



# 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 conversion of corrugated diecut fibre board, multipoint gluing into cases, trays, inserts & polystyrene void fitments with flexographic printing used as secondary packaging for bakery, cheese, confectionary, ice cream, poultry, beverages, edibles oils, adhesives, mail order, automotive, medical & electrical items
Exclusions from scope	None
Justification for exclusion	None

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	A	Previous audit grade	AA

Number of non-conformities	Major against SOI of Fundamental	0
	Critical	0
	Major	0
	Minor	8

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### 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	<a href="mailto:areilly@cpholdings.co.uk">areilly@cpholdings.co.uk</a>
Technical representative Name	John Watson	Email	<a href="mailto:jwatson@cpholdings.co.uk">jwatson@cpholdings.co.uk</a>

### 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	None				
Regions exported to	None Choose a region Choose a region Choose a region Choose a region				
Major changes or auditor observations since last BRC audit	No major changes have been made since the last audit				
Company description	<p>The Company was established in 1985 by John Watson and produces Die cut plain and printed corrugated boxes, and polystyrene packaging for void fitments. The products are manufactured for a variety industry sectors including food, which equates to about 20% of their business.</p> <p>The site has ten machines which include a two colour printer case maker, a two colour printer slotter, 2 Die cutters and various other ancillary machines. A new Eterna PE1620SA diecutter and Mosca pallet strapping and wrapping line was installed in the last 12 months and are both in full operation. The Company has an integrated Quality and Hygiene Management system with procedure and systems that are in compliance with the requirements of the</p>				

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## Company profile

	BRC Global Standard for Packaging and Packaging Materials. The site employs 50 persons with only 30 on site at any one time. The unit is 3,900 square metres in size. The site have also embarked on a two year lean manufacturing improvement program working with a specialist consultant.
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## 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 Category Category
Products in production at the time of the audit	Corrugated cases and cartons for food and other customers

## Audit duration details

Finish date	2016-12-13		
Re-audit due date	2018-01-06	Previous audit date	2016-01-06
On-site duration	12 hours	Duration of production facility inspection	4 hours
Reasons for deviation from typical or expected audit duration	None		
Next audit type selected	Announced		

## Audit duration per day

Audit days	Date	Audit start time	Audit finish time
1 (start date)	2016-12-12	0900	1715
2	2016-12-13	0845	1300

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Auditor information		
Auditor number	Auditor Name	Role
110028	Graham Rowan	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)	Opening meeting	Site inspection	Procedure review	Closing meeting
John Watson, Managing Director	X	X	X	X
Mark Bennett, Production Manager		X		
Anthony Murphy, Site Engineer		X		
Chris Monaghan, Production Director		X		
Malcolm Fairman, Design Manager		X		
Adrian Kean, Projects Designer		X		

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## 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

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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
1	3.4.3	The company do not have a Declaration of Compliance in place, to cover the secondary food packaging that is produced at the site.	We have updated our website with a declaration of compliance	Misunderstanding of new Issue 5 requirements – now included on website	New declaration provided via link to website: <a href="http://www.cumberlandpackaging.co.uk/brc.php">http://www.cumberlandpackaging.co.uk/brc.php</a>  Please view on line	2017-01-25	G. Rowan
2	3.8.1	There is no documented procedure for the approval and monitoring of suppliers of services.	Procedure 3.5.1 covers products, materials or services.	Whilst we had the procedure in place we had not used it for service providers e.g. Waste management ,pest control or subcontracted transport services.	Procedure 3.5.1 provided where the first paragraph Scope and objective clearly states this procedure relates to services. Approved supplier register provided, updated with service providers.	2017-01-25	G. Rowan
3	4.1.3	The roller shutter doors to the main goods-in/goods out bay and the roller shutter door on the baler remain open throughout the day when not in use.	Roller shutter doors are now closed when lorries are not being unloaded	We are currently researching the option to make this an automatic door to save on the labour efficiencies and take out any humane error in not shutting the rollers. Proposed installation 3 months.	Memo to staff and signage on the Roller shutters provided.	2017-01-25	G. Rowan
4	4.7.4	Temporary Engineering in form of tape across the side panel door was seen on Eterma Diecutter, this was not recorded	This has now been fixed and temporary engineering log created	Our temporary engineering was in a very good state and best practice is to fix anything during inspections however this item needed a part ordered so required entering onto the log which did not exist ( Now	Provided photograph of the side panel now fixed and also the Temporary engineering log provided.	2017-01-25	G. Rowan

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		on a Temporary Engineering Log.		the log is created and operational)			
5	4.9.3	A 25kg container of Ionised Water for use with the FLT batteries was seen in the warehouse with an additional unmarked container adjacent containing clear liquid.	The unmarked container was a decanter for the Ionised Water	The decanter had some water left in and as the container was unmarked it was unclear what the substance was, we now understand that the decanter must always be marked up to show exactly what is in the container.	Photo provided of the decanter labelled up	2017-01-25	G. Rowan
6	5.2.1	There is no documented artwork procedure which covers the process steps including how information is collated and received for artworks, verified/ approved by the customer.	A procedure has now been documented	Whilst we had no documented procedure/control the actual process was being followed.	New document provided	2017-01-25	G. Rowan
7	6.2.1	The company determined, based on risk, that watches should not be worn by personnel yet an operator on the slotter machine was seen wearing a watch during the production facility inspection.	The operator has been spoken to and understands the BRC controls	A refresher memo has been sent to all employees reminding them of their responsibilities and this memo has also been published on the notice board.	Copy Memo provided together with photo of it being displayed on the notice board.	2017-01-25	G. Rowan

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8	6.3.6	Drinking of water is taking place out with designated areas in the production department.	All operators have been spoken to and understands the BRC controls in respect of screw top bottles	A refresher memo has been sent to all employees reminding them of their responsibilities and this memo has also been published on the notice board	Copy Memo provided together with photo of acceptable bottles .	2017-01-25	G. Rowan
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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

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## Voluntary Modules Non-Conformity Summary Sheet

Critical			
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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

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Minor							
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## Detailed Section

<b>1.</b>	<b>Senior management commitment</b>
<b>1.1</b>	<p><b>Senior management commitment and continual improvement</b></p> <p>Hygiene and Quality policy in place signed by John Watson MD, Chris Monahagn Production Director and Mark Bennet Production Manager and Andrew Reilly Sales Manager dated 2016-01-26, issue 3. Contains commitment to supply safe and legal products. Clear objectives are set during each management review and these are reviewed during review meetings. For example – “Improve the booking in procedures” allocated to Paul Hammans (Office Admin Manager) due by 2016-12-31 and “SMED and 5S programs” allocated to Mark Bennett due by 2016-12-31. Signed copy displayed on wall in Reception.</p> <p>The site employs the use of an external consultant on a monthly basis one of who is a member of the Sheet Plant Association (SPA) Industry Body, and use their website, BRC Directory for Standard information.</p> <p>The site has also employed the services of a Lean Manufacturing Consultant who is working on improvement projects.</p> <p>The site has a genuine PDF copy of the Standard, and the audit is being carried out within the required audit window.</p> <p>The most senior Operations manager (Managing Director) attended the opening and closing meeting.</p> <p>There were 4 minor Non-conformities raised during the last audit which have all been closed out with the use of root cause analysis.</p>
<b>1.2</b>	<p><b>Management review</b></p> <p>The management review is carried out six monthly with interim reviews as necessary. The last review was 2016-11-30 and covered the following topics</p> <ul style="list-style-type: none"> <li>• Minutes of the previous Management review</li> <li>• Results of Audits (Internal, 2<sup>nd</sup> and 3<sup>rd</sup> Party audits)</li> <li>• Customer Complaints and performance indicators</li> <li>• HARM review – no changes required</li> <li>• Process errors, incidents, corrective actions</li> <li>• Sites performance against KPI's</li> </ul> <p>Quality target is 0.5% and current levels are exceeding target at 0.2%.</p> <p>This review is documented and circulated to the relevant staff.</p> <p>Product safety, legality and quality issues are raised as Internal complaints which are dealt with as external complaints and fully investigated</p>
<b>1.3</b>	<p><b>Organisational structure, responsibilities and management authority</b></p> <p>The site has an organisation chart in place showing the management structure, dated 2016-01-26 issue 4. This clearly shows the deputies for all persons with management responsibilities. Detailed responsibilities for all key management roles with regard to hygiene and quality management are in place.</p> <p>Work instructions are in place for every job and on display at point of use.</p>
<b>Non-applicable clauses</b>	

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<b>2. Hazard and risk management system</b>	
<b>2.1</b>	<b>Hazard and risk management team</b>
	The company has carried out a Hazard analysis in accordance with the requirements of section 2 of this standard. The HACCP 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.
<b>2.2</b>	<b>Hazard and risk analysis</b>
	<p>The Hazard Analysis Study is at Issue No. 3 dated 2016-06-30.</p> <p>The scope covers all products manufactured in accordance with the conversion of corrugated die cut fibre board, multipoint gluing into cases, trays, inserts &amp; polystyrene void fitments with flexographic printing used as secondary packaging for bakery, cheese, confectionery ice cream, poultry, beverages; edible oils adhesives mail order automotive, medical &amp; electrical items.</p> <p>There is a process flow diagram in place that covers;</p> <ul style="list-style-type: none"> <li>• Contract &amp; specification review</li> <li>• Artwork receipt &amp; approval</li> <li>• Receipt of raw materials</li> <li>• Storage of raw material</li> <li>• Each manufacturing process step (Conversion process)</li> <li>• Finished product palletisation and storage for despatch</li> <li>• Customer returns</li> </ul> <p>The analysis covers all potential hazards and contamination sources within the process inclusive of foreign objects, contaminants and chemicals. The study is inclusive of risk assessments employing a 3 x 3 matrix rating system for evaluating hazards &amp; identification of CP, CCP's &amp; prerequisites. The prerequisites and QMS work instructions maintain product integrity to produce a safe and legal product meeting customer requirements.</p> <p>Pre-requisite programs are in place covering 21 distinct aspects including Glass &amp; Brittle Plastics, Blades, Sharps &amp; Staples plus Pest Control. Low 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.</p> <p>There have been no CCP's identified in the process.</p> <p>The team are aware the typical and historic hazards associated with the corrugated industry and their customer base.</p> <p>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.</p> <p>The study is reviewed twice annually as part of the Management Review process, the last review being 2016-11-30 with no changes needed.</p>
<b>2.3</b>	<b>Exemption of requirements based on risk analysis</b>
	There were no requests for exemptions
<b>Non-applicable clauses</b>	<b>2.2.8, 2.2.9</b>

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<b>3.</b>	<b>Product safety and quality management system</b>
<b>3.1</b>	<b>Product safety and quality management system</b>
	The company have a QMS management system that consists of a Quality & Hygiene Policy Manual Issue 1 dated 3 <sup>rd</sup> September 2009 authorised by J Watson Managing Director with supporting procedures & forms incorporating a hazard analysis study. Manual updates are controlled & approved by Managing Director, and reviewed twice annually, last review being 2016-11-30.
<b>3.2</b>	<b>Documentation control</b>
	<p>Procedure 3.7.4 Control of Documents in place, Issued 2012-12-01, version 2. Any changes are made through John Watson, who physically changes the old documents with the new. Reason for the change are also recorded on Policy Document Amendment Control Sheet (form P0 ACS1). Last recorded change was on 2016-11-23 with New Organisation Chart created with details of change recorded and signed by John Watson (MD).</p> <p>All documents have an identifying number, title and version number to show current status. Electronic copies are stored in a controlled folder on the computer system. These are password protected by the document owner (John Watson) and therefore no other employees can access these which prevents loss or malicious intervention.</p>
<b>3.3</b>	<b>Record keeping</b>
	<p>Procedure No. 3.9.1 (Control of Records) in place, Issue date 2009-09-03 version 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 work stations, 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. Records are logged on a Records Control List and are stored up to 36 months depending on record type.</p>
<b>3.4</b>	<b>Specifications</b>
	<p>Specification made through Abaca software. Examined specification for CPL502719/A for customer Bonians Ltd. Dimensions 303mm X 229mm X 137mm Board B Flute 200 WK/200T171HB. Specifications are only entered on the Abaca System if they have been agreed with the customer. Specifications for new products are produced and are also approved by customers prior to going into production. These are then entered into the Abaca system for further use. The company do not have a Declaration of Compliance in place, as the packaging is secondary food packaging and is therefore required.</p> <p><b>This was recorded as Non-Conformity No.1 (3.4.3).</b></p> <p>Products do 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 Abaca System has controlled access to protect sensitive files and these are backed up daily and held offsite.</p>
<b>3.5</b>	<b>Internal audits</b>
	The company has a schedule of internal audits to ensure that their systems are compliant with this standard, 2016 schedule has been fully completed and all parts of the Quality & Hygiene System have been covered. The schedule for 2017 has been created and is ready to commence in January.

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	<p>All audits are carried out by trained internal auditors and no-one audits an area they are responsible for. 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 Q3 audit No. 9 (Fabrication of Building) = score of 90% and Q3 audit No. 4 (Personal Hygiene Controls/Facilities) = 91%. Audit findings form part of the Management Reviews with Corrective actions being reviewed for effectiveness and further improvement as part of the review.</p>
3.6	Supplier approval and performance monitoring
	<p>Supplier Management system in place governed by procedure 3.5.1 - Assessment of Suppliers and Contractors issue 2 2016-01-26. A list of approved suppliers is maintained, 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. New supplier (On Board) was taken on in 2016 with supplier audit carried out at their site 2016-06-01. Polystyrene fitments are purchased from approved suppliers to assemble into customer finished goods products.</p>
3.7	Management of subcontracted processes
	<p>The only sub-contracted process is the production of artwork and stereotypes for printing, customers are aware, there is little risk to the quality, safety or legality, as the artwork, once produced, has to be approved by the customer before the stereotypes are made for the product to be printed. Records of this approval are kept. All sub-contracted process materials are used by the company and not released to the customer from anywhere else.</p>
3.8	Management of suppliers of services
	<p>The company purchase services for pest control, couriers and waste management. There is no separate documented procedure covering the approval and monitoring of suppliers of services. <b>This was recorded as non-conformity no. 2. (3.8.1).</b> Documented contractual agreements are in place for these suppliers namely, Prokill (Pests), Atlas Couriers and TML (Waste Management).</p>
3.9	Traceability
	<p>Section 8 of Quality &amp; Hygiene Policy Manual covers Product Identification &amp; Traceability. Traceability is via the company Works Order number 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 traceability system is formally tested at least one annually, it was done as a result of a customer complaint and on this occasion it was with CSO133710 (sales order) for CWO233357 for SR Techniques, the raw material was purchased on CPO319451 (purchase order) and the raw material spec was CPL524193. The issue was the wrong board grade being supplied and the traceability test allowed the raw material batch to be highlighted.</p>
3.10	Customer focus and contract review

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	<p>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.</p>
3.11	Complaint handling
	<p>Complaints are handled in line with Procedure 3.11.1 Customer Complaints, Issue 1, 2009-09-03. 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.</p> <p>52 Internal and External complaints raised in 2016 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 the current pallet strap and wrap line which resulted in a capital investment of a new pallet strapping and wrapping line.</p>
3.12	Management of product withdrawals, and incidents and product recalls
	<p>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 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 &amp; customers have contact telephone details of Sales Area Managers &amp; appropriate Business contacts for out of hours situations. Mock Product recall carried out with Lizzies Food, Job CWO22563, materials ordered from Smurfit on PO 315875, delivered to site on 2 pallets 2015-11-20. 2 batches of 1500 delivered to Lizzies on 2015-11-24 &amp; 2015-12-22. Lizzies confirmed product was there and quarantined. An operational quarantine system is in place to control non-conforming product to prevent delivery until released, for use or destruction, by senior managers.</p>
Non-applicable clauses	

4.	Site Standards
4.1	External standards
	<p>The site is in a self-contained 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.</p> <p>The roller shutter doors to the main goods-in/goods out bay and the roller shutter door on the baler remain open throughout the day when not in use.</p> <p><b>This was recorded as non-conformity no. 3 (clause 4.1.3).</b></p> <p>External drains have covers in place to prevent entry of pests.</p> <p>The external storage of raw materials is not required or possible due to the nature of the raw materials.</p>
4.2	Building fabric and interiors
	The internal walls, floors and suspended ceilings are kept in a good condition, light in the production area

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	are sleeved to protect product and machines against glass fragment in the case of breakage, with the same on flying-insect control devices, the lighting levels was found to be suitable and sufficient for a safe working environment. Suitable and sufficient ventilation is provided.
4.3	Utilities
	Water is provided via the mains and is used for domestic type purposes and not in the process, Compressed air is from maintained compressors which have filtered lines that provide air to the production machinery.
4.4	Security
	A risk assessment has been carried out for security ref Doc No 3 Security Risk Assessment issue 1 dated 2016-01-21 and is scheduled to be done again in January 2017. Access is through the main entrance for all employees and visitors and a reporting system is in place ref "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 are backed up on a daily basis and taken off site.
4.5	Layout and product flow
	<p>A site plan has been produced that shows;</p> <ul style="list-style-type: none"> <li>• Personnel access points</li> <li>• Travel routes</li> <li>• Staff facilities</li> <li>• Process flow</li> <li>• Storage areas</li> </ul> <p>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.</p>
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 commissioned by the supplier before being used by the company. A new Eterna PE1620SA diecutter and Mosca pallet strapping and wrapping line was installed in the last 12 months and are both in full operation.
4.7	Maintenance
	<p>A preventative maintenance program is in place for all machinery. This is managed by Anthony Murphy, Site Engineer. Examined monthly records for Eterna Diecutter 2016-11-16 and includes line clearance on machine before handing back to production signed by A. Murphy.</p> <p>Engineering workshops are controlled to minimise the risk of contamination, with swarf mat in place to prevent debris from entering the production area.</p> <p>Temporary Engineering in form of tape across the side panel door was seen on Eterma Diecutter, this was not recorded on a temporary Engineering Log.</p>

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	<p><b>This was recorded as non-conformity no. 4.</b> If contractors are used the Production Supervisors will supervise them throughout their stay.</p>
4.8	Housekeeping and cleaning
	<p>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 2016-12-03 completed by K Kryszstof, the records were completed satisfactorily. Cleaning chemicals are stored in a cupboard away from the production area.</p>
4.9	Product contamination control
4.9.1	Glass, brittle plastics, ceramics and similar materials control
	<p>Glass and brittle plastics 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.</p>
4.9.2	Sharps control
	<p>A procedure is in place for the control of knife cutting blades and sharps control, Number 5.7.11, 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. Last issued knife was ID No. KBS33 issued to Alex Karpawal on 2016-08-26 and was signed out on issue. Date of when sharps are removed are also shown, if an employee no longer requires the item or leaves the company or has it replaced. Snap off blades are not permitted on site.</p>
4.9.3	Chemical and biological control
	<p>All non-production chemicals are stored away from the production areas, A 25kg container of Ionised Water for use with the FLT batteries was seen in the warehouse with an additional unmarked container adjacent containing clear liquid. There was no COSHH datasheet available onsite for the chemical. <b>This was recorded as non-conformity no. 5.</b></p>
4.10	Waste and waste disposal
	<p>Waste water 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. Substandard trademarked material is destroyed as part of the baling process and is then collected for recycling.</p>
4.11	Pest control

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	<p>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 2016-11-18, where no internal activity was found or significant insect activity but some rat activity was found at the external baits no 2 and 3 as detailed on Pest Control Report for Contract No C191882/C19883 by Pest Consultant K. Garland.</p> <p>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.</p> <p>There is a site plan showing external bait traps (4 No.), internal baits (29 No.), fly killers (5 No.).</p> <p>All Pest Control Safety Data Sheets are present in the Pest Control folder, e.g. Bromadiolone (Jade Block).</p> <p>Prokill are a member of the British Pest Control Association number M15/737, valid until 28<sup>th</sup> Feb 2017.</p>
Non-applicable clauses	4.11.3

5.	Product and process control
5.1	Product development
	<p>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.</p>
5.2	Graphic design and artwork control
	<p>All graphic designs are received from the customer and sent to RED32 the sub-contracted company to produce the design, this is returned to the company who send it to the customer 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.</p> <p>All stereos produced by RED32, artwork contractor hold an identification label that details the job specification, e.g. CPL519310/A for EGL Homecare Ltd (customer).</p> <p>There is no documented artwork procedure which covers the process steps including how information is collated for artworks, how received and how verified and approved by the customer.</p> <p><b>This was recorded as non-conformity no. 6.</b></p>

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5.3	Packaging print control
	<p>A system of start-up checks is in place to ensure that there is no loss of information. Printing stereotypes 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 case maker, any print errors noticed are corrected and any non-conforming product destroyed.</p> <p>Composite printing is not carried out on site.</p> <p>Samples are retained at the machines for reference for 48 hours as well as CAD drawings and Abaca process check records kept indefinitely.</p>
5.4	Process control
	<p>Process Control is covered by procedure No 5.2.1 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), dated 2016-01-23, Issue 2. 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.</p> <p>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.</p>
5.5	Calibration and control of measuring devices
	<p>It is not necessary to calibrate equipment as products are made to tight 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.</p>
5.6	Product inspection, testing and measuring
	<p>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.</p> <p>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 once per year.</p>
5.7	Control of non-conforming product
	<p>Procedure in place Control Of Non-Conforming Product ref 5.6.1 is in place in the form of a process flow chart.</p> <p>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</p>

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	action is implemented and documented to avoid recurrence e.g. Complaint Number 7086 for Cole & Son (Customer) raised on 2016-11-15, complaint was that print was not centred correctly. Action taken was checked remaining stock, collect the non-conforming product and root cause analysis is currently sitting with Production Director for follow up. Incident 7798 resulted in corrective action for changing the method of strapping the product using 4 way strapping.
5.8	Incoming goods
	Incoming goods are received and inspected in accordance with procedure 5.2.1 Appendix A-1. Raw materials are received from three main suppliers (Jardin, Smurfit and On Board) 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 the relevant area of the warehouse area ready for production to use.
5.9	Storage of all materials and intermediate and finished products
	All materials is 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. 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. 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 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.
Non-applicable clauses	5.3.5, 5.5

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.  Induction training records for Anthony Murphy who started in last 12 months, carried out in 2016-03-15 on

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first day, by Mark Bennett (Production Manager). Employee trained in Hygiene and Quality Awareness on 2016-04-20. Training covered Working Area, Machine authorisation, Ethical trading and Medical information. Record is signed by the employee.  
 Training Record for Craig Pauley (Diecutter Supervisor) shows he has authorisation to operate Large Eterna, record from 2015-09-23, training by Mark Bennett (Production Manager). This includes all aspects of operating the machine and product quality and hygiene checks.

6.2	Personal hygiene
	<p>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.          An operator on the slotter machine was seen wearing a watch during the production facility inspection.  <b>This was recorded as non-conformity no. 7.</b>          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.</p>
6.3	Staff facilities
	<p>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, however 2 liter plastic water bottles with screw caps were in use, adjacent to the new Large Eterna diecutter.  <b>This was recorded as non-conformity no. 8.</b></p>
6.4	Protective clothing
	<p>Company issued protective garments consist of 3 x Polo shirts, trousers &amp; t Shirts that are suitable &amp; 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.</p>
Non-applicable clauses	

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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	

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