INTERNATIONAL
ACCREDITED COMPANY
BRC Global Standard for Packaging
UKAS PRODUCT CERTIFICATION
Registration Number 046

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
Environmental Awareness	Choose an item	
Choose a module	Choose an item	

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

Number of non-conformities		
	Major against SOI of Fundamental	0
	Critical	0
	Major	0
	Minor	4

Company details

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

Company profile

Plant size (square metres)	<10K sq.m	No. of employees	1-50	No. of key processes	1-3
Subcontracted processes	No				
Other certificates held	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	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. 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. Due to some issues with the current Pallet line, approval to purchase a replacement pallet and wrapping line and due to a shortage of capacity an extra Eterna Die Cutting Machine has been approved, both machines are due to be installed during the first quarter of 2016.				

Company profile

	There have been no changes to products or machinery since the last assessment. The site has a management commitment and expansion plans to ensure they reach capacity. The Company has an integrated Quality and Hygiene Management system with procedure and systems that are in compliance with the requirements of the BRC Global Standard for Packaging and Packaging Materials. The site employs 50 persons with only 30 on site at any one time.

Product and process characteristics

Field of Audit (Glass Paper Metal Rigid plastic Flexible plastic Wood and other material Print Chemical processes)	02 - Papermaking Category Category Category Category Category Category
Products in production at the time of the audit	Corrugated cases, trays and lids for a variety of customers, one of which was for food use

Audit duration details

Finish date	2016-01-06		
Re-audit due date	2017-01-06	Previous audit date	2015-01-08
On-site duration	8 hours	Duration of production facility inspection	2 hours
Reasons for deviation from typical or expected audit duration	Compliant with PO51 30 persons on site & buildings occupy 5295m2		
Next audit type selected	Announced		

Audit duration per day

Audit days	Date	Audit start time	Audit finish time
1 (start date)	2016-01-06	09:00	17:00

Auditor information		
Auditor number	Auditor Name	Role
110021	Paul Blake	Auditor

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.7) Name / Job Title	Opening meeting	Site inspection	Procedure review	Closing meeting
John Watson, Managing Director	X		X	X
Mark Bennett, Production Manager		X		
Krzystof Kropidolowski, Operator Case maker		X		
Glenn Schneeberger, Warehouse man		X		

Non-Conformity Summary

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

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

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

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	1.3.1	Deputies are not clearly documented	Company structure chart now updated to include deputies.	Now included these will be updated with the whole company structure periodically	Updated document	2016-01-28	Paul Blake
2	2.2.4	Hazard and Risk flow chart does not cover the receipt and approval of artwork	Process control (pro 5.2.1) amended to show receipt and approval of artwork	The process always approved print but we had assumed if came under design development, now we specifically state print approval.	Updated process flow document	2016-01-28	Paul Blake
3	4.7.5	There are no measures to prevent engineering debris from entering the production area	A swarf matt has been placed in the entrance to the engineering room	We were not aware of this and have now made the engineers aware of why we have a swarf matt in the entrance	Photograph	2016-01-28	Paul Blake
4	5.3.6	The company does not keep samples of printed packaging	Inspection /check lists now state all printed samples will be kept for 48 hours	We had not specified in our inspection check list the time scale to keep samples so it was very discretional, now with the change of the inspection/check list we keep all samples for 48 hours.	Updated documents	2016-01-28	Paul Blake

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

Voluntary Modules Non-Conformity Summary Sheet

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

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

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

Detailed Section

1.	Senior management commitment
1.1	Senior management commitment and continual improvement
	Hygiene and Quality policy in place signed by John Watson MD, Chris Monahagn Production Director and Mark Bennet Production Manager, dated 2012-12-01, issue 2. Contains commitment to supply safe and legal products. Clear objectives are set during each management review and these are reviewed during review meetings. The site employs the use of an external consultant on a monthly basis who is a member of the Sheet Plant Association, (SPA) Industry Body, and use their website, BRC Directory for Standard information. The site has a genuine PDF copy of the Standard, and the audit is being carried out within the required audit window. There were no Non-conformities raised during the last audit.
1.2	Management review
	The management review is carried out six monthly with interim reviews as necessary. The last review was 2015-11-04 and covered the following topics • Minutes of the previous Management review • Results of Audits (Internal, 2nd and 3rd Party audits) • Customer Complaints and performance indicators • HARM • Process errors, incidents, corrective actions • Sites performance against KPI's This review is documented and circulated to the relevant staff. Product safety, legality and quality issues are raised as Internal complaints which are dealt with as external complaints and fully investigated
1.3	Organisational structure, responsibilities and management authority
	The site has an organisation chart in pace showing the management structure, dated 2015-08-18 issue 3 Deputies are not clearly documented (NC1) Work instruction are in place and on display at point of use.
Non-applicable clauses	

2.	Hazard and risk management system
2.1	Hazard and risk management team
	The company has carried out a Hazard analysis in accordance with the requirements of this standard, section 2. The study was carried initially out 2009-09-14 & reviewed quarterly annually for suitability, last review 2015-11-07.

2.2	Hazard and risk analysis
	The scope covers all products manufactured in accordance with The conversion of corrugated die cut 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. There is a process flow diagram in place that covers; • Receipt of raw materials • Each manufacturing process step • In-line testing and measuring • Customer returns • The use of recycled materials The receipt and approval art work is not covered by the process flow diagram (NC2) 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 9 of issue 5. 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. There have been no CCP's identified in the process. The team are aware the typical and historic hazards associated with the corrugated industry and their customer base. Codes of practice from the European Federation of Corrugated Board Manufacturers (FEFCO), Legislative requirements are obtained from FEFCO and Sheet Plant Association, the latter of which the company is a member. The hazard and Risk Management system receives an annual review in the 4th quarter each year as part of the Management Review.
2.3	Exemption of requirements based on risk analysis
	There were no requests for exemptions
Non-applicable clauses	2.2.8, 2.2.9

3. Product safety and quality management system

3.1	Product safety and quality management system
	The company have a QMS management system that consists of a Hygiene Quality & GMP manual issue 1 dated 3rd 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.

3.2	Documentation control
	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. 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.
3.3	Record keeping
	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. Hard copy records range from 6 to 36 months depending on record type. 3.9.1 Control of Records procedure in place, Issue date 2009-09-03 version 1. The current retention outlives the life of the product.
3.4	Specifications
	Specification made through ABBCA software. Examined specification for CPP – CM Ltd. Specification number CPL509433/A. Dimensions 363mm X 281mm X 141mm Board B Flute 150 test, inner lining 150 test material. 100% recycled. Specifications are only entered on the ABACA System if they have been agreed with the customer. Food contact packaging is not produced, only tertiary, so no declaration of compliance is required, 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.
3.5	Internal audits
	The company has a schedule of internal audits to ensure that their systems are compliant with this standard, last years scheduled was completed and this year's is in place, all audits are carried out by trained internal auditors no one audit an area they are responsible for. Internal audit reports for Audit ref JA7 2015-10-14, and MB6 2015-07-09 both show conformity as well as non-conformity.
3.6	Supplier approval and performance monitoring
	Supplier Management system in place governed by procedure 3.5.1 Assessment of Suppliers and Contractors issue 1 2009-09-03, 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.

3.7	Management of subcontracted processes
	The only Sub-contracted process is the production of artwork and stereos for printing, Customer 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 stereos 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 release to the customer from anywhere else.
3.8	Management of suppliers of services
	This is covered by procedure 3.5.1 and contract or agreements are in place, the one for transport with Atlas Couriers was updated on 2016-01-04 stating that their vehicles will be provided in a suitable condition for the required use.
3.9	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, on this occasion it was with CWO22563 for Lizzies food, first batch of, 1500 units, this job were delivered 2015-11-24. No Rework of any sort is carried out on site.
3.10	Customer focus and contract review
	The QMS has identified roles that are responsible for the communication with the customer, this is carried out by the Sales department, via e-mail and telephone calls predominantly. Customer needs and expectations are stored on the ABACA System in the form of specifications, each time a customer places an order, the specification is checked and confirmation that is correct is sought from the customer prior to production. Changes to a specification of a product would mean new specification number, or in the case of just a print content change, a change to the specification suffix.
3.11	Complaint handling
	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. 77 Internal and External complaint raised in 2015. 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 has ultimately led to the planned replacement of this part of the process with a new unit.

3.12	Management of product withdrawals, and incidents and product recalls
	All personnel advised on Induction and at appropriate intervals on incidents and actions to be taken; records of training on file. Product recall – withdrawal procedure 3.12.3 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 recall carried out with Lizzies Food, Job CWO22563, materials ordered form Smurfitt on PO 315875, delivered to site on 2 pallets 2015-11-20. 2 batches of 1500 delivered to Lizzies on 2015-11-24 & 2015-12-22. Lizzes 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.
Non-applicable clauses	3.9.5

4.	**Site Standards**
4.1	External standards
	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. The external storage of raw materials is not required or possible due to the nature of the raw materials.
4.2	Building fabric and interiors
	The internal walls, floors and suspended ceilings are kept in a good condition, light in the production area are sleeved to protect product and machines against glass fragment in the case of breakage, there is lighting 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 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 CPL ISMS-Risk Assessment issue 1 dated 2012-08-06. 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. 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
	AL site plan has been produced that shows; • Personnel access points • Travel routes • Staff facilities • Process flow • Storage areas Process flow has been put in place in such a way so as to reduce the risk of contamination or damage to the product.
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.
4.7	Maintenance
	A preventative maintenance program is in place for all machinery. This is managed by Bob Addison, site Engineer. Examined weekly records for Lambo Stitcher 2015-10-19. Dong Fang Printer Slotter 2015-10-19. Line clearance is performed after maintenance work prior to production starting. Engineering workshops are controlled to minimise the risk of contamination, However, there are no measures to prevent debris from entering production area. (NC3) If contractors are used the Production Supervisors will supervise them throughout their stay.
4.8	Housekeeping and cleaning
	The company has a 'Clean as You Go' policy in place, with cleaning schedules for the machines and general areas, with cleaning records seen for the Eterna Large die cutter and the printer case maker dated 2016-01-06, the records were completed satisfactorily. Cleaning chemicals are stored in a cupboard away from the production area.
4.9	Product contamination control
4.9.1	Glass, brittle plastics, ceramics and similar materials control
	Glass and brittle plastics in the production area is 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 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.
4.9.2	Sharps control
	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. Snap off blades are not permitted on site.

4.9.3	Chemical and biological control
	All non-production chemicals are stored away from the production areas, all chemical seen were clearly labelled and closed. Also available are the MSDS Sheets at point of storage.
4.10	Waste and waste disposal
	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.
4.11	Pest control
	The site has engaged the services of a company called Prokill for pest control, they are contracted for 8 routine, 4 EFK services and 1 EFK tube change visit. Contract Is for rodents, flying and crawling insects, all baits are toxic all shown on an up to date bait plan, latest visit 2015-12-23 no issues found
Non-applicable clauses	4.11.3

5.	**Product and process control**
5.1	Product development
	The design of most products is provided by the customer with very few being produced in house, those that are being done by the Design Manager, samples are produced and customer approval is sought before moving on to the production run. Once approved the specification is made active in the ABACA system so that it can be used for a production run. Short trial runs are manually produced. The company retains CAD drawing for future reference, any changes will lead to a new specification being created.
5.2	Graphic design and artwork control
	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.

5.3	Packaging print control
	A system of start-up checks is in place to ensure that there is no loss of information. Printing stereos are stored in hanging racks to minimise the risk of damage, each print run is approved against the print specification and this is recorded in the ABACA system, a system of checks is in place as product comes of the slotter and case maker, any print errors noticed are corrected and any non-conforming product destroyed. Composite printing is not carried out on site. The company does not keep samples of printed packaging (NC4) but does retain CAD drawings and ABACA, process check records indefinitely.
5.4	Process control
	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. 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 captured at this point and determined by materials and machine used.
5.5	Calibration and control of measuring devices
	It is not necessary to calibrate equipment as products are made to light tolerances, measurements are controlled by purpose made forms which cannot be altered on site, these forms are precision cutters built to specification. Steel rule and tapes are used to check basic dimensional measures, these are replaced as required.
5.6	Product inspection, testing and measuring
	The company HACCP has determined that no in-line testing or measuring equipment is necessary. However 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.
5.7	Control of non-conforming product
	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.

5.8	Incoming goods
	Incoming raw materials are received from two main suppliers, 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 processed or stored in the warehouse area All material destined for recycling is baled and stored until taken for recycling.
5.10	Dispatch and transport
	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 and unsuitable vehicles turned away, there is an agreed terms and conditions document in place the couriers used. All drivers comply with the site rules relevant to this Standard, Driver do not need to enter the production or storage areas of the site.
Non-applicable clauses	5.3.5, 5.5, 5.6.3, 5.9.3,

6.	**Personnel**
6.1	Training and competence
	All personnel receive induction training before starting their first shift in production or storage areas, and are supervised by their team leader. Once they have been assigned an area of work they get on the job training, which is signed off and recorded for the processes they are working. Regular reviews of training are carried out to ensure that staff are competent to carry out their tasks. Training records for Krzystof Kropidolowski were viewed for the case maker dated 2015-10-28, and Induction records for Marek Halasa dated 2015-10-26, as the newest member of staff
6.2	Personal hygiene
	He company HACCP has determined the jewellery policy that includes no wristwatches or mobile phones, only plain band rings and small sleeper earring are permitted as visible jewellery. The hygiene policy forms part of the induction programme to ensure that all staff know it. All production and storage staff are provided with a locker for the storage of personal belongings.

6.3	Staff facilities
	Suitable hand washing facilities are provided Toilets seen were in reasonable condition with soap, towels and advisory signs in place and do not open directly into the production or storage areas. Eating, drinking is only permitted in designated canteen room, and all external personnel have a requirement to comply with the company's hygiene policy. Smoking is only permitted at a designated, part covered external location that was seen to be kept in a clean condition.
6.4	Protective clothing
	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.
Non-applicable clauses	

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	