

Cumberland Packaging Ltd

HAZARD ANALYSIS STUDY REPORT

Date of assessment: 3rd September 2009

Review date (1) :

Review date (2) :

Review date (3) :

Approved By	Mr. J. Watson
Signature	
Position	Managing Director
Approval Date	
Issue number	One (1)

Terms of reference

The HACCP study covers all products manufactured at the Cumberland Packaging Ltd site and has been conducted in accordance with the manufacture and supply of corrugated packaging products intended as a packaging medium for indirect food contact by the customer.

The aims and objectives of the organisation is to gain accreditation of the BRC/IoP Global Standard for Packaging and packaging materials Category 2 issue 3, 2008

The study covers all processes from Contract/specification review through to delivery of finished product to the customer. For each process step every effort has been made to identify all potential hazards to consumer safety, product integrity, which are goods that are of a standard of quality that is fit for purpose and legality and in turn appropriate control measures have been established to minimise their risk.

The food and hygiene sensitive safety hazards considered by the study are microbiological, foreign objects and chemical contamination, as well as possible packaging defects critical to consumer safety.

All elements of the HACCP study have been carried out by the following HACCP Team;

- | | | | |
|----|-------------------|-------------------------------------|--------------------------------|
| 1) | Mr. M. Bennett | Production Manager | (Authorised HACCP Team Leader) |
| 2) | Mr. J. Watson | Managing Director | |
| 3) | Mr. P. Strzelszyk | Production Operative | |
| 4) | Mr. C. Watson | Production Operative | |
| 5) | Mr. Gareth Jones | Management System Support Provider. | |

The HACCP Team will review the HACCP Study annually in accordance with the requirements of the company's management review meeting and or following significant changes to the process or product range supplied to the customer.

Product description and intended use

Cumberland Packaging Ltd manufacture and supply corrugated packaging products that are used by our customers to provide a secondary packaging medium to their products.

The products are supplied in flat form and are identified with the product details for trace ability purposes should the need arise. We ensure our suppliers provide appropriate and documented certification to demonstrate conformance to current legislation.

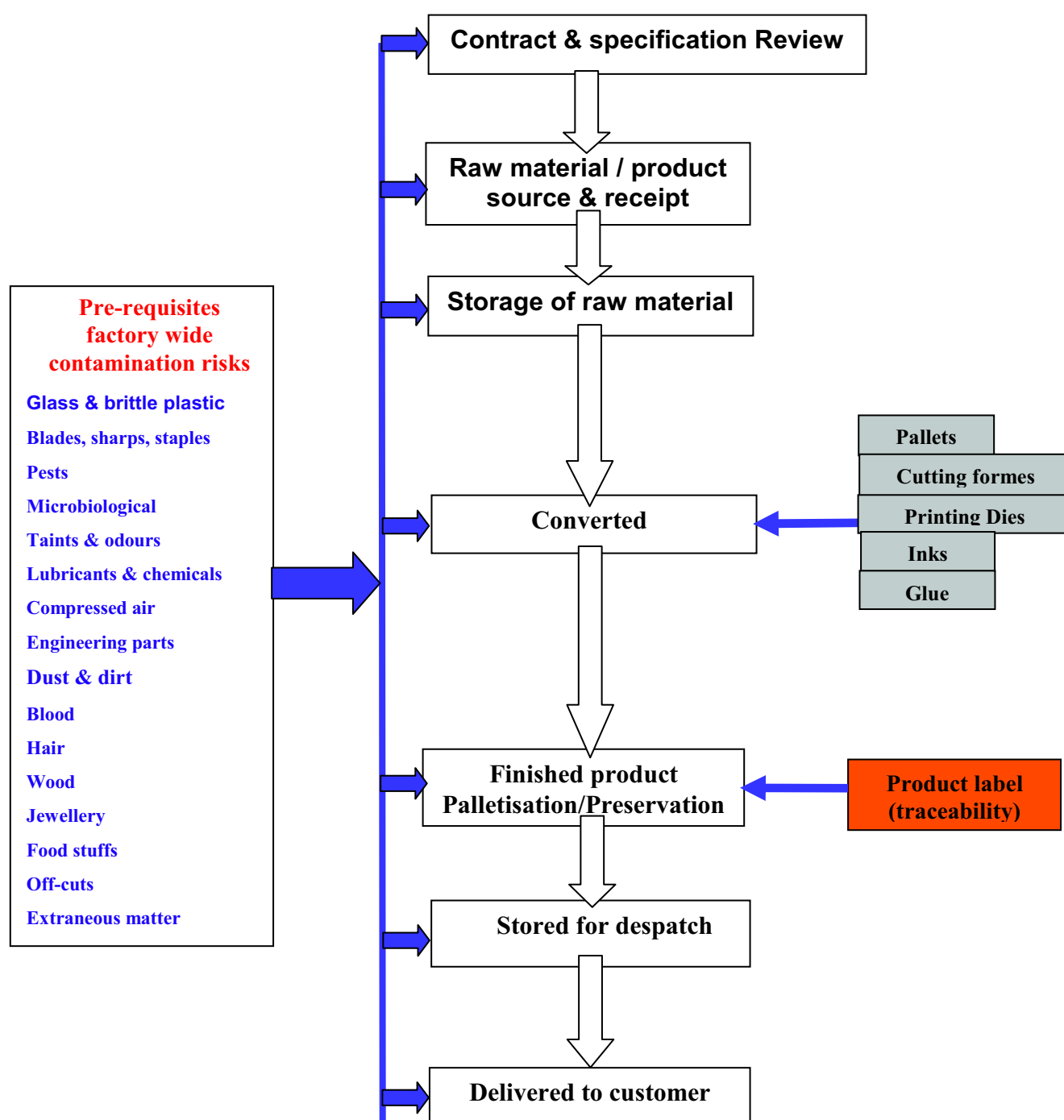
Cumberland Packaging Ltd classify our products as low/medium risk as they are not used in direct contact with food and other hygiene sensitive products.

Any contamination of the product which could be transferred to the customers product or may pose a risk to end users is extremely important therefore that we identify all potential food safety hazards throughout our manufacturing process and implement appropriate control measures.

Process flow diagram

The process flow diagram details the process steps and prerequisites of the production process from specification and contract review to delivery of finished product to the customer.

Process controls ensure products meet customer requirements.



Process flow verification / change log

The HACCP team has agreed the food safety hazards associated with each process step. The HACCP study and the control and monitoring measure will be reviewed at least annually and or following a significant process change. All amendments are recorded on the following verification form.

Date	Amendment	Signature

APPROVED BY: Mr. J. Watson
(Managing Director)

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Pre-requisites food safety hazards

Foreign Objects And contaminants:

- Blades / Sharps / staples
- Off-cuts and other product related waste
- Blood/Bodily fluids
- Taints & odours
- Glass, brittle plastic or ceramic
- Compressed air
- Wood
- Soil
- Pests (rodents, mice, birds)
- Insects
- Jewellery and other personal items
- Hair
- Food stuffs
- Extraneous matter

Chemicals

- Oil
- Cleaning materials
- Grease
- Glue
- Solvents

Hazard analysis - risk to product safety and integrity

L = Likelihood of the Occurrence

3 = High
2 = Medium
1 = Low

S = Severity of the Outcome

3 = High
2 = Medium
1 = Low

R = Risk Level (L x S)

1-3 = Low risk (establish control measures where appropriate)
4-6 = Medium risk (establish control measures)
9 = Substantial risk to integrity (Critical Control Point)

Hazard Analysis							Manual / Reference Document
Process Step	Hazard	Type	L	S	R	CC	
<i>Analysed in the table are the pre-requisite contamination and allergen hazards that may be present throughout the manufacturing process.</i>	Glass and brittle plastics	F	1	3	3	NO	Glass and brittle plastic control procedure Part 2, section 9. (procedure 5.7.2)
	Blades/Sharps and Staples	F	2	3	6	NO	Knives & Blade control procedure Part 2, section 10. (procedure 5.7.11)
	Pests	M	1	2	2	NO	Pest control surveillance records & action reports Part 1, section 19
	Personnel	F/M/ C	1	2	2	NO	Hygiene Code of Practice Part 1, section 14. (1.1 to 1.6 Inclusive)
	Dust, dirt and compressed air	F/M/ C	1	1	1	NO	Hygiene Code of Practice Part 1, section 16 & 17
<i>The hazards detailed are not process specific and are controlled by essential factory wide procedures.</i>	Wood splinters	F	1	1	1	NO	Contamination control Part 1, section 9.
	Hairs	F/M	1	1	1	NO	Hygiene Code of Practice Part 1, section 14, page 2, (1.4.b)
	Blood & B.F.	M	1	1	1	NO	Hygiene Code of Practice Part 1, section 14, page 1 (1.2)
	Foodstuffs	F/M	1	1	1	NO	Hygiene Code of Practice Part 1, section 14, page 1, (1.6.1 & 1.6.2)
	Jewellery and personal items	F	1	1	1	NO	Hygiene Code of Practice Part 1, section 14, page 2 (1.5)

CCP = Critical Control Point

F = Foreign Body hazard

M = Microbiological hazard

C = Chemical hazard

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Hazard Analysis						
Process Step	Hazard	Type	L	S	R	CC
<i>Raw material / Product / source & receipt</i>	Poor handling and hygiene controls at suppliers	F/M/ C	1	1	1	NO
	Contaminated deliveries	F/M/ C	1	1	1	NO
Process Step	Hazard	Type	L	S	R	CC
<i>Storage of raw material</i>	Inappropriate/poor handling and hygiene controls in Stores	F/M.	1	1	1	NO
	Contamination caused by poor handling and hygiene controls in Stores	F/M	1	1	1	NO
Process Step	Hazard	Type	L	S	R	CC
<i>Unpacked for production</i>	Contamination caused by poor handling and hygiene controls in Stores	F/M	1	1	1	NO
	Contamination caused by poor handling and hygiene controls in Stores	F/M	1	1	1	NO

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Hazard Analysis						
Process Step	Hazard	Type	L	S	R	CC
<i>Raw material converted into the finished product</i>	Product contamination in machine set-up caused by poor equipment controls	F/C	1	1	1	NO
	Contamination during board manufacture and conversion caused by poor hygiene and process inspection controls.	F/M/ C	1	1	1	NO
	Contamination of finished product caused by packaging/wrapping	F/M/ C	1	1	1	NO
	Contamination caused by poor palletisation and handling controls	F/M/ C	1	1	1	NO
<i>Finished Product palletisation, Identification & preservation</i>						
THIS SECTION IS INTENSIONALLY BLANK						
		Control Measures		Manual Reference Document		
		Ensure setting tools and associated equipment are removed and placed in the designated and safe area on completion of machine set. Carry out visual checks on a regular basis.		Hygiene Code of Practice Part 1, section 18, page 2. (5.5.9 a & b)		
		Ensure physical and visual quality and hygiene inspections are carried out in accordance with documented criteria. Maintain GMP and hygiene culture at all times. Report defective equipment/product or incidents of contamination/poor quality and product safety concerns in every instance. Ensure cutting formes, printing dies etc are in sound condition at all times (prior to and after use)		Process control, inspection and test. Part 2, section 7. (procedure 5.2.1) Contamination control Part 1, section 9. Control of non-conforming products Part 2, section 8. (procedure 5.6.1)		
		Carry out visual inspections of product packaging/wrapping at clearly defined intervals		Process control, inspection and test. Part 2, section 7. (procedure 5.2.1)		
		Ensure that the product is adequately protected from the environment and is free from contamination and strapping damage. Ensure that customer palletisation and protection specifications are adhered to at all times. Ensure the pallet/product label is attached		Process control, inspection and test. Part 2, section 7. (procedure 5.2.1) Finished product inspection and test procedure.		

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Hazard Analysis						
Process Step	Hazard	Type	L	S	R	CC
<i>Storage of finished product</i>	Contamination caused by poor handling and hygiene controls in finished goods stores	F	1	1	1	NO
Process Step	Hazard	Type	L	S	R	CC
<i>Transportation of finished product</i>	Generic contamination caused by poor handling and hygiene controls of delivery vehicle trailer.	F	1	1	1	NO
Process Step	Hazard	Type	L	S	R	CCP
<i>Contractor/ Employee (inc temp workers). Servicing, Maintenance, and Repair.</i>	Contamination caused by lack of controls with regard to due diligence and safety.	F/M/C	1	1	1	NO
Process Step	Hazard	Type	L	S	R	CCP
<i>Drivers/ Visitors. Conduct whilst on site</i>	Lack of regard to due diligence and safety.	F/M/C	1	1	1	NO

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Process Step	Hazard	Type	L	S	R	CC	Control Measures	Manual Reference Document
<i>Storage of finished product</i>	Contamination caused by poor handling and hygiene controls in finished goods stores	F	1	1	1	NO	Ensure that all finished product remain in original and appropriate packaging until released for delivery. Ensure that the stores department cleaning schedule is applied and external doors are kept closed when not in use	Contamination control Part 1, section 9. Hygiene Code of Practice Part 1, section 16, (3.1.1 to 3.8.1 Inclusive) & Part 1, section 17, page 2. (4.4.8)
<i>Transportation of finished product</i>	Generic contamination caused by poor handling and hygiene controls of delivery vehicle trailer.	F	1	1	1	NO	Ensure that the trailer is inspected for odour, damp or contamination prior to and after each delivery. Ensure that trailer curtains are free from damage prior to and after each delivery. Ensure that all personal hygiene rules are applied	Contamination control Part 1, section 9.
<i>Contractor/ Employee (inc temp workers). Servicing, Maintenance, and Repair.</i>	Contamination caused by lack of controls with regard to due diligence and safety.	F/M/C	1	1	1	NO	Ensure that contractor duties are adhered to at all times. Supervise activities and apply strict control measures. Ensure that all personal hygiene and site rules are applied and adhered to.	Maintenance staff/Contractor duties Part 1, section 18, page 2. (5.5.8) Interviews and induction to all new employees and agency personnel. In accordance with good personnel practices Part 1, section 7
<i>Drivers/ Visitors. Conduct whilst on site</i>	Lack of regard to due diligence and safety.	F/M/C	1	1	1	NO	Ensure that Drivers/Visitors are made aware of their responsibilities whilst on site. Supervise activities and apply strict control measures. Ensure that all personal hygiene and site rules are applied and adhered to.	Hygiene/safety information leaflet issued in every instance and reviewed with management Part 1, section 9, page 4