which equates to about 20% of their business. The site has ten machines which include a two-colour printer case maker, a two-colour printer slotter, 3 Die cutters a gluing machine and various other ancillary machines. The Company has an integrated Quality and Hygiene Management system with procedure and systems that are in compliance with the requirements of the BRC Global Standard for Packaging and Packaging Materials version 5. The site employs 50 persons with only 35 on site at any one time, production and storage areas work 06:30 to 14:00 and 14:00 to 21:30 Monday to Friday. The unit is 7432 square metres in size. The site has been SMETA audited by BVQI and passed, the reports being uploaded to the SEDEX Website				

Product and process characteristics

Field of Audit (Glass Paper Metal Rigid plastic Flexible plastic Wood and other material Print Chemical processes)	02 - Papermaking 07 - Print processes Category Category Category
Products in production at the time of the audit	Boxes and trays for non-food contact items were in production at the time of the site inspection

Audit duration details

Finish date	2019-12-13		
Re-audit due date	2021-01-06	Previous audit date	2019-01-09
On-site duration	12 Hours	Duration of production facility inspection	4 hours
Reasons for deviation from typical or expected audit duration	No deviation, P509 compliant		
Next audit type selected	Announced		

Audit duration per day

Audit days	Date	Audit start time	Audit finish time
1 (start date)	2019-12-12	08:30	16:30
2	2019-12-13	08:30	12:30

Auditor information

Auditor number	Auditor Name	Role
110021	Paul Blake	Auditor

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.7) Name / Job Title	Opening meeting	Site inspection	Procedure review	Closing meeting
John Watson -Managing Director	X	X	X	X
Ian Stubbles – Compliance Officer	X	X	X	X
Craig Pauley – Machine Operator		X		
Alex Karpouas – Machine Operator		X		
Jason Leppard – Lead Operator		X		

Non-Conformity Summary

Major non-conformity against statement of intent of a fundamental requirements				
No.	**Requirement ref.**	**Details of non-conformity**	**Critical or Major ?**	**Anticipated re-audit date**

Critical			
No.	**Clause.**	**Details of non-conformity**	**Anticipated re-audit date**

Major							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided: document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**

Comments on non-conformities – not tagged, just free text. This is to explain where a large number of minor NCs have been raised without a major

Voluntary Modules Non-Conformity Summary Sheet

Critical			
No.	**Clause**	**Details of non-conformity**	**Anticipated re-audit date**

Major							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided: document, photograph, visit, other**	**Date reviewed**	**Reviewed by**

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided: document, photograph, visit, other**	**Date reviewed**	**Reviewed by**

Detailed Section

1.	Senior management commitment
1.1	Senior management commitment and continual improvement
	Hygiene and Quality policy in place signed by John Watson MD, Chris Monaghan Production Director and Mark Bennet Production Manager and Andrew Reilly Sales Manager dated 2017-03-31, issue 4. Contains commitment to supply safe and legal products. On display for all to see in reception. KPI's and Quality targets are set during the annual management review, current objectives include; - • Customer satisfaction surveys, 85% score per customer, achieving 87.7% score YTD in 37 returns. • Reduce complaints to 10 complaints per 1000 jobs, YTD 5.18 Complaints per 1000 jobs. • OTIF target 85% running at 82% last quarter, overall 85%. The Managing Director has taken control of the system and ensures that there are suitable resources available to effectively run the system and have also now employed Compliance Officer to ensure that they remain complaint with legislative and regulatory requirements. The MD is a member of the Sheet Plant Association (SPA) Industry Body, and use their website, trade publications, BRC Directory for Standard information, they also access BRCGS Participate to keep up to date with Standard changes. The site has a genuine PDF copy of the Standard, downloaded from the BRC Bookshop, and the audit is within the required audit window that closes 2020-01-06. The most senior Operations manager (Managing Director) attended the opening and closing meeting. There were 3 minor Non-conformities raised during the last audit which have all been closed out with the use of root cause analysis. The site uses their NCR process to record 2nd and 3rd party NCR's as it requires the use of root cause analysis to determine the corrective and preventive actions.
1.2	Management review
	The management review is carried out six monthly with interim reviews as necessary. The last review was 2019-12-09 and included the following topics; - • Minutes of the previous Management review • Results of Audits (Internal, 2nd and 3rd Party audits) • Customer Complaints and performance indicators • HARM review – no changes required • Process errors, incidents, corrective actions • Resource requirements • Site's performance against KPI's • Effectiveness of root cause analysis This review is documented, and the minutes circulated to the relevant staff and posted on the noticeboard. Product safety, legality and quality issues are brought to the attention of the production management for resolution.
1.3	Organisational structure, responsibilities and management authority
	The site has an organisation chart in place showing the management structure, dated 2019-01-04, issue 5. This clearly shows the deputies for all persons with management responsibilities. Employees are made aware of their responsibilities during their induction as they start on site and this is followed on by on the job training and refresher training. Detailed responsibilities for all key management roles with regard to hygiene and quality management are in place. Work instructions are in place for every job and on display at point of use.

Non-applicable clauses	None

2.	Hazard and risk management system
2.1	Hazard and risk management team
	The company has carried out a Hazard analysis in accordance with the requirements of section 2 of this standard. The HARM team is multi-disciplined and is led by Mark Bennett (Production Manager) with other team members being the Managing Director, Production Operatives x 2 and Management Systems Support Provider. All the team have received HACCP training from Gareth Jones, external consultant, of Scope Business Systems Management Services, in 2009-09-03.
2.2	Hazard and risk analysis
	The Hazard Analysis Study is at Issue No. dated 2019-11-29. The scope covers all products manufactured in accordance with the die-cutting, slotting and flexographic printing of corrugated fibre board into multipoint glued cases, trays and inserts with cut or un-cut polystyrene void fitments stuck to packaging if required for bakery, cheese, confectionary, ice cream, poultry, beverages, edibles oils, adhesives, mail order, automotive, medical and electrical items The team consider the known likely product defects, historical and known hazards associated with the process or product and relevant codes of practice and legal requirements. A specification for each product is available as part of the works order sheet for the production staff, it includes, materials, dimensions, print content, if required, finished product type There is a process flow diagram in place that covers; • Contract and specification review • Artwork receipt and approval • Receipt of raw materials • Storage of raw material • Each manufacturing process step (Conversion process) • Finished product palletisation and storage for despatch • Customer returns The analysis covers all potential hazards and contamination sources within the process inclusive of foreign objects, contaminants, chemicals, hazards that may impact the functional integrity of final product, the unintended migration of substances, food defence and food fraud. The study is inclusive of risk assessments employing a 3 x 3 matrix rating system for evaluating hazards and identification of CP, CCP's and prerequisites. The prerequisites and QMS work instructions maintain product integrity to produce a safe and legal product meeting customer requirements. Pre-requisite programs are in place covering 21 distinct aspects including Glass and Brittle Plastics, Blades, Sharps and Staples plus Pest Control. Basic Hygiene Risk Category established/referenced by use of determination tree page 9 of issue 5. This is detailed in the analysis which is entirely suited to site manufacturing activities. There have been no CCP's identified in the process. The team are aware the typical and historic hazards associated with the corrugated industry and their customer base. Codes of practice from the European Federation of Corrugated Board Manufacturers (FEFCO), Legislative requirements are obtained from FEFCO and Sheet Plant Association, the latter of which the company is a member. The study is reviewed twice annually as part of the Management Review process, the last review being 2019-12-09 with no amendments needed, the review considers process changes, product changes, product failures, product withdrawals, audit results and new industry developments. The team would be re-

	convened to review the HACCP following serious incidents, changes to the process or the addition of new products or machinery.
2.3	Exemption of requirements based on risk analysis
	No exemption requested by the study or the site.
Non-applicable clauses	2.2.8, 2.2.9, 2.2.10, 2.3.1

3. Product safety and quality management system

3.1	Product safety and quality management system
	The company have a QMS management system that consists of a Quality and Hygiene Policy Manual which is made up of individually controlled sections authorised by J Watson, Managing Director, with supporting procedures and forms incorporating a hazard analysis study. Manual updates are controlled and approved by Managing Director, and reviewed twice annually, last review being 2019-12-09. The system is fully implemented and reviewed at appropriate planned intervals by management review and internal audits.
3.2	Documentation control
	Procedure 3.7.4 Control of Documents in place. Any changes are made through John Watson, Production manager and compliance officer physically change the old documents with the new. Reason for the change are also recorded on Policy Document Amendment Control Sheet (form POACS1). Last recorded change was on 2019-12-11 changed the knife log sheet, with details of change recorded and signed by John Watson (MD). There is a list of controlled documents RCL 1, issue 2 dated 2019-02-14, including the latest revision number. All documents have an identifying number, title and version number to show current status in the footer. Electronic copies are stored on the password and permissions protected computer system that is backed up daily.
3.3	Record keeping
	Procedure No. 3.9.1 (Control of Records) in place, Issue date 2009-09-03 Issue 1. Inspection records completed at each stage of manufacturing process. The MIS system is computer based with bespoke software that holds specifications and product safety information with screens at each workstation, where in process checks are recorded against each batch; the systems are backed up daily. Electronic record retention period being indefinitely on server with daily back-ups taken and stored offsite, and a mirrored server in a different location. Records are logged on a Records Control List and are stored up to 60 months as per a certification requirements.
3.4	Specifications
	Specification made through Abaca software. Examined specification for CPL527703/A for customer EGL Homecare Ltd. Dimensions 278mm X 180mm X 315mm Board R Flute 150W/150T, Die Cut Carton, Printed 2 Colour. Vertical Audit Job (VA Job) CWO264736 for Spicers of Hythe Ltd, Spec No. CPL534048/A, finished dimension internal 445 x 353 x 233mm, Customer Ref Box 120 P, blank size 617 x 1610mm, printed 1 colour with stereo 14/1086. Specifications are entered on the Abaca System to customer requirements, once specifications are approved by customers the specification is activated, by authorised personnel, on Abaca prior to going into production.

	The company has a Declaration of Compliance in place, for their food packaging, which states that the products meet the legal requirements for the UK where they are sold. Trademark goods are only produced if the customer supplies the required artwork, and the whole specification is checked with the customer prior to each production run. The site does not add its logo to any product produced for customers. Specifications are reviewed as part of the contract review process whenever an order is placed. The electronic copies of the specifications are stored on the Abaca System that is password and permissions protected backed up daily and held offsite.
3.5	Internal audits
	The company has a schedule of internal audits to ensure that their systems are compliant with this standard, 2019 schedule has been fully completed and all parts of the Quality and Hygiene System have been covered. The schedule for 2019 has been created and commences in January. Audits are spread throughout the year. All audits are carried out by trained internal auditors and no-one audits an area they are responsible for. Training record were seen for John Watson and M Bennett from Scope Business Systems Management Services 2009-09-24 for a courde on Hygiene and quality system audits. The audits are carried out to a very high standard with the auditor using an "IPAD" to record findings and also to use photographic evidence during the audit, results are scored out of 100% Checked Audit 2019-04-23 (Factory Hygiene) = score of 96.34% and 2019-11-29 (Product and contamination control.) = score of 94.44%. reports show conformance and non-conformance as necessary. Score recorded on two Audit findings from part of the Management Reviews with Corrective actions being reviewed for effectiveness and further improvement as part of the review.
3.6	Supplier approval and performance monitoring
	Supplier Management system in place governed by procedure 3.5.1 - Assessment of Suppliers and Contractors issue 4 2019-12-03. A list of approved suppliers is maintained, the form for which, is dated 2009-09-03 Issue 1 and approved by John Watson. Suppliers are approved on the basis of certificates held and their history with the company, if no certifications are held a completed questionnaire is sought and scored, a physical audit is carried out as necessary. Exceptions are rare, and a Certificate of Conformance or Declaration of Compliance is required to receive goods. DS Smith Approval based on site certifications, BRC expiry 2020-09-02, Jardins Corrugated Cases, Approval based on certifications, BRC Expiry 2020-05-16, Both board suppliers Polystyrene fitments are purchased from approved suppliers to assemble into customer finished goods products.
3.7	Management of subcontracted processes
	There are no sub-contracted processes in use by the site.
3.8	Management of suppliers of services
	The company purchase services for pest control, couriers and waste management. Documented contractual agreements are in place for these suppliers namely, Prokill (Pests), Atlas Couriers and TML (Waste Management).
3.9	Traceability
	Section 8 of Quality & Hygiene Policy Manual covers Product Identification and Traceability, Issue 1 2009-09-03. Traceability is via the company Works Order number which is generated by the Abaca System and is unique to the production run, this number is on all documentation associated with the job as it passes through the process and also on the pallet ID for the customer.

	The site has carried out backwards traceability exercise dated 2019-12-01 on W/O 265466 for Arca Ltd, Materials P/O 337926, DS Smith Blunham delivered 2019-10-30, item specification CPL552350, Produced 2019-10-30, Qty Produced 680, 4 pallets (3x180 1x140). Delivered 2019-10-30 on delivery note number VTR 022610. Forwards traceability carried out on 2019-12-01 for a batch of stock board 125K/125T BC flute, size 1570 x 2450, received 287 from DS Smith Blunham on 2019-08-16 from purchase order CPO336601. This board was used for 13 CWO's that went through the business, these were 263011 for 18 sheets, 263211 for 31 sheets, 263394 for 51 sheets, 263295 Part A for 21 sheets, 263295part B for 22 sheets, 263339 for 37 sheets, 264102 for 12 sheets, 264097 for 13 sheets, 264102 for 12 sheets, 264101 part B for 11 sheets, 264101 part A for 32 sheets, and 264907 for the remaining 13 sheets, 14 boards were lost as waste. 287 sheets traced and from the CWO full traceability is possible as shown above. The traceability system was formally tested on the day, it was done with VA Job CWO264736 for Spicers of Hythe, the raw material was purchased on CPO337537(purchase order) and the raw material spec was CPL534048/A for a 0201 glued case cust ref, Box 120 P, on Cust Po 19457, printed one colour with stereo 14/1086 on 125K/125T double wall board from DS Smith. Ordered on PO CPO337537 delivered on 6 pallets 2019-10-09. Rework of product ids not carried out.
3.10	Customer focus and contract review
	The QMS has identified roles that are responsible for the communication with the customer, this is carried out by the Sales department, via e-mail and telephone calls predominantly. Customer needs and expectations are stored on the Abaca System in the form of specifications, each time a customer places an order, the specification is checked and confirmation that is correct is sought from the customer prior to production. Changes to a specification of a product would mean new specification number, or in the case of just a print content change, a change to the specification suffix. Customers due not set their own performance criteria or indicators.
3.11	Complaint handling
	Complaints are handled in line with Procedure 3.11.1 Customer Complaints, Issue 2, 2019-01-03. Complaints are investigated to find root cause for corrective actions to be implemented and are reviewed for effectiveness. Complaints are trended to find any significant issues. System updated to a new electronic portal that has customer access so they can view and follow responses. 113 Internal and External complaints raised in 2019 despite an increase in works orders for the same period. All records are stored on the computer system. It was the trending of complaints that highlighted issues with pallet presentation (12 complaints), and Admin errors (6 complaints). Viewed 2 complaints; - 425, from Switch Packaging. 2019-11-05, for Ghosting on print, Site has site has picked up the delivery and sorted the board, checked and found no issue and the product returned to the customer. 409, Allied Hygiene, 2019-10-23, Lorry loaded unsafely, vehicle route changed, and the loader and drivers have been made aware of the issue to ensure there is no repeat.
3.12	Management of product withdrawals, and incidents and product recalls
	All personnel advised on Induction and at appropriate intervals on incidents and actions to be taken; records of training on file. Product recall – withdrawal procedure 3.12.3, issue 1 dated 2009-09-03, supplemented by Control of Non-Conforming Product 5.6.1. Contact details for customers are held on system database. The system can be activated during normal working hours and customers have contact telephone details of Sales Area Managers and appropriate Business contacts for out of hours situations. The designated manager, the \md, is responsible for making sure that any withdrawal is recorded and wntered into the NCR system to

	ensure tht root cause analysis is used to determine the corrective and preventive actions to be implemented to prevent a re-occurrence. Mock Product withdrawal carried out on the 2019-10-22 with Interpak, Job CWO254548. Interpak confirmed product was there and quarantined, customer contact John Williams. An operational quarantine system is in place to control non-conforming product to prevent delivery until released, for use or destruction, by senior managers.
Non-applicable clauses	3.4.4, 3.7, 3.9.5, 3.10.3

4. Site Standards

4.1 External standards

The site is situated between the main railway and sidings and residential housing on the edge of Shoeburyness. The site, built in 1985, is in a self-contained end terrace unit with well-maintained grounds. The external fabric is in good condition and maintained that way by the company. The site has a railway yard and station to the rear, private housing to the front and rear and another company next door whose operations do not pose a risk to the company's products.
Roller shutter doors are on a timer to close within 3 minutes of opening if a forklift does not pass through.
External drains have covers in place to prevent entry of pests.
The external storage of raw materials is not required or possible due to the nature of the raw materials.

4.2 Building fabric and interiors

The building is of portal frame construction with metal cladding over brick/blockwork. The internal walls are made from brick/blockwork that has been painted to facilitate cleaning, sealed concrete floors and suspended ceilings are kept in a good condition, lights in the production area are sleeved to protect product and machines against glass fragment in the case of breakage, with the same on flying-insect control devices windows in the production area are within the walkways and away from product, the lighting levels was found to be suitable and sufficient for a safe working environment. All doors and windows are suitably sealed to prevent pest ingress, all wooden workstations are in good condition with rough areas/edges that might be a risk to product. Suitable and sufficient ventilation is provided.

4.3 Utilities

Water is provided by Anglian Water, via the mains and is of potable quality and used for domestic type purposes and not used in the process, Compressed air is from maintained compressors which have filtered lines that provide air to the production machinery. Water and compressed air do not come into contact with the finished product.

4.4 Security

The site has a Security Risk Assessment dated 2019-12-06. Access is through the main entrance for all employees and visitors and a reporting system is in place a "Visitors and Contractors Health Questionnaire" which has been computerised and a printed badge, which contains a monochrome image of the visitor, is produced and has to be worn. CCTV system and external lighting covers all entrances to the factory. All staff are suitably trained in site security. Majority of the work is carried out by company employees, if contractors are used the Production Supervisors will supervise them throughout their stay. Contractor Duties are outlined and signed. Third party transport personnel report to the production area via the yard entry. There is a service agreement in place for software to be backed up on a second server and on a daily basis back-up copies of the system are taken off site.
There are no external storage tanks or silos.

4.5	Layout and product flow
	A site plan has been produced that shows; • Personnel access points • Travel routes • Staff facilities • Process flow • Storage areas Process flow has been put in place in such a way so as to reduce the risk of contamination or damage to the product. There is sufficient working space and storage capacity to allow operations to be carried out properly. Designated walkways are provided through the production areas.
4.6	Equipment
	The equipment is designed specifically for its intended purpose and is maintained in a good condition. Any new equipment is fully specified prior to purchase and installed and commissioned by the manufacturer during which time the site determines the hygiene and maintenance schedule to be implemented.
4.7	Maintenance
	A preventative maintenance program is in place for all machinery. This is managed by Anthony Murphy, Site Engineer. Examined monthly records for Eterna die cutter as completed to date for 2019-12-12, managed electronically with full traceability. Engineering workshops are controlled to minimise the risk of contamination, with swarf mat in place to prevent debris from entering the production area. Maintenance record for the case maker for the time of the production of the VA Job 264736 were checked for 2019-10-02 and found to be quite comprehensive and complete and includes. Any repairs or maintenance is followed by a machine inspection that is signed by the engineer and the operator to agree that the machine is ready for production. No temporary engineering was seen during the site inspection and the site has a log for temporary engineering if need to record the reason and duration of an such action.
4.8	Housekeeping and cleaning
	The company has a 'Clean as You Go' policy in place, with cleaning schedules for the machines and general areas. Documented cleaning procedures are detailed on the individual cleaning record at each machine and these specify the machine to be cleaned, frequency of cleaning, method and any cleaning materials to be used. Cleaning records seen for the FFG2800 Casemaker dated 2019-12-12 completed by J Leppard, the records were completed satisfactorily. Records for the time of the VA Job 264736 were checked for the machine that produced the VA Job 264736, the Casemaker, 2019-10-09, were seen and found to be completed correctly. Cleaning chemicals are stored in a cupboard away from the production area. The equipment for cleaning the toilets is segregated from that used in other areas.
4.9	Product contamination control
4.9.1	Glass, brittle plastics, ceramics and similar materials control
	Glass and brittle plastics procedure 5.7.2, in the production area are kept away from the product and deemed a low risk, however the lighting does have sleeve tubes fitted. There is an incident reporting system in place that requires the isolation and quarantining of any product in the vicinity of any kind of glass-brittle

	plastics so that it can be checked for contamination before it is sent to customers. The incident report is signed by a senior manager and brought to the attention of the MD, there have been no recorded incidents in the last 12 months. Glass audit last carried out 2019-01-28.
4.9.2	Sharps control
	A procedure is in place for the control of knife cutting blades and sharps control, Number 5.7.11, issue 3 2019-11-19, all blades seen during the audit were controlled and not in a position to contaminate product, all were numbered which reflect the number in the register. Date of when sharps are issued and removed are recorded, if an employee no longer requires the item or leaves the company or has it replaced. Snap off blades are not permitted on site.
4.9.3	Chemical and biological control
	All non-production chemicals are stored away from the production areas, chemicals are stored in labelled containers away from production product and materials. COSHH rules are followed. |Strongly scented chemicals are not used or permitted on site,
4.10	Waste and waste disposal
	Wastewater is taken by Anglian water (trade effluent). Waste cardboard is recycled by being sent to the baler using conveyors and strapped. The company uses: TLM Management Ltd for recycled paper waste and general waste - waste licence no CBDU110058, expiry date 2022-05-24. Substandard trademarked material is destroyed as part of the baling process and is then collected for recycling.
4.11	Pest control
	The site has engaged the services of a company called Prokill for pest control, they are contracted for 8 routine, 4 EFK services and 1 EFK tube change visit. Contract Is for rodents, flying and crawling insects, all baits are toxic all shown on an up to date bait plan, last visit 2019-01-03, where no internal activity was found or significant insect activity, but some rat activity was found at the external baits no 1 as detailed on Pest Control Report. All 8 routine visits, 4 EFK visits and 1 EFK Tube Change visits were carried out in accordance with the schedule over the last 12 months. EFK tubes changed 2019-01-03. There is a site plan showing 4 external bait traps, 29 internal baits, 5 electronic fly killers. Date 2019-01-04 All Pest Control Safety Data Sheets are present in the Pest Control folder, e.g. Bromadiolone (Jade Block) and Diffenacoum (Ruby Block). Prokill are a member of the British Pest Control Association number M15/737, valid until 2020-02-29. Pest control equipment is installed in appropriate locations and is operational. Employees are aware of the need to report any signs of pest infestation to their line manager or senior management.
Non-applicable clauses	4.1.5, 4.3.2, 4.4.3, 4.11.3,

5.	**Product and process control**
5.1	Product development
	The design of most products is provided by the customer with very few being produced in house, those that are being done by the Design Manager, samples are produced, and customer approval is sought before moving on to the production run. Once approved the specification is made active in the Abaca system so

	that it can be used for a production run. Short trial runs are manually produced. The company retains CAD drawing for future reference, any changes will lead to a new specification being created.
5.2	Graphic design and artwork control
	The site has a 5.7.12 Customer Artwork Approval Procedure in place, issue 1, dated 2019-02-15. All graphic designs are received from the customer and sent to RED32 the Stereo Supply company to produce the design, this is returned to the company who send it to the customer to get approval before Red 32 produce the Stereos for the print process, the stereos are identified by the specification number for traceability. All works orders that require print have the stereos code and location listed, this is cross checked prior to running against the print specification via the Abaca system. The use of Colour standards and artwork masters is limited due to the fact that most jobs are single colour text prints. Changes to a specification are handled as new products and have to follow the processes of new jobs for approval etc. All stereos produced by RED32, artwork contractor hold an identification label that details the job specification. Artwork approval for the VA JOB 264736 was checked and found, signed off by 2015-07-02 via e-mail to John Bailey.
5.3	Packaging print control
	The site carried out a HARM study that has considered the risks of loss of information and of mixing. A system of start-up checks is in place to ensure that there is no loss of information. Printing stereos are stored in hanging racks to minimise the risk of damage, each print run is approved against the print specification and this is recorded in the Abaca system, with a number of checks in place as product comes off the slotter and casemaker, any print errors noticed are corrected and any non-conforming product destroyed. Composite printing is not carried out on site. Samples are retained at the machines for reference for 48 hours as well as CAD drawings and Abaca process check records kept indefinitely. Colour matched against a colour swatch visually in ambient light, light boxes not in use.
5.4	Process control
	The site has considered the risks of the manufacturing and printing processes part of their HARM Study. Process Control is covered by procedure No 5.2.1, issue 3 dated 2016-01-23, which details a process flow chart and has Appendices 1 to 18 detailing the specific procedures and checks that are followed, e.g. Appendix A2 refers to Inline (Casemaker) machine that produced the VA Job, 264736, dated 2018-07-31, Issue 3. This work instruction is attached to the side of the machine. The procedure details the Set-Up Checks, Set Up Quantities, Quality inspections and Checks, First Off Checks, In-Process Checks, Acceptance Criteria for Quality and Contamination Prevention. A bill of materials is in place in the form of Works Order and Production specifications are held within the Abaca system and become available on screen when an operator looks at a job, this specification will determine the material used and therefore the machine settings required. A documented works instruction at each machine outlines the sampling regime and what checked are to be carried out, these checks are recorded in the Abaca system. There is a line clearance process in place between jobs, any changes to a product will result in a new specification and the process characteristics will be captured at this point and determined by materials and machine used.
5.5	Calibration and control of measuring devices
	It is not necessary to calibrate equipment as products are made to generous tolerances, measurements are controlled by purpose made formes which cannot be altered on site, these formes are precision cutters built to specification. Steel rule and tapes are used to check basic dimensional measures, these are replaced as required.

5.6	Product inspection, testing and measuring
	The company HACCP has determined that no in-line testing or measuring equipment is necessary. However, cutting formes are used within the cut/crease machine in-line as part of the tooling and these are manufactured to standard industry tolerances. In addition, off-line checks are carried out to industry standard as defined by the works instructions displayed at each machine. Documented procedures and work instructions are in place and available at point of use and checked during internal audits at least twice per year. The company does not undertake any analyses of products by laboratories.
5.7	Control of non-conforming product
	Procedure in place Control of Non-Conforming Product ref 5.6.1, issue 1, dated 2009-09-03, 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 placed in the quarantine segregated area (material prevented from being shipped by MIS inventory system), pending final decision from the Managing Director/Production Director which is recorded. The corrective action is implemented and documented to avoid recurrence, quarantine area empty at the time of the audit.
5.8	Incoming goods
	Incoming goods are received and inspected in accordance with procedure 5.2.1 Appendix A-1, issue 1, dated 2009-09-09. Raw materials are received from three main suppliers (Jardin, Smurfit, On Board and DS Smith) once unloaded, the pallets are subjected to a visual inspection then are scanned into the Abaca system where they are checked against the Purchase Order to ensure they are what was ordered. Once scanned in they are stored in a scanned location of the warehouse area ready for production to use. Checked delivery paperwork for delivery from Onboard Corrugated Ltd, Delivery note No. S/O3269938/001 for 15 pallets of variety of board grades for 4 W/O, scanned into the business and scanned into the relevant locations for the next process.
5.9	Storage of all materials and intermediate and finished products
	All materials are identified by code and WIP by the Works Order number for full traceability, the warehouse area is treated the same as the production area, with controls in place for glass, blades and pests. All pallets of WIP were seen to be labelled during the site tour, with WIP Labels waiting to be placed in pallets currently being packed. Hazardous chemicals are not stored in the warehouse area, any hazardous chemicals used on-site are stored in appropriate storage locations which minimise any risk to product quality or legality. All material destined for recycling is baled and stored until taken for recycling.
5.10	Dispatch and transport
	Palletisation, storage and loading is controlled in accordance with procedure 5.2.1 Appendix A-18, issue 1 dated 2009-09-03. All products and materials are identified by pallet labels through the process, raw materials from supplier WIP and Finished Product by the company's own, WIP and Finished product labels have the Works Order Number on for traceability. During transportation all pallets are strapped and wrapped for product protection. Only good pallets are used for stock, all damaged or weak pallets are put to one side and picked up by a pallet dealer. The company own 7 vehicles, 2 artic and 5 18 tonners', that are commercially cleaned weekly and maintained through a service agreement with the suppliers. All vehicles are hygiene checked prior to loading with Drivers completing the Drivers Defect Sheet and unsuitable vehicles are not used until they are cleaned to the correct standard of cleanliness, there is an agreed terms and conditions document in place the

	couriers used. All drivers comply with the site rules relevant to this Standard, Drivers do not need to enter the production or storage areas of the site. Checked delivery documents for despatched during the audit. Delivery note VTR 0123096 for 1 lines to H Smith Plastics Ltd, 2 pallets signed R D Brett for the receipt by the customer.
Non-applicable clauses	5.3.5, 5.3.8, 5.5, 5.6.3, 5.6.7,

6.	Personnel
6.1	Training and competence
	All personnel receive induction training before starting their first shift in production or storage areas and are supervised by their team leader. Once they have been assigned an area of work, they get on the job training, which is signed off and recorded for the processes they are working. Regular reviews of training are carried out to ensure that staff are competent to carry out their tasks. Training Records for Jason Leppard – Casemaker Operator, machine training program for the casemaker, 2018-090-10, signed off by Mark Bennet, Krzystof Kropidowlski – Casemaker operator, machine training program for the casemaker 2018-09-19, signed off by Jason Leppard. The induction includes all aspects of operating the machine and product quality and hygiene checks. Training records are now being completed electronically and include the duration of training.
6.2	Personal hygiene
	The company HACCP has determined the jewellery policy that includes no wristwatches or mobile phones, only plain band rings and small sleeper earring are permitted as visible jewellery. The hygiene policy forms part of the induction programme to ensure that all staff know it. All production and storage staff are provided with a locker for the storage of personal belongings.
6.3	Staff facilities
	Suitable hand washing facilities are provided Toilets seen were in reasonable condition with soap, towels and advisory signs in place and do not open directly into the production or storage areas. Eating, drinking is only permitted in designated canteen room, and all external personnel have a requirement to comply with the company's hygiene policy. Smoking is only permitted at a designated, part covered external location that was seen to be kept in a clean condition. Drinking of water is allowed on the shop floor using spill proof containers.
6.4	Protective clothing
	The company have used hazard and risk principles to determine the need for protective clothing and where it may be worn. Risk assessment dated 2019-09-22. Company issued protective garments consist of 3 x Polo shirts, trousers and T-Shirts that are suitable and sufficient. Workwear is maintained by self-care laundering provision with self-care guidance in section 14 laundry. Additional supplies of clothing available held on site for unplanned circumstances. The condition of clothing is monitored for compliance via production management. Clothing is permitted to be worn between all departments and can be worn for travelling to and from the workplace. Disposable clothing is not used.
Non-applicable clauses	None,

Traded Goods Module	
Scope	
7.1	Approval and performance monitoring of manufacturers/packers of traded food products
7.2	Specifications
7.3	Product inspection and laboratory testing
7.4	Product legality
7.5	Traceability
Non-applicable clauses	