Audit Report

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

1. Audit Summary			
Company Name:	Cumberland Packaging	Site name:	Shoeburyness
Audit Category:	**Low Hygiene Risk**	BRC Site Code:	4477975

2. Results			
Audit Result:	**CERTIFICATED**	Audit Grade:	A
		Audit Frequency :	12 months

3. Audit Details			
Audit Start Date:	2015-01-08	Audit Finish Date:	2015-01-08
Re-audit Due Date:	2016-01-06	Previous Audit Date:	2013-12-20
Auditor Number (one only : team leader)		Auditor Names	
110004		B T Peckett	

4. Scope Details	
Packaging Field:	
02 - Paper	
Select a packaging field	
Select a packaging field	
Select a packaging field	
Scope of Audit:	The conversion & sales of corrugated diecut fibre board, multipoint gluing into cases, trays, inserts & 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 & electrical items
Exclusions from Scope:	None
Non-applicable clauses:	
4.1.6; 5.2.6; 5.4.5; 5.5, 5.6	
Products in production at the time of the audit:	
Plain and printed corrugated cartons and fitments	

5. Company Profile

John Watson, the Managing Director reports a steady year with good business orders and no significant downturns. The Company was established in 1985 and produces die cut printed and plain corrugated boxes, and polystyrene packaging for void fitments in corrugated. They manufacture the products for a variety of industry sectors including food and pharmaceuticals. There is no particular bias of any industry sector; around 20% of products made are for food.

The site has ten machines in total which includes a case maker with two colour printing stations, crease and cutting machinery as well as the necessary ancillary equipment. The manufacturing facility and storage areas total 5295 m². The Company employs 48 people with max 30 on site at any one time. The site holds Investors in People and is an NVQ approved training centre for fibreboard conversion level 2, and also holds an award issued by the Sheet Plant Association.

There have been no changes to products, processes or machinery since the last assessment. There is management commitment and expansion plans to ensure the site realizes its capability. The company has an integrated Quality and Hygiene Management system with procedures and systems that are in compliance to meet the requirements of the BRC Global Standard For Packaging & Packaging Materials.

6. Non-Conformity Summary

Summary of Non-Conformity Raised

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

Critical

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

Major against SOI of a Fundamental Clause

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

Major

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

Minor

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

7. Company Details

Company Name : Cumberland Packaging Ltd

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

8. Key Personnel

Name/Job Title	Present at Audit (x)			
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
John Watson, Managing Director	X	X	X	X
Chris Monaghan, Production Director		X	X	
Steve Weir, Transport Manager		X		
Malcolm Fairman Design Manager			X	

9. Audit Duration Details

On-site audit duration 8 Man Hours

Duration of production facility audit 3 Man Hours

Reasons for deviation from typical (12 hours) or expected on-site audit duration or typical (3 hours) site inspection duration.
Compliant with PO 51 30 persons on site & buildings occupy 5295 m².

10. Audit Duration per day

	Start time	Finish time
Day 1	0900	1700

Detailed Audit Report

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

1. SENIOR MANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT

1.1 Product Safety and Quality Management System

SOI	The senior management shall commit the company to producing products to the specified quality and which are safe and legally compliant.	Y	There is a product safety & Quality Management policy statement in place inclusive of commitment to product safety, legal & regulatory requirements. It is dated 2.2.2012 and is signed by John Watson, the Managing Director. The policy is reviewed 4 times annually during the main reviews. No changes have been necessary since 2012. The policy is displayed on site notice board and included within the company QMS systems. The policy is reviewed within a 12 month cycle as part of the management review process at site. There is also a commitment in the policy to continual improvement established by targets & objectives with employee participation.

	1.1.1	Y	1.1.2	Y	

1.2 Senior Management Commitment — FUNDAMENTAL

SOI	The company's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging and Packaging Materials. This shall include provision of adequate resources, effective communication and systems of management review to effect continual improvement. Opportunities for improvement shall be identified, implemented and fully documented.	**Y**	
1.2.1	The company's senior management shall ensure that product safety and quality objectives are measurable, established, documented, monitored and reviewed.	**Y**	Company aims & objectives are derived and included in the company Annual Business plan with KPI targets and values allocated accordingly to the various tier levels that includes. Ensuring Labour indicator is satisfactory Ensuring Customer satisfaction at 85% OTIF at 92% Reduction in waste material Reduction in customer complaints target 2014 0.75% actual YTD 0.39% Maintain BRC IOP certification Managing Director John Watson & Chris Monaghan Production Director conveyed company commitment and plans during site opening & closing meetings and during the site tour. The team review the business plan on a quarterly basis to ensure targets are being realized.
1.2.2	The company's senior management shall have a system in place to ensure that the company is kept informed of all relevant legislative, scientific and technical developments, and industry codes of practice applicable in the country manufacture and, where known, the country in which the packaging material will be sold.	**Y**	The company is kept informed of relevant legislation and scientific developments by the Sheet Plant Association. Packaging manufacture is for indirect secondary packaging cartons & fittings that is not in direct contact with foodstuffs. Essential packaging regs re heavy metals, packaging waste regs. The products produced are used exclusively in the UK; but if needed they are compliant for EU distribution.

1.2.3	The company shall ensure that the materials manufactured comply with the relevant legislation (including any legislation concerning the use of recycled content) in the country of manufacture and in which the products are intended to be sold and/or ultimately used, where known.				**Y**	Raw material paper stocks are procured from industry recognised suppliers in the EC and have declarations of compliance demonstrating that they comply with Regulation 94/62/ EC re heavy metals. Secondary packaging medium indirect food contact. There are statement s re recycled content may be up to 100% dependant on paper grade & application. This is entirely with customers knowledge and approval.
1.2.4	The company's senior management shall ensure that non-conformities identified at the previous audit against the Standard are effectively actioned.				**Y**	Four minor NCR's raised at last audit cleared within 28 day period via document review & photographic evidence, confirmed as cleared out at this evaluation.
1.2.5	The company shall have a current, original copy of the Standard available on site.				**Y**	Copy of current standard issue 4 viewed during evaluation held by John Watson Managing Director hard copy version
1.2.6	Where the company is certificated to the Standard they shall ensure that recertification audits occur on or before the audit due date indicted on the certificate.				**Y**	Company aware of timeframe requirement; evaluation conducted 2 days later than scheduled date due to problems matching diaries.
1.3 Organisational structure, responsibilities and management authority						
SOI	The organisational structure shall be clear, with defined responsibilities, and key staff shall be aware of their responsibilities with regard to packaging safety and quality.				**Y**	The management organisational structure is documented within the QMS manual and on the company web site Organisational structure dated 9.10.2013 Version 2. This has not changed but was reviewed recently without requiring amendment on 07/01/2015. The Managing Director is the Designated Hygiene Manager and the Production Director is the Deputy Hygiene Manager as ref in section 5 of manual
	1.3.1	Y	1.3.2	Y		
1.4 Management review						
SOI	Opportunities for continuous improvement of the product safety and quality programme shall be identified and effectively implemented through management reviews of the product safety system and results.				**Y**	The management review is conducted on a quarterly basis. Management review carried out 07.01.2015. Minutes of meetings cover standard requirements, and are attended by senior management team members. John Watson reports that the system of reviews is an invaluable Management tool. John Watson Managing Director Chris Monaghan Production Director Mark Bennett Production Manager Janet Monaghan Accounts Manager Paul Hammans Administration Manager Steve Weir Transport Manager Malcolm Fairman Design Manager The management review process reviews & evaluates progress of system functionality, adjustments are made accordingly to ensure KPI and objectives are achieved as planned.
	1.4.1	Y	1.4.2	Y		
	1.4.3	Y				
2. HAZARD AND RISK MANAGEMENT SYSTEM						
2.1 Hazard and risk management team						
SOI	The hazard and risk management system shall be managed by a multidisciplinary team competent in hazard and risk analysis.				**Y**	The hazard risk team comprises of the Managing Director, Production Manager, and two Production Operatives. The Team leader is the MD. Training was done by an external consultant from a company called "Scope Business Systems Management Services" and the hazard and risk was developed in 2009.
	2.1.1	Y				

2.2	Hazard and Risk Analysis	FUNDAMENTAL	
SOI	The company shall establish the effectiveness of its prerequisite programmes through a hazard and risk analysis and identify and implement any further risks to the safety and legality of products.	Y	
2.2.1	The scope of the hazard and risk analysis shall be clearly defined and shall cover all products and processes included within the intended scope of certification.	Y	The company has carried out a Hazard analysis in accordance with the requirements of this standard, section 2. The study was carried initially out 14.9.2009 & reviewed quarterly annually for suitability last review 07/01/2015. The scope covers all products manufactured in accordance with The conversion & sales of corrugated diecut fibre board, multipoint gluing into cases, trays, inserts & 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 & electrical items. The analysis covers all potential hazards and contamination sources within the process inclusive of allergens, taint and odour, & component transfer. The study is inclusive of risk assessments employing a 3 x 3 matrix rating system for evaluating hazards & identification of CP, CCP's & prerequisites. The prerequisites and QMS work instructions maintain product integrity to produce a safe and legal product meeting customer requirements. Low Hygiene Risk Category established / referenced by use of determination tree page 12 of issue 4. Some cartons are used for high risk food products that have primary packaging; the cartons may enter high care packer filler halls. There is no ink printed on the inside surface of the box. This is detailed in the analysis which is entirely suited to site manufacturing activities.
2.2.2	The hazard and risk analysis team shall maintain awareness of and take into account: · historical and known hazards associated with specific processes, raw materials or end use of the product · relevant codes of practice or recognised guidelines · legislative requirements.	Y	The team are aware of typical and historic hazards from their experience in the industry dealing with corrugated fibreboard and their customer base in various industries. Codes of practice for corrugated FEFCO European Federation of Corrugated Board Manufacturers and is the umbrella organization of the European Corrugated Board Industry. Company a member of Sheet Plant Organisation.
2.2.3	A full description of the packaging produced by product or product group and its intended use shall be documented.	Y	The scope defines the products {The conversion & sales of corrugated diecut fibre board, multipoint gluing into cases, trays, inserts & 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 & electrical items} which are used by customers to provide a secondary transit packaging medium to protect & promote the sale of their products.

2.2.4	A process flow diagram shall be prepared for each product, product group or process. This shall include each process step from the receipt of raw materials to despatch to the customer. The process flow shall as a guide include, as relevant: · receipt and approval of art work · receipt and preparation of raw materials such as additives, inks and adhesives · each manufacturing process step · the use of rework and post-consumer recycled materials · any sub-contracted operations · customer returns. The accuracy of the process flow shall be verified by the hazard and risk analysis team.	**Y**	A well defined flow chart is in place that defines all process steps: These include: Contract & Specification review Design inclusive of artwork & CAD Purchase & receipt of raw materials Goods inwards inspection & storage Board storage Conversion & printing of sheet fibreboard Die cutting Gluing Stitching Palatisation Banding & wrapping Storage on site Loading & transport – despatch to customer Processes shown via a process Hazard evaluation in HACCP study & via flow chart, verification of the process by the hazard and risk management team & consultant Gareth Jones. Recycled materials in products up to 100% content utilised in process dependant on paper grades & application; detailed on supplier's raw material specifications. Additional materials in the process being Inks & PVA adhesives are water based. Storage conditions referenced as ambient.
2.2.5	The hazard and risk analysis team shall identify and record all potential hazards that are reasonably expected to occur at each step in relation to the product and process The hazards considered shall include, where relevant: · foreign objects · chemical contamination (e.g. taint, odour, allergen, component transfer from inks, varnishes and glues) · hazards that may have an impact on the functional of the final product in use.	**Y**	The hazard and risk assessment evaluation of potential hazards; Chemical, physical, microbiological, allergens, component transfer and defects. Physical hazards include foreign body contamination and out-of specification product. The plan identifies Zero CCP's inclusive of microbiological hazards managed by 16 prerequisite & QMS procedure controls. Defects & out of specification products are managed by the quality control procedures. The process is relatively simple, printing & conversion of sheet fibreboard into cartons or cases and fittings; finished product palletisation & pallet wrapping.
2.2.6	The hazard and risk analysis team shall identify control measures necessary to prevent, eliminate or reduce each hazard to acceptable levels.	**Y**	The company risk analysis has evaluated the potential hazards in the operation via a traditional HACCP question and evaluation rating process with hazards identified as Low risk. The identified hazards have been accessed to define the impact on the process and appropriate control measures implemented accordingly Zero identified Critical Control Points in process.
2.2.7	For each hazard that requires control, the control points shall be reviewed to evaluate if existing prerequisites are effective in providing control. Where greater controls are required to the prerequisite programmes, improvements shall be implemented to ensure control is achieved.	**Y**	Identified hazards are controlled by quality procedures & work instructions; they are included in the internal audits and monitored for effectiveness accordingly. They are supplemented by the 16 prerequisite controls in place. Pest control, personal hygiene, blades & sharps, glass & brittle plastic control, maintenance, quality assurance, etc. The fact that the company have received no hygiene or foreign body complaints at all over the last 12 months is testament to the efficiency of the system.

2.2.8	A review of the hazard and risk management system shall be carried out at least once per year and following any significant incidents or when any process changes. The review shall include a verification that the hazard and risk analysis plan is effective and may include a review of: · complaints · product failures · recalls · product withdrawals · results of internal audits of prerequisite programmes · results from external third-party auditors.	**Y**	HACCP reviews take place quarterly or when changes occur. The team review all aspects of study and document findings. QMS procedures Internal Audits twice annually and PRP's monitor the identified risks. Internal audit schedule 2014 up to date. System review & verification 07/01/2015.In addition the quarterly management reviews takes into account the current situations as opportunities for improvement.

2.3 Exemption of requirements based on risk analysis

SOI	The site has demonstrated adequate compliance with the requirements of this clause.			**Y**	The hazard and risk is fully supported by the pre-requisite programs in place, and there are no exemptions to the standard
	2.3.1	Y	2.3.2	Y	

3 PRODUCT SAFETY AND QUALITY MANAGEMENT SYSTEM

3.1 Product safety and quality manual

SOI	The company shall have a manual that describes how the requirements of the Standard are met. These requirements shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary.			**Y**	The company have a QMS management system that consists of a Hygiene Quality & GMP manual issue 4 dated 3rd[h] 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.
	3.1.1	Y	3.1.2	Y	

3.2 Customer focus and contract review

SOI	The company shall ensure that customer needs and expectation with respect to quality and safety are identified and met, and that communication channels are clear.			**Y**	Customer requirements and needs are identified via the internal and external sales team. The measure used to see if customer requirements have been met is via the use of a web based computer system. The company has continued to exceed their target for customer satisfaction.
	3.2.1	Y			

3.3 Internal audits				FUNDAMENTAL
SOI	The company shall establish through a programme of internal audits that the implementation of the requirements of the Standard are in place, appropriate and complied with.		Y	
3.3.1	Internal audits shall be planned and their scope and frequency shall be established in relation to the risks associated with the activity. Audits shall be scheduled so that all aspects of the Standard are audited at least annually.		Y	The internal audits are planned and a schedule is in place covering all the areas. The audit plan for 2014 is in place ref H.S.A.S.1 “Hygiene And Quality Management Systems (Audit Schedule)” All audits were realised.
3.3.2	Audits shall be conducted by personnel who are competent, and sufficiently independent from the department being audited to ensure impartiality.		Y	Audits are conducted by the Production Manager, Sales Manager, MD, Sales Representative, Admin Manager, Transport Manager. All the members have had audit training from Scope Business Management Services
3.3.3	Deficiencies and details of non-conformities shall be notified to appropriate supervisory staff and corrective action implemented within a specified and appropriate time period.		Y	Minor non conformances have been raised at the audits that highlight deficiencies in the requirements to meet the standard. These deficiencies are rectified by dept leaders overseen by appropriate manager the findings are reviewed in quarterly management review meetings.
3.3.4	The completion of corrective action shall be recorded and verified.		Y	Actions carried out from any noted deficiencies are documented and tracked through to completion by controlled by Production Director. Overview of findings reviewed at monthly operations meetings. All findings are detailed & retained accordingly.
3.3.5	Conformity as well as non-conformity shall be clearly identified and verified within the internal audit report.		Y	Both good practice & non conformities noted on selection of audit reports. All aspects done 4 times per year. Management Commitment. March by Jody Adams. Product specification and traceability. March by Mark Bennett. Customer complaints March John Watson. Positives and negatives identified.
3.4 Supplier approval and performance monitoring				
SOI	The company shall ensure that suppliers of goods and services are operating in a manner that ensures that product quality and safety is not compromised and specifications can be achieved.		Y	There is a documented supplier approval procedure in place Assessment of Suppliers and Contractors issue no 1 dated 3.9.2009 There is an assessment program ref Supplier/Sub-Contractor Register S.S.R.1 & supplier Questionnaire S.S.Q.1 As part of the assessment a company is checked to see if they are BRC/ISO certification etc. Performance monitoring via supplier complaint system Jardin Corrugated BMTrada to October 2015 The company only uses two suppliers for board, one for inks, two for stretch-wrap etc. Suppliers once approved are monitored on performance based on internal audits (rejects/claims/price). Smurfit kappa Norwich BRC certificated with BVQI.
	3.4.1	Y	3.4.2	Y
	3.4.3	Y	3.4.4	Y

3.5 Subcontracting of production					
SOI	Subcontractors shall be effectively managed to prevent any risk of contamination or damage and ensure product is produced to specification.			**Y**	In rare situations CRP (box manufacturer) make heavy duty triple wall boxes and CAPS Cases archive boxes are used to subcontract work. Both Companies have been approved as per clause 3.4. Both are BRC approved and have gone through the risk assessment process. Specifications are the same as the ones used by the company internally. Subcontracted goods are inspected in goods in prior to shipment to the customer.
	3.5.1	Y	3.5.2	Y	
	3.5.3	Y	3.5.4	Y	
3.6 Documentation control					
SOI	Documentation essential to the management and control of product safety, legality and quality shall be relevant, controlled and available, as the correct version, to the appropriate personnel.			Y	There is a document control procedure in place ref "Document Control", and is readily accessible by relevant personnel via MD hard copy or on the company server. Changes are controlled via "Policy Document Amendment Control Sheet". The issue number and date is updated.
	3.6.1	Y	3.6.2	Y	
3.7 Specifications				**FUNDAMENTAL**	
SOI	Appropriate specifications shall exist for raw materials, intermediate and finished products, and any product or service that could affect the integrity of the finished product.			Y	
3.7.1	Specifications shall be suitably detailed, accurate and shall ensure compliance with relevant product safety and legislative requirements.			**Y**	Specification made through ABBCA software. Examined specification for Millers Bakery Ltd. Specification number CPL513117/BP. Dimensions 600 x 500 x 130mm Board B Flute 150 white Kraft, inner lining 150 test material. 90% recycled.
3.7.2	The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed then the company shall be able to demonstrate that they have taken steps to put an agreement in place.			**Y**	Specifications approval processes with customer, bespoke specifications for the process are generated re design layout & artworks. Records are maintained on approval data base and updated accordingly.
3.7.3	Trademarks for application on packaging materials shall, where appropriate, be formally agreed between relevant parties.			**Y**	Art work approval as part of contract review process; via customer's artwork house. CAD facility samples are generated and sent for approval by customer. Viewed art work approval for Millers Bakery Ltd, Spec No CPL 513117/BP.
3.8 Record Keeping					
SOI	The company shall maintain records to demonstrate the effective control of product safety, legality and quality.			**Y**	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; the systems are backed up daily. Electronic record retention period being indefinitely on server. Hard copy records range from 6 to 36 months depending on record type.
	3.8.1	Y			

3.9 Traceability		**FUNDAMENTAL**	
SOI	The company shall have a system in place to identify product batches and to trace and follow all raw materials through processing to the distribution of the finished product to the customer. Records shall be retrievable in a timely manner.	**Y**	
3.9.1	An appropriate system shall be in place to ensure that the customer can identify a product or production lot number for the product for the purposes of traceability.	**Y**	Fibreboard stock materials are traced via incoming material barcodes that are scanned into Abaca Vision 3000 sites MIS system. On allocation to machines a bespoke Works order No. relating to customer order is allocated linked to sales order. The unique ref follows job throughout process / despatch. Material identity labels with spec reference are generated at conversion & finishing operations. The labels retain a works order No. ref which is retained on pallets of WIP and finished goods. Finished product is data imputed into warehouse & scanned out on despatch. Purchase reference PO of inks implementation for traceability.
3.9.2	The system shall be tested to ensure traceability can be determined from raw materials to the finished product and vice versa. This test shall take place at least annually.	**Y**	The system is tested on annual basis and is capable of being done from raw materials to finished product and vice versa as part of the product withdrawal & recall exercise. The company performs a trace every time a customer complaint is received. Traceability exercise and product recall test is currently underway today with European Safety Ltd, Customer Sales Order 118720 CPL S1S880. Date delivered 10/11/2014. Their PO No 1019451tss. Customer has confirmed that the materials are present and have been isolated pending pick up.
3.10 Complaint handling			
SOI	All complaints made by customers and consumers shall be recorded and investigated. Corrective actions where required shall be implemented and recorded.	**Y**	Complaints are recorded on a computer database via the complaints procedure and are all investigated. Corrective actions are discussed by senior managers and solutions implemented and monitored. All complaints are recorded by month and type e.g. gluing, printing etc. The site analysis of complaints is detailed & discussed as part of sites business management review process. The trend is for a continual reduction in complaints experienced over the last 10 years. Just 84 complaints in 2014. The primary cause was loading issues and corrective actions have been made to ensure their effective resolution.
	3.10.1	Y	
3.11 Management of incidents, product withdrawals and recalls			
SOI	The company shall have a plan and systems in place to effectively manage incidents and if required the withdrawal or recall of products, in order to ensure that all potential risks to the quality and hygiene and legality of products are controlled.	**Y**	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 & customers have contact telephone details of Sales Area Managers & appropriate Business contacts for out of hour's situations. Mock product withdrawal exercise with European Safety Ltd, Customer Sales Order 118720. CPL S1S880. Date delivered 10/11/2014. Their PO No 1019451tss. Customer has confirmed that the materials are present and have been isolated pending pick up. Managing Director supported by Operations Director being responsible for any recall or product withdrawal decision.
	3.11.1	Y	3.11.2	Y
	3.11.3	Y	3.11.4	Y

4. SITE STANDARDS

4.1 External standards

SOI	All grounds within the site shall be finished and maintained to an appropriate standard.				**Y**	The company is on a self-contained unit, and grounds are well maintained. The external building fabric is fairly new as it was re-clad, and no silos or pipes are used for raw materials. When the building was built a suitable drainage system was installed. Traffic routes are suitably maintained and office personnel turn into designated car park, and product carriers have to go into yard due to height restrictions placed for access into the car park.
	4.1.1	Y	4.1.2	Y		Raw materials are not stored externally.
	4.1.3	Y	4.1.4	Y		
	4.1.5	Y	4.1.6	N/A		

4.2 Building fabric and interiors

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

4.3 Utilities

SOI	Product cleanliness and integrity shall not be compromised by the location, construction and delivery of the utilities to and within the production and storage areas.				**Y**	Water is not specifically used in site process it is however occasionally added to inks; It is also utilised for cleaning purposes it is via mains supplies provided by Anglian Water it is of potable quality. Compressed air is utilised on machinery for operational control of ink pumps valves & cylinders that is dried & oil separated. LPG for fork trucks on site
	4.3.1	Y	4.3.2	Y		

4.4 Security

SOI	Product and process integrity shall be assured through appropriate site security provision.				**Y**	A risk assessment has been carried out for security ref CPL ISMS-Risk Assessment issue 1 dated 6/8\2012. Access is through the main entrance for all employees and visitors and a reporting system is in place ref “Visitors and Contractors Health Questionnaire”. 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.
	4.4.1	Y	4.4.2	Y		
	4.4.3	Y	4.4.4	Y		
	4.4.5	Y	4.4.6	Y		

4.5 Layout and Product Flow

SOI	Premises and plant shall be logically designed, constructed and maintained.				**Y**	The process flow from raw materials to finished goods is arranged to minimise the risk of contamination Premises provide adequate space for working and storage. All WIP is suitably labelled at each stage of the process and identified by the pallet label which follows it from raw materials through to finished product.
	4.5.1	Y	4.5.2	Y		
	4.5.3	Y				

4.6	**Equipment**				
SOI	Product safety, legality and quality shall be ensured through the use of appropriate equipment that shall be properly designed and maintained.			**Y**	The equipment is designed specifically for its intended purpose and is maintained in a suitable condition applicable to its application. The majority of equipment at site is less than 5 years old. The company have the knowledge and expertise required to ensure compliance with this requirement.
	4.6.1	Y			
4.7	**Maintenance**				
SOI	Proper maintenance and monitoring of all equipment critical to product safety, quality and legality shall ensure consistent high levels of product safety, functionality and quality.			**Y**	A preventative maintenance program is in place for all machinery. This is managed by Bob Addison, site Engineer. Examined records for Slotted No 2 serviced 5/01/2015. Also Folder gluer 05/01/2015. Dong Fang Printer Slotter. Line clearance is performed after maintenance work prior to production starting. Engineering workshops are controlled to minimise the risk of contamination
	4.7.1	Y	4.7.2	Y	
	4.7.3	Y	4.7.4	Y	
4.8	**Staff Facilities**				
SOI	Staff facilities shall be sufficient to accommodate the required number of personnel, and designed and operated to minimise the risk of product contamination. Such facilities shall be kept in a good and clean condition.			**Y**	Suitable hand washing facilities are provided Toilets seen were in reasonable condition with soap, towels and advisory signs in place. Eating, drinking is only permitted in designated canteen room, and all external personnel have a requirement to comply with the company's hygiene policy.
	4.8.1	Y	4.8.2	Y	
	4.8.3	Y	4.8.4	Y	
4.7 Housekeeping and Cleaning				**FUNDAMENTAL**	
SOI	Housekeeping and cleaning systems shall be in place, which ensure that appropriate standards of cleanliness are maintained and that risk of contamination to the product is minimised.			**Y**	
4.9.1.	Good standards of housekeeping shall be maintained, which shall include a 'clean as you go' policy.			**Y**	Company has a "clean as you go policy" in place
4.9.2	The cleaning of production equipment and internal surfaces of storage and production facilities shall be effectively managed using cleaning schedules			**Y**	Cleaning schedules are located on the machines, and in the appropriate areas and were seen for Eterna Die cutter dated 07/01/2015 & Folder gluer 08/01/2015 records were satisfactory completed
4.9.3	Cleaning chemicals shall be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers' instructions. Materials and equipment used for cleaning toilets shall be segregated from those used elsewhere.			**Y**	General purpose is water, Flexi clean used for cleaning printing rollers which is disposed of in the main drains Toilets are cleaned using standard household bleach etc. and stored in a separate locked cupboard in production office.
4.10 Waste and waste disposal					
SOI	Suitable facilities shall be in place for the storage and disposal of process and other waste.			**Y**	Waste water is taken Anglian water (trade effluent) Waste cardboard is recycled by being sent to the baler using conveyors and strapped. The company uses: Keeble – recycled cardboard waste registration number CB/BP3111YF, TLM Management Ltd – domestic material waste licence no CB/QP3291UK Substandard trademarked material is destroyed on site prior to being baled and recycled.
	4.10.1	Y	4.10.2	Y	

4.11 Pest Control						
SOI	The company shall be responsible for minimising the risk of pest infestation on the site.				**Y**	Prokill are the pest controllers. Visits include 8 routine, & 4 EFK services. Specification covering, rats, mice, crawling insects & ants. Shatterproof EFK bulbs, pesticide list of baits in use. Levels of activity in reports ref predominantly to external areas. Site bait plan dated 3.8.2009- no changes. 29 internal bait points 4 external bait points; all toxic baits; 4 EFK units. The site is proofed with various door strips & seals. Additional external perimeter baits re baled paper area would assist in sites first line pest control defence management programme.
	4.11.1	Y	4.11.2	Y		
	4.11.3	Y	4.11.4	Y		
4.12 Transport, storage and distribution						
SOI	The risk of contamination of raw materials and finished products shall be minimised whilst in transport, storage or distribution.				**Y**	Finished products/materials are not transferred externally, and all materials are suitably identified. All incoming goods are examined for damage etc. prior to being rejected or accepted. No damaged or contaminated pallets are used. WIP is suitably labelled with the order number, barcode number etc. Material for recycling is baled and strapped and stored in a specified location, and no off-site storage is used. Company own their own fleet. Of 7 trucks. All are well maintained by the Manufacturers through service agreements.
	4.12.1	Y	4.12.2	Y		
	4.12.3	Y	4.12.4	Y		
	4.12.5	Y	4.12.6	Y		
	4.12.7	Y	4.12.8	Y		
	4.12.9	Y	4.12.10	Y		
5 PRODUCT AND PROCESS CONTROL						
5.1 Product Design and Development						
SOI	Product design and development processes shall be in place to ensure the production of safe and legal products to defined quality parameters.				**Y**	The vast majority of the customers provide their own design only a small percentage is designed in house. Products are designed by the design manager, Malcome Fairman, to meet customer requirements and samples produced for approval. A specification is produced for each item and agreed with the customer prior to beginning routine production. The company retains CAD drawings for future reference, any changes lead to the specification being updated
	5.1.1	Y	5.1.2	Y		
	5.1.3	Y	5.1.4	Y		
	5.1.5	Y				

5.2	Packaging Print Control				
SOI	Processes shall be in place to ensure that print quality meets agreed specifications and critical print content such as allergen/safety/legal information is fully legible and correctly printed.			**Y**	The company uses start up checks to ensure there is no loss of information. Printing plates are numbered and stored in numerical order in racks, and print is approved prior to routine production. Certain checks are performed as per industry standard to identify printing errors e.g. registration, print quality etc. Standard is the print specification approved by the customer from the initial run and saved subsequently from the last run to date. The company does not keep samples of printed packaging, but does retain CAD drawings indefinitely. Unused printed product is suitably destroyed, baled and recycled. Quality checks are performed by the operators who have been suitably trained, and no inspection cabinets used
	5.2.1	Y	5.2.2	Y	
	5.2.3	Y	5.2.4	Y	
	5.2.5	Y	5.2.6	N/A	
	5.2.7	Y	5.2.8	Y	
	5.2.9	Y	5.2.10	Y	
5.3	**Process Control**			**FUNDAMENTAL**	
SOI	The production process shall be controlled through effective quality assurance of operations to ensure packaging materials can be consistently produced to the quality specified by customers.			**Y**	
5.3.1	The company shall undertake a review of the manufacturing and, where applicable, printing process to identify critical manufacturing process control points that could affect the quality of the products produced.			**Y**	The senior management constantly review all processes to ensure consistency of product is maintained. Controls in place include product integrity production procedures with manufacturing work instructions at point of use to ensure products meet the specification and maintain standards of hygiene. The process is also maintained via the reviews of the Hazard & risk study and implemented prerequisite controls.
5.3.2	For each critical manufacturing process control point, machine settings or process limits shall be established and documented – the process specification.			**Y**	Production specifications are available for products. Specifications are approved internally by production & technical personnel. There are manufacturing control points identified in process; managed by QMS procedures – work instructions & prerequisite controls.
5.3.3	Documented process checks shall be undertaken at start up, following adjustments to equipment, and periodically during production, to ensure products are consistently produced to the agreed quality specification.			**Y**	Various quality inspections carried out as per work instructions for each job task. Die cut layout file at work station Colour is maintained via pantone reference matched to approved sample swatch. Inspection regime defined by quality manufacturing plan. First off inspections verified by production machine operatives at start of run.
5.3.4	A clearance procedure shall be in place to ensure that at start up, the line is clear of all previous work and production documents.			**Y**	Line clearance procedure in place as part of operational work instruction C.M.S.1
5.3.5	In the event of changes to product composition, processing methods or equipment, the company shall, where appropriate, re-establish process characteristics and validate product data to ensure product safety, legality and quality are achieved.			**Y**	New specification is raised and new unique spec ref put on system. Revalidation of quality plan to ensure conformity to specification, verification via inspection regime.

5.4	**Product inspection and analysis**				
SOI	The company shall use appropriate procedures and facilities when undertaking or subcontracting inspection and analyses critical to product safety, legality and quality.			**Y**	Quality checks are carried out as per operation work instructions material analysis is conducted by suppliers of raw material. Basic dimensional measuring 3 mm + / - tolerance on chop length verified by steel measures. Tear testing for glue seal integrity zero tolerance as per work instruction. Raw material analysis is carried out by suppliers or raw material as and when required
	5.4.1	Y	5.4.2	Y	
	5.4.3	Y	5.4.4	Y	
	5.4.5	N/A			
5.5	**In-line testing and measuring equipment**				
SOI	In-line measuring or product testing equipment, where used, shall be tested and maintained to ensure it is effective in ensuring product safety integrity and quality.			N/A	Risk assessment has determined that no in-line testing or measuring equipment is needed.
	5.5.1	N/A	5.5.2	N/A	
5.6	**Calibration**				
SOI	Where specialist measuring is required to assess compliance with product safety and legality, the devices shall be maintained and calibrated.			**N/A**	It is not necessary to calibrate equipment. Products are not made to very tight tolerances. Parameters of items manufactured are controlled by precision cutting formes made to specification. Basic dimensional measuring is verified by steel measures. Steel tapes are replaced as and when required.
	5.6.1	N/A	5.6.2	N/A	No calibration equipment used
5.7	**Control of non-conforming product**				
SOI	The company shall ensure that out-of-specification product is clearly identified, labelled and quarantined.			**Y**	Procedure in place Control Of Non-Conforming Product ref 5.6.1 is in place in the form of a process flow chart Non-conforming product is documented relating to the final decision on N.C.P.1. Non-conforming product is 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 e.g. extra resource provided to area where most complaints are received.
	5.7.1	Y	5.7.2	Y	
	5.7.3	Y			

5.8 Foreign body contamination control					
SOI	The company shall be able to demonstrate that effective controls are in place to ensure product is protected from contamination during production and storage.			**Y**	The hazard and risk analysis has identified potential risk from physical contamination e.g. wood, jewellery, sharps, dirt, pests, hairs etc. There is a glass and plastic procedure in place ref “Glass and Brittle Plastic Control”. Any breakages are recorded in an incident report form Internal lighting fluorescents with covers or sleeves There is a procedure in place ref Knife Cutting Blades and Sharps Control 5.7.11. No blades were seen where they could contaminate the product, and blades are engraved with ID number and dispensing is controlled by the Production Manager. No snap off blades are used Knife Blade and Sharp Inventory ref K.B.S.I.1, there is a knife blade and sharps log to ensure control.
5.8.1 Foreign body control					
	5.8.1.1	Y	5.8.1.2	Y	
	5.8.1.3	Y			
5.8.2 Sharps Control					
	5.8.2.1	Y	5.8.2.2	Y	
	5.8.2.3	Y			
5.8.3 Chemical control					
SOI	Controls shall be in place to prevent contamination from chemical hazards.			**Y**	Chemicals are controlled via COSHH & Reach MSDS sheets readily available displayed in foyer entrance to production on safety notice board. PRP programmes, GMP procedures manage any potential microbiological contamination. Water based inks & adhesives in use. Chemicals stored in designated locations.
	5.8.3.1	Y			
6. PERSONNEL					
6.1 Training and competence				**FUNDAMENTAL**	
SOI	The company shall ensure that all employees are adequately trained, instructed and supervised commensurate with their activity and are competent to undertake their job role.			**Y**	
6.1.1	All personnel, including temporary personnel, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period.			**Y**	All personnel have induction training which includes manual handling, fire drills, health and safety policy, hygiene and quality requirement training etc. The employees are also trained in specific tasks via a skills assessment which is done annually. Based on the weighting criteria they are given a percentage score for Personal profile and Skills points in an annual review which determines salary/training etc.
6.1.2	The company shall routinely review the competencies of staff and provide relevant training as appropriate. Records of training shall be maintained.			**Y**	The company uses a skills matrix and personnel are observed irrespective of how long they have been with the company. The observation is done by the Production Director where each employee is given three new targets to be met. Viewed records for Sebastian Misko. Lee Millard. Glen Sheeberg. Jason Lepard.
6.2 Access and movement of personnel					
SOI	The company shall ensure that access and movement of personnel, visitors and contractors shall not compromise product safety and quality.			**Y**	Designated painted route ways in factory are suitable and sufficient to separate personnel from product. Site plans for access and personnel movement with routeways -walkways re staff entry points into production, welfare areas & material storage
	6.2.1	Y	6.2.2	Y	

6.3 Personal hygiene						
SOI	The company's personal hygiene standards shall be documented and adopted by all personnel, including visitors to the production facility. These standards shall be developed with due regard for risk of product contamination.				**Y**	There is a jewellery policy in place ref Personal Hygiene Policy (section 1.5 Personal Belongings). Mobile phones are not permitted in production ref Personal Hygiene Policy. Eating/drinking etc. is only permitted in the canteen area. Drinking of water is permitted near equipment from spill proof containers
	6.3.1	Y	6.3.2	Y		
	6.3.3	Y	6.3.4	Y		
6.4 Protective Clothing						
SOI	The risk of product contamination from clothing, hair or personal items shall be minimised.				**Y**	Company issued protective garments consist of 3 x Polo shirts, trousers & t Shirts that are suitable & 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.
	6.4.1	Y	6.4.2	Y		
	6.4.3	Y	6.4.4	Y		