



P003 Global Standard for Packaging and Packaging Materials Issue 3: January 2008
Audit Report

BRC GLOBAL STANDARD
THE WORLDWIDE STANDARDS OF CHOICE

Global Standard for Packaging and Packaging Materials Issue 3 : January 2008

Audit Result: Certificated

Audit Frequency : 12 months

Company Details	
BRC Site Code: 1810344	
Company Name : Tyne Tees Packaging Limited	
Site Name : Newton Aycliffe	
Address : Grindon Way, Heighington Lane Bus. Park, Newton Aycliffe, Co Durham	
Country : UK	Postcode : DL5 6DQ
Telephone : 01325 311114	Telephone : 01325 311301
Company Representative Name: Mark Barron	
Email : markb@tyneteespackaging.co.uk	

Certification Body Details	
Name of Certification Body : QA International Certification Ltd.	
Auditor Number (only one : team leader) 110001	Auditor Names B L Fowler

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P003 Issue:3 9.4.09	Page 1 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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**P003 Global Standard for Packaging and
Packaging Materials Issue 3: January 2008
Audit Report**

Audit Start Date: 2011-07-12 **Audit Finish Date:** 2011-07-12

Re-audit Due Date 2012-07-13 **Previous Audit Date:** 2010-07-05

:

Scope Details	
Packaging Category	2
Audit Level	2
Packaging Field PACKAGING3	
2 Paper	

Scope of Audit The manufacture of decorative and transit corrugated packaging
Exclusions from Scope None
Products in production at the time of the audit Corrugated Cases

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P003 Issue:3 9.4.09	Page 2 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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**P003 Global Standard for Packaging and
Packaging Materials Issue 3: January 2008
Audit Report**

Key Personnel				
Name/Job Title	Present at Audit (x)			
	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings				
Gerard Wiper, Managing Director	X			X
Mark Barron, Operations Manager	X	X	X	X
Eric Williams, Transport & Warehouse Manager		X	X	
Lucy Donald, Commercial Sales Director	X			X

Company Profile
<p>The privately owned company, founded in 1982 occupies well appointed premises on a light industrial estate in County Durham. Since the original occupation, additional buildings have been added and there has been considerable investment in modern state-of-the-art conversion machinery. The first impression at this visit demonstrates a world-class operation, in the top decile of corrugated conversion plants</p> <p>Equipment and the site facilities have been significantly improved by extensive investment in superior quality new machinery to enhance product quality and productivity with excellent application of modern production engineering technology incorporated into product control systems to achieve a product meeting all customer requirements for outstanding presentation of food and beverages. The company has made a significant investment in new machinery (Bobst and stitcher/gluer) to meet changing customer demand.</p> <p>The standard of housekeeping is excellent, with a corresponding culture reflecting the hands-on application of management supported by the dedicated workforce. The fabric of the building is in good condition and the location is excellent for the production of food grade product.</p> <p>All employees have been trained to fulfil all of their duties in a safe and hygienic manner and the company meets the requirements of the BRC Global Standard for Packaging and packaging materials.</p>

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P003 Issue:3 9.4.09	Page 3 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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Packaging Materials Issue 3: January 2008**
Audit Report

Audit Duration Details
On-site audit duration 8 Man Hours
Duration of production facility audit 2 Man Hours
Reasons for deviation from typical (12 hours) or expected on-site audit duration or typical (3 hours) site inspection duration Small company, well established IMSM

Audit Duration per day		
	Start time	Finish time
Day 1	0955	1700
Day 2		

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P003 Issue:3 9.4.09	Page 4 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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NON-CONFORMITY SUMMARY SHEET

List of Non Conformities

Critical

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Revisit date	Reviewed by

Major

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Evidence provided Document Photograph Visit/Other	Reviewed by

Minor

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Evidence provided Document Photograph Visit/Other	Reviewed by

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P003 Issue:3
9.4.09

Page 5 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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Audit Report

Detailed Audit Report

BRC Requirement No.	REQUIREMENT	Conforms	Details
		Y, N	
		or N/A	
1	SENIOR MANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT		
Statement of Intent	The company's senior management shall demonstrate they are fully committed to the implementation of requirements of the Global Standard for Packaging. Opportunities for improvement shall be identified, implemented and fully documented.	Y	
1.1	The company's senior management shall provide the human and financial resources required to implement and improve the technical management systems.	Y	Discussion with Operations Manager at opening meeting. Management review and memos 5 th July 2011. Very detailed reports and comprehensive notes from each department Manager including Gerard Wiper. New Bobst commissioned, SPOCS software for SAP system is developed and running; the next step is to introduce paperless work tickets. New CAD table has been installed in new booth in Warehouse. Minutes of meetings implementing quality improvement tasks.
1.2	The company shall have an organisation chart demonstrating the structure of the company.	Y	Quality Hygiene and GMP Manual, Part 1; issue 2 9/7/08
1.3	Clear communication and reporting channels shall be in place to report on and monitor compliance with the Standard.	Y	Organisation chart and responsibilities in Part 1 Section 5 issued 20/05/10
1.4	The control of the system implementing the Standard shall rest with a suitably competent person (the designated manager).	Y	Prepared by consultant (Gareth Jones) approved by M/D
1.5	The designated manager shall have a designated, suitably competent deputy to provide support and cover for absence.	Y	Mark Barron, Operations Manager
1.6	The company's senior management shall take responsibility for reviewing compliance with requirements of the Standard.	Y	Policy signed by four senior managers/Directors
1.7	The review process shall be undertaken at appropriate planned intervals, as a minimum annually, to ensure critical evaluation of the product safety and risk management system's suitability and effectiveness.	Y	Reviewed on 5/7/11 by Management Team

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P003 Issue:3 9.4.09	Page 6 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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1.8	The review process shall include the evaluation of: <ul style="list-style-type: none"> • internal, second party and third party audits • previous management review documents and action plans • customer performance indicators, complaints and feedback • incidents, corrective actions, out-of-specification results and non-conforming materials • process performance and deviation from defined parameters • reviews of the hazard and risk management system • developments in scientific information associated with the products produced by the company • resource requirements. 	Y	Minutes of meeting on 5 th July 2011 plus supporting reports by individual managers held in Management Meetings 2 folder
1.9	Records of management reviews and corrective action shall be comprehensively documented and retained.	Y	Comprehensive sets of notes in the Management Meetings folder
1.10	The company shall have a system in place to ensure that it is kept informed of relevant product safety issues pertinent to this category; legislative requirements, scientific and technical developments; and Industry Codes of Practice applicable in the country of production and, where known, the country where the product will be sold and/or ultimately used.	Y	Use of a very competent consultant who has extensive experience in the sheet fed industry.
1.11	The company shall ensure that the materials manufactured comply with the relevant legislation in the country which the products are sold and/or ultimately used, where known.	Y	Access to www.foodcontactmaterials.com . Advice from Gareth Jones, Sheet Feed Association
1.12	The company shall have the current issue of the Global Standard for Packaging available.	Y	Copy presented by the company; Company also has a copy of Issue 4 and is starting to amend procedures to suit the new requirements
1.13	The company's senior management shall ensure that non-conformities identified at the previous audit against the Standard are effectively actioned.	Y	None raised at last audit
2	HAZARD AND RISK MANAGEMENT SYSTEM		
Statement of Intent	A formal hazard and risk management system shall be in place to ensure that all hazards to product safety and integrity are identified and appropriate controls established.	Y	The company has carried out a Hazard Analysis and Risk assessment in accordance with the requirements of section 2 of this standard in August 2005. The analysis was reviewed by the Hazard Analysis team on 7 th June 2011. The hazard analysis ensures that product integrity and critical defects are controlled in accordance with Section 2 of the BRC Standard. Prerequisites are established as required by the standard covering sections 4,5 and 6 of the standard

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P003 Issue:3
9.4.09

Page 7 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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Audit Report

2.1 Hazard and Risk Management Team			
2.1.1	The hazard and risk management system shall have senior management commitment and shall be implemented through the company's documented management system.	Y	The systems are approved by the Operations Manager
2.1.2	The hazard and risk management system shall be developed, reviewed and managed by a multidisciplinary team. In the event that the company does not have the appropriate expertise in-house, external expertise shall be sought and used to develop and review the hazard and risk management system. However, the day-to-day management shall remain the responsibility of the company.	Y	Four team members headed by Mark Barron, document signed by Managing Director
2.1.3	The multidisciplinary team shall have a clearly identified leader who shall be suitably trained in hazard analysis and risk management techniques.	Y	The team ensures a full view of the overall process and employee ownership.
2.1.4	The team shall be suitably trained and kept up to date with factory changes and customer requirements as they occur.	Y	Training of all four done by consultant who is nominated by the Sheet Feed Association
2.2 Hazard and Risk Analysis			
2.2.1	The company shall establish and document the packaging category to be implemented using the packaging category determination decision tree.	Y	Customers require category 2 standard. Risk assessment methodologies, and decision tree have been used to determine category.
2.2.2	The packaging category shall be verified through the hazard and risk management process.	Y	See above, decision tree method used.
2.2.3	During a hazard and risk analysis the company shall take into consideration known and potential hazards and risks related to the process and raw materials. It shall include the warehouse or storage associated with the production processes.	Y	The HACCP is well expressed. All chemical, Physical, Biological and Quality factors are considered and satisfactorily addressed. PRP's controlling product contamination are in place
2.2.4.	The hazard and risk analysis shall consider microbiological, foreign objects and chemical contamination, legality and defects critical to consumer safety as well as those hazards that may have an impact on the functional integrity and performance of the final product taking into account the customer requirements.	Y	The hazard and risk analysis considered Chemical, physical and biological contamination as well as defects critical to product safety.

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P003 Issue:3 9.4.09	Page 8 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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2.2.5	The hazard and risk analysis shall be appropriately recorded and shall incorporate the following steps: 2.2.5.1 A full description of the product, taking into account the intended use by the customer. 2.2.5.2 Establish a precise, validated plan of process flow(s). 2.2.5.3 Identify and record hazards associated with possible failure at each process step and the controls required. 2.2.5.4 Assess the risk level for each hazard based on the likelihood of the occurrence and the severity of the outcome. 2.2.5.5 Identify those process steps which are critical to the safety and quality of the final product. 2.2.5.6 Confirm and implement the control and monitoring procedures including clearly defined limits appropriate to the level of risk. 2.2.5.7 Establish the corrective action to be taken when monitoring indicates a loss of control. 2.2.5.8 Establish the documentation for all the procedures and records necessary to maintain process control. 2.2.5.9 The monitoring and controls required by the hazard and risk analysis shall be regularly reviewed, verified and validated to ensure they are up to date and functioning effectively.	Y	<ol style="list-style-type: none"> 1. In the management review 2. Starts at customer enquiry to establish customer need, 3. Detailed in flow chart 4. Low risk for each hazard 5. No CCP's identified. 15 PRP's 6. Limits are determined mainly by tape measure and fit, samples are always available for reference. 7. Quality system Part 2 section 7 and 8 define quarantine and resort or scrap 8. Well-documented and controlled systems in place. 9. The HACCP is reviewed annually.
2.2.6	Procedures relating to the monitoring of critical process steps shall be included in internal audits against the Standard (refer to clause 3.4).	Y	No CCP's identified (PRP's cover contamination)
2.2.7	Review of the hazard and risk management system shall be carried out at least once per year or when any process changes.	Y	See above at management review.
2.2.8	Upon a request in writing from a customer, the company shall conduct a supplementary hazard and risk analysis specific to use of a product of the company that is outside the promoted range of uses. This shall be specific to that use and for that customer only and shall be considered exceptional.	Y	Not required, no customer has ever requested this.
2.3	Hazard and Risk Management Prerequisites		
2.3.1	A hazard and risk analysis shall be fully supported by the implementation of the prerequisite requirements set out in requirements clauses 4 to 6. The hazard and risk analysis may indicate that some of these requirements are not applicable. These shall be documented and regarded as proposed exemptions for review at audit. Acceptance or rejection of the proposed exemptions shall be recorded in the auditor's report.	Y	See above, pre requisites in place and functioning well. Covered in Part 2 of the IMS manual
2.3.2	The company shall keep recorded exemptions to the Standard under review and provide documented evidence of this review at subsequent audit.	Y	No exemptions defined.
3.0	TECHNICAL MANAGEMENT SYSTEM		

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P003 Issue:3
9.4.09

Page 9 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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Audit Report

3.1	Technical Management Policy		
3.1 Statement of Intent	The company's senior management shall develop and document the company's quality and hygiene policy ensuring it is authorised, reviewed, signed and dated by an appropriate senior manager and implemented.	Y	Compliant, Safe and Legal product
3.1.1	The policy shall state the company's intention to meet its obligations to produce safe and legal products and to meet customer requirements.	Y	Safe and Legal in text
3.1.2	The policy shall be understood by all supervisory and relevant personnel and implemented accordingly.	Y	On notice boards throughout site
3.1.3	The policy shall be communicated throughout the company and regularly reviewed.	Y	Provided at induction.
3.2	Quality Manual		
3.2 Statement of Intent	The company shall have a manual that states its commitment to quality and hygiene and plans its effective implementation.	Y	Manual in place and signed by the Managing Director, revs to version issue 2 09/07/2008. Covers version 3 of the BRC standard – about to be revised for Issue 4
3.2.1	The manual shall have a scope which covers the requirements of this Standard and shall be maintained as an essential element of demonstrating compliance with this Standard.	Y	Scope is relevant to the company's product range and equipment
3.3	Customer Focus and Contract Review		
3.3 Statement of Intent	The company's senior management shall ensure that processes are in place to determine customer needs and expectations and ensure these are fulfilled.	Y	The company management have reviewed all company practices and procedures. Actions planned for new equipment.
3.3.1	The company shall clearly identify those individuals responsible for communication with customers and shall have an effective system for communication.	Y	Responsibilities detailed in Part 1 Section 5, amplified in recent management meetings
3.3.2	Customer needs and requirements shall be reviewed on a suitable predetermined frequency. Any changes to existing agreements or contracts shall be agreed, documented and communicated to appropriate departments.	Y	Frequent customer liaison through sales order negotiations and site visits.
3.4	Internal Audits		

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P003 Issue:3 9.4.09	Page 10 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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3.4	The company shall audit those systems and procedures which cover the requirements of the Global Standard for Packaging to ensure they are in place, appropriate and complied with.	Y	Audits are planned for May 2011 – all completed and implemented to date; last audit on 24 th May 2011
Statement of Intent			
3.4.1	An internal audit procedure shall be documented and shall specify the scope and frequency of audits which shall be established in relation to the risks associated with the activity. Audits shall be carried out by nominated, appropriately trained personnel who shall be independent of the activity being audited.	Y	Auditor training of Mark Barron done by Scope
3.4.2	Deficiencies and details of non-conformities shall be notified to appropriate supervisory staff and corrective action implemented within a specified and appropriate time period. This shall be documented.	Y	Part 2 Section 8. Control of Nonconforming Product and Corrective and Preventive action.
3.4.3	The management shall review a summary of audits and ensure corrective action has been taken.	Y	This is part of the annual Management System review. Ref minutes above
3.4.4	Records of internal audits shall be maintained to ensure that conformity as well as non-conformity can be clearly identified and verified.	Y	Evidence of audits of PRP's on 24.5.11 - audit of all sections of the standard.
3.5	Supplier Monitoring		
3.5	The company shall operate procedures for approval and monitoring of its suppliers. This shall include suppliers of materials and services to the company where appropriate to this Standard.	Y	Part 1 Section 13; Suppliers are few; Prowell are not BRC certificated but have been visited and produce good product. Records cover plant in Landau, Germany. The performance, quality and service of materials and their suppliers are continually monitored
Statement of Intent			
3.5.1	The company shall have a documented supplier approval procedure and continual assessment programme in place, based upon hazard and risk analysis.	Y	All supplier assessment records are in place. Approved supplier folder – sheet, inks, packaging, contractors including. forme-makers
3.5.2	Records of any results of supplier assessment and any necessary actions shall be maintained.	Y	Folder of completed questionnaires – eg Smurfit, DS Smith, Antonine Inks, Prowell
3.5.3	As part of hazard and risk analysis, and where appropriate, suppliers of packaging materials shall either be certified to this Global Standard for Packaging or the company shall be responsible for ensuring their suppliers are undertaking adequate technical practices which are maintained, audited and documented.	Y	David S Smith and Smurfit are well known in the industry for supply quality.
3.6	Subcontracting of Production		

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P003 Issue:3
9.4.09

Page 11 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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Audit Report

3.6	Procedures shall be in place for the effective control of subcontractors.	Y	No subcontractors used.
Statement of Intent			
3.6.1	Where any production processes are subcontracted, the risks to the product from this process shall form part of the hazard and risk analysis.	Y	N/A see above
3.6.2	The company shall carry out a hazard and risk analysis to establish whether any subcontractor should be certified to this Standard.	Y	N/A see above
3.7	Documentation Control		
3.7	The company shall ensure that documented procedures are established and maintained to control all documents.	Y	
Statement of Intent			
3.7.1	All documents in use shall be properly authorised and be the current version.	Y	Amended to new version of Manual - issue 2 in July 2008
3.7.2	Documents shall be clearly legible, unambiguous and sufficiently detailed to enable their correct application by appropriate personnel and shall be readily accessible at all times.	Y	Clearly typed
3.7.3	All changes and amendments to documents critical to product safety, legality or quality system procedures shall be recorded.	Y	Listed Part 3 section 1
3.7.4	A procedure shall be in place to ensure obsolete documentation is rescinded and, if appropriate, replaced with a revised version.	Y	Part 1 Section 6
3.7.5	Documentation and records shall be retained as defined within the company quality manual, and the period of record retention shall be appropriate to the usable life of the packaging in recognition of the customer requirements.	Y	Part 4 Section 1 – 1 to 3 years dependent on use
3.8	Specifications		

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P003 Issue:3
9.4.09

Page 12 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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Audit Report

3.8	The company shall ensure that appropriate specifications exist for raw materials, intermediate and finished products and any product or service which could affect the integrity of the finished product and customer requirements.	Y	
Statement of Intent			
3.8.1	Specifications shall be adequate, accurate and shall ensure compliance with relevant product safety and legislative requirements.	Y	Each product has a spec eg Worthington Armstrong W/O 119715 Spec and Forme no. 42906, Sheet from Prowell, W/O cited on pallet label for sheet. Specification defines box size, material including source, make-up and print on layout sheet.
3.8.2	Specifications shall, where appropriate, be formally agreed with relevant parties.	Y	Acknowledged to customer to define scope of supply
3.8.3	Specifications shall be maintained, which ensure that components or articles used shall be suitable for intended use.	Y	Acknowledged to customer to define scope of supply, sheet make-up and fluting etc.
3.8.4	Trademarks for application on packaging materials shall, where appropriate, be formally agreed between relevant parties.	Y	Advised by customer on Artwork
3.8.5	The company shall operate a specification review procedure.	Y	Reviewed at Contract Review for each enquiry
3.9	Record Keeping		
3.9	The company shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.	Y	
Statement of Intent			All records are up to date and are appropriately archived on completion.

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P003 Issue:3 9.4.09	Page 13 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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Audit Report

3.9.1	Records shall be maintained in order to demonstrate that technical and hygiene procedures have been followed. Records shall include as a minimum, the following: <ul style="list-style-type: none"> • Hazard and risk management plan and verification • Records supporting product compliance and suitability for food/cosmetics/toiletries use • Management review • Training • Internal auditing • Traceability • Supplier monitoring • Results of any product analysis • Cleaning schedules and cleaning records • Instances of foreign-body contamination • Receipt and investigation of customer complaints • Pest control reports and records • Maintenance and engineering work • Control of glass and brittle plastics • Control of blades and sharp objects • Product recall – test and actual • Non-conforming goods • Calibration of equipment. 	Y	Records examined on site tour and in office for: Hazard and risk management, records supporting product compliance, Management review, training, internal audits, supplier monitoring Cleaning schedules and cleaning records. Receipt and investigation of customer complaints, pest control reports and records Maintenance and engineering work for each machine,checked folder for Max Gluer. Control of blades and sharp objects, Product recall – test Non-conforming goods. The above list is not exhaustive.
3.10	Traceability		
3.10	The company shall have a system in place to trace materials through all stages, including purchasing, processing and distribution of the finished product to the customer.		
Statement of Intent		Y	Traceability is fully functioning Sheet suppliers quote their internal order number and the TTP works Order number which follows the job through the process to despatch.
3.10.1	The company shall ensure that its suppliers have appropriate traceability systems in place to comply with relevant legislation in the country of intended use where known.	Y	Full traceability on all sheet stacks – Checked Prowell material O/No 119705125K/125T B flute. The Job number is applied to all material through to finished product labels.
3.10.2	The company shall have a system which has the ability to trace and follow all raw materials from source through all stages of processing and distribution of the finished product	Y	Procedure Section 1 part 8 – a bespoke system SPOCS has been developed by IT to control all orders and material requirements.
3.10.3	An appropriate system shall be in place to ensure the customer can identify a product for the purposes of traceability.	Y	Identification is through job number on labels on sheet pallets through job number and record of date of despatch
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P003 Issue:3 9.4.09	Page 14 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

Audit Report

3.10.4	The system shall be tested to ensure traceability can be determined from raw material to finished product and vice versa. This shall take place on a predetermined frequency, at least on an annual basis, and results retained for inspection.	Y	Traceability system is periodically tested during audits. Last test on 25/2/11 on Be Modern job, W/O 116726 Spec 36592. Invoice number 175074 on 8/2/11 Sheet from Prowell o/No 116726/A raised 15/12/2010 125K/T-BC
3.11	Complaint Handling		
3.11	The company shall have a system for the effective capture, recording and management of product complaints.	Y	The NCR system Part 2 section 5 identifies and includes customer complaints. Registered on hard copy in office folder.
Statement of Intent			
3.11.1	All complaints shall be recorded, investigated and the results of the investigation documented.	Y	See above. Only 23 complaints in the year to date which is a significant improvement on 2009, but is being chased down by Senior Management with direct action.
3.11.2	Complaint data shall be analysed on a predetermined frequency to identify trends and used to implement ongoing improvements.	Y	Analysed continually as raised.
3.11.3	A corrective action plan shall be approved by a designated manager who shall ensure that such action is fully implemented and is effective in preventing a recurrence.	Y	This is always co-ordinated by the Operations Manager
3.12	Management of Incidents and Product Recalls		
3.12	The company shall have a plan and systems in place to effectively manage incidents in order to ensure that all potential risks to the quality and hygiene of products are controlled.	Y	Incident report procedure in place and utilised.
Statement of Intent			
3.12.1	The company shall provide written guidance to relevant staff regarding the type of event that would constitute an incident and a documented incident reporting procedure shall be in place.	Y	Procedures are well written, employees are trained to them
3.12.2	An effective documented Product Recall procedure shall be in place and shall be tested on a predetermined frequency and the results retained for inspection.	Y	Product recall system tested 25 th February 2011, Job reference 116726 Spec 36592 with Be Modern Jarrow
3.12.3	The recall procedure shall be capable of being operated at any time and will take into account notification to the supply chain, stock return, logistics for recovery, storage of recovered product and disposal. Arrangements for notifying relevant stakeholders within a specified time frame shall be defined within the procedure (e.g. contact details).	Y	The product recall system operates whenever the company is open

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P003 Issue:3
9.4.09

Page 15 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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3.12.4	A nominated manager shall be responsible for ensuring that preventive action is taken based on a review of incidents.	Y	Operations Manager
4.0	SITE STANDARDS		
4.1	Perimeter and Grounds		
4.1	All grounds within the site shall be finished and maintained to an appropriate standard.	Y	The area was examined during the site tour and found to be acceptable Concreted for vehicle loading areas. Plan to level the yard was raised at Management review.
Statement of Intent			
4.1.1	The external area shall be kept in good order and free from litter.	Y	The area was examined during the site tour and found to be acceptable, grass is well mown around back of factory
4.1.2	Where possible, a clean and unobstructed area shall be provided along the external walls of the building used for production and/or storage.	Y	Examined during the site tour and found to be acceptable – concrete/tarmac yard
4.1.4	External silos, pipe work or other access points for product and/or raw materials shall be appropriately sealed to prevent pest entry, ingress of water and other contaminants.	Y	No silos; examined during the site tour and found to be acceptable
4.1.5	External drains shall be properly protected to prevent entry of pests.	Y	Examined during the site tour and found to be acceptable, drain grates fitted
4.1.6	Where natural drainage is inadequate, external drainage shall be installed.	Y	No materials stored externally –paper!
4.1.8	Where external storage of raw materials is necessary these shall be protected from contamination.	Y	Nothing stored outside
4.1.9	External storage of refuse shall be in designated areas. Refuse shall be removed at appropriate intervals.	Y	Waste conveyed to compactor in yard; Foremans take paper waste for recycle. Examined during the site tour and found to be acceptable
4.2	Security		

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P003 Issue:3 9.4.09	Page 16 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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4.2	Security shall be maintained to prevent access of unauthorised persons to production and storage areas.	Y	Examined during the site tour and found to be acceptable, well fenced back yard
Statement of Intent			
4.2.1	All personnel including visitors and contractors shall only enter any part of the site through designated entrances.	Y	Clear signage at entry doors
4.2.2	Security shall be maintained to prevent the entry of unauthorised persons to the premises.	Y	Examined during the site tour and found to be acceptable
4.2.3	Based on hazard and risk analysis, procedures shall be in place to ensure the secure storage of raw materials, intermediate and finished products.	Y	Examined during the site tour and found to be acceptable; materials stored in warehouse on site.
4.3	Layout and Product Flow		
4.3	Premises and plant shall be logically designed, constructed and maintained to control the risk of product contamination.	Y	Examined during the site tour and found to be acceptable. Well laid out with transfer tracking from machines
Statement of Intent			
4.3.1	Process flow shall be maintained to prevent cross-contamination or damage to the product.	Y	Examined during the site tour and found to be acceptable
4.3.2	Work in progress shall be identified clearly and adequately protected.	Y	Work tickets on all jobs and WIP labels
4.3.3	Sorting or other activities involving the direct handling of product shall take place in areas that have, as a minimum, the same standards as production areas.	Y	Examined during the site tour and found to be acceptable
4.3.4	Customer returns shall not, where possible, enter finished goods areas without hygiene inspection and positive release. Activities that could produce a contamination risk, such as the removal of outer packaging, shall be carried out in a designated, segregated area.	Y	Quarantine area established. Products may only be released following Management investigation.
4.3.5	Entry into production areas shall be via properly designated entry routes and access points.	Y	Examined during the site tour and found to be acceptable

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P003 Issue:3
9.4.09

Page 17 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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Audit Report

Building Fabric			
4.4	Raw Material Handling, Preparation, Processing and Storage Areas		
4.4	The fabric of the site, buildings and facilities shall be suitable for the intended purpose.	Y	Excellent fabric and site condition. Viewed on site tour and found acceptable
Statement of Intent			
4.4.1	External walls shall be well maintained and of sound construction.	Y	Examined during the site tour and found to be acceptable
4.4.2	Where suspended ceilings exist they shall be accessible for inspection and cleaning where required.	Y	None
4.4.3	Suitable and sufficient lighting shall be provided for a safe working environment, correct operation of processes, effective inspection of product and cleaning.	Y	Metal halides covered, fluorescents in diffusers under mezzanine floor
4.4.4	Walls, floors, ceilings and pipe work shall be maintained in good condition and shall be capable of being kept clean.	Y	Examined during the site tour and found to be acceptable.
4.4.6	All internal drain openings shall be suitably protected against the entry of pests and odour.	Y	Examined during the site tour and found to be acceptable
4.4.7	Suitable and sufficient ventilation shall be provided.	Y	Examined during the site tour and found to be acceptable.
4.5 Maintenance of Plant and Equipment			
4.5	Equipment shall be designed for the intended purpose and adequately maintained to minimise the risk of product contamination.	Y	Modern casemakers, Bobst, EMBA and gluers
Statement of Intent			

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P003 Issue:3
9.4.09

Page 18 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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Audit Report

4.5.2	Equipment, including fixtures and fittings, shall be maintained to minimise the risk of product contamination.	Y	Examined during the site tour and found to be acceptable
4.5.3	Wooden equipment including desks, chairs, tables, etc. shall be kept clean, in good condition and free from splinters or other sources of physical contamination.	Y	Steel packing and sorting benches
4.5.5	Compressed air that comes into contact with the product shall be filtered and the equipment maintained to prevent contamination.	Y	No air directly onto the web
4.5.6	Temporary engineering and modifications using adhesive tape, cardboard or similar materials shall not be permitted, except in emergencies.	Y	None observed on the shop floor. Recorded by operator if present
4.5.7	When temporary modifications are made these shall be subject to a time limit and shall be recorded and scheduled for correction.	Y	See above, none evident.
4.5.8	Persons undertaking maintenance activities shall comply with site hygiene requirements, including those relating specifically to protective clothing, hand washing and personal hygiene.	Y	Operators do basic maintenance. Specialist repairs are done by Manufacturers or specialist contractor
4.5.9	Contractors involved in maintenance or repair activities shall be under the supervision of a nominated person.	Y	Operations Manager/ Print Supervisor
4.5.10	On completion of any maintenance work, machinery and equipment shall be clean and free from contamination hazards.	Y	Examined during the site tour and found to be acceptable
4.6	Staff Facilities		
4.6	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	Examined during the site tour and found to be acceptable
Statement of Intent			
4.6.2	Toilets shall be provided with hand-washing facilities comprising basins with soap and water available at a suitable temperature with adequate hand-drying facilities and waste containers, as necessary.	Y	Examined during the site tour and found to be acceptable; wash-hands signs in lavatories;
4.6.3	Advisory signs shall be in place to prompt hand washing where required.	Y	Hand wash signs in lavatories
4.6.4	All equipment and surfaces in rest facilities shall be clean, well maintained and of suitable construction.	Y	Canteen examined during the site tour and found to be acceptable,

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P003 Issue:3
9.4.09

Page 19 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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4.6.5	Lockers shall be provided for all personnel who work in raw material handling, processing, preparation, packing and storage areas. Lockers shall be of sufficient size to accommodate all reasonable personal items.	Y	Locker room examined during the site tour and found to be acceptable
4.6.7	Eating, drinking and smoking shall not be allowed in locker and changing rooms.	Y	Examined during the site tour and found to be acceptable, no-smoking site
4.6.8	Facilities for visitors and contractors shall enable compliance with the company's hygiene policy.	Y	Satisfactory arrangements and PPE in place
4.6.10	All food brought into manufacturing premises shall be held in sealed containers, in an appropriate area which shall be kept in a clean and hygienic state.	Y	Checked in fridge nothing past use-by date.
4.6.11	Designated controlled smoking areas shall be isolated from production areas to an extent that ensures smoke cannot reach the product. Where smoking is allowed under national law, sufficient extraction to the exterior of the building shall be ensured. Adequate arrangements for dealing with smokers' waste shall also be provided at smoking facilities, both inside buildings and at external locations. Facilities shall be available, with adequate reminders, for hand washing after smoking.	Y	No smoking at all in factory.
4.6.12	Canteen and food waste shall be stored in suitably lined and lidded containers.	Y	Examined during the site tour and found to be acceptable
4.7	Housekeeping and Cleaning		
4.7	Housekeeping and cleaning systems shall be in place which ensure that appropriate standards of hygiene are maintained and that risk of contamination to the product is minimised.		
Statement of Intent		Y	The site is very clean and tidy. Appropriate controls are in place and are monitored with internal audits
4.7.1	Good standards of housekeeping shall be maintained which shall include a 'clean as you go' policy.	Y	See above.
4.7.2	All internal surfaces of the building shall be kept free from excessive dust, dirt and cobwebs.	Y	Examined during the site tour and found to be acceptable
4.7.3	Where possible, an adequate gap shall be provided around the internal perimeter to facilitate cleaning and inspection.	Y	Examined during the site tour and found to be acceptable gap

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P003 Issue:3 9.4.09	Page 20 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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4.7.4	<p>All internal surfaces of buildings, equipment and vehicles shall be subject to documented scheduled cleaning, which shall cover all areas of the site with particular reference to production and storage areas.</p> <p>Cleaning schedules shall include the following information:</p> <ul style="list-style-type: none"> • responsibility for cleaning • item/area to be cleaned • frequency of cleaning • method of cleaning • cleaning materials to be used • cleaning record checks. 	Y	All surfaces, equipment and vehicles are subject to documented cleaning recorded on the cleaning records weekly.
4.7.5	Tools and other maintenance equipment shall be cleared away after use and appropriately stored.	Y	This is documented in production records.
4.7.6	Cleaning equipment and materials shall be kept in a designated location.	Y	Yes, locked away when not in use.
4.7.7	Workstations shall be kept in good order and potential physical contamination hazards properly controlled.	Y	Examined during housekeeping audits e g 24/05/11audit.
4.7.8	Cleaning chemicals shall be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers' instructions.	Y	Examined during the site tour and found to be acceptable
4.7.9	Chemicals that are strongly scented or could give rise to taint and odour contamination shall not be used.	Y	None seen during the site tour; found to be acceptable
4.7.10	Materials and equipment used for cleaning toilets shall be segregated from those used elsewhere.	Y	Stored separately. Examined during the site tour and found acceptable
4.8	Waste and Waste Disposal		
4.8	Suitable facilities shall be provided for the storage and disposal of process and other waste.	Y	Compactor for waste, good extract system for trim through to compacter
Statement of Intent			
4.8.1	Suitable and sufficient refuse and waste containers shall be provided which shall be emptied at appropriate frequencies and maintained in an adequately clean condition.	Y	Bins and skips

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P003 Issue:3
9.4.09

Page 21 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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4.8.2	Waste containers shall be suitably labelled or marked.	Y	Examined during the site tour and found to be acceptable
4.8.3	Where agreed with the customer, suitable and sufficient containers shall be provided for collection of substandard trademarked materials. Where agreed, such materials shall be rendered unusable through a destructive process. All materials disposed of shall be recorded.	Y	All sub standard goods are destroyed by recycling.
4.8.4	If substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be a specialist in appropriate waste disposal and shall provide records of material destruction.	Y	Examined during the site tour and found to be acceptable
4.8.5	The company shall ensure that third-party waste disposal contractors are licensed in accordance with the requirements of local law.	Y	Foremans are Licensed Waste Carriers.
4.9	Pest Control		
4.9	The company shall be responsible for minimising the risk of pest infestation on the site.		
Statement of Intent		Y	Deadfast Pest Control Services. BPCA member M15/540 to January 2011 and NPTA member 0582: 8 routine visits per annum + 1 EFK service. Follow up as required
4.9.1	A preventive pest control programme shall be maintained at manufacturing, storage and transport facilities under the company's control.	Y	Program covers rodents and crawling insects and EFK's. Have more CI detectors in Warehouse. EFK's are shown on the site plan
4.9.2	Unless competent in-house expertise exists, a competent pest control company shall be contracted. The company shall ensure, by regular audit that the system is fully implemented by the contractor and is effective.	Y	Deadfast is BPCA current member and long established.
4.9.3	The frequency of inspections shall be determined by hazard and risk analysis. Pest control staff shall be suitably trained to carry out inspection and control.	Y	Every 6 weeks. Proficiency certificates in folder
4.9.4	Effective precautions shall be in place to prevent pests entering the premises. The building shall be suitably proofed against the entry of all pests via doors, windows, ducts and cable entry points.	Y	Examined during the site tour and found to be acceptable.
4.9.5	An up-to-date site plan shall indicate positions of baiting points and flying insect control devices. These shall not be positioned in areas where dead insects can contaminate packaging materials. If there is a danger of insects being expelled from any extermination device and contaminating the product, alternative systems and equipment shall be used.	Y	Examined during the site tour and in Manual, baits are numbered on plan

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P003 Issue:3 9.4.09	Page 22 of 31	Report No: UK/BRC/235	Auditor: B L Fowler
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4.9.6	In the event of infestation, immediate action shall be taken to eliminate the hazard. Action shall be taken to identify, evaluate the potential for contamination or damage and authorise the release of any product potentially affected.	Y	Examined during the site tour and found to be acceptable .
4.9.8	It shall be the responsibility of the company to ensure all the relevant recommendations made by the contractor or in-house expert are implemented in a timely manner and monitored for effectiveness.	Y	Recommendations made by contractor ; site is well secured.
4.9.9	Written procedures and activity documentation shall be maintained.	Y	Examined in Hygiene Manual and Pest manual and found to be acceptable
4.10	Transport, Storage and Distribution		
4.10	The transport, storage and distribution of raw materials and finished products shall be undertaken in a manner to minimise the risk of contamination.	Y	Company uses own vehicles - three
Statement of Intent			
4.10.1	All finished products and materials transferred between premises, shall be protected during transit and storage by appropriate external packaging or transported under conditions to protect product from contamination, including taint or odour.	Y	Products are not transferred between premises
4.10.2	All pallets shall be checked. Damaged, contaminated or unacceptable pallets shall be discarded.	Y	Inspected and rejected if found to be unsuitable.
4.10.3	Vehicle drivers shall comply with the site rules relevant to this Standard.	Y	Van Drivers are company employees and obey all of the rules
4.10.4	All vehicles used for deliveries shall be kept clean and in a condition to minimise the risk of product contamination.	Y	Checked on cleaning schedules, on site today, physically checked NTRS 93 trailer on vehicle TTP and seen to be clean and free from internal damage
4.10.6	All delivery vehicles and shipping containers shall be subject to a hygiene-checking procedure before loading.	Y	As above.
4.10.7	Storage, including off-site storage, shall be controlled to protect product from contamination including taint or odour. Where off-site storage is used the same requirements apply as for on-site storage.	Y	Segregation in warehouse on racks.
5.0	PRODUCT AND PROCESS CONTROL		

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P003 Issue:3
9.4.09

Page 23 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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Audit Report

5.1	Product Design and Development		
5.1	Product design and development processes shall be in place to ensure the production of safe products to defined quality parameters.	Y	Satisfactory. Contract review and quotation records the application by the customer where known
Statement of Intent			
5.1.1	Where appropriate, customer design requirements shall be defined and agreed prior to undertaking product design.	Y	As above
5.1.2	Where appropriate, a process shall be in place to ensure final product concepts or art work are formally accepted by the specifier.	Y	Proof usually approved by customer before press pass-off.
5.1.3	The company shall ensure that the product design processes, procedures and records of design together result in the development of specifications for each manufacturing process step to ensure the production of safe and legal products of the prescribed quality.	Y	Standard print and finishing processes
5.1.4	Samples agreed with the specifier shall be retained for future reference.	Y	Retained for duration of job.
5.2	Process Control		
5.2	Procedures shall be in place to ensure effective control of operations throughout the process.	Y	Work instructions and process machines are included in Work Ticket.
Statement of Intent			
5.2.1	The company shall operate procedures that verify that the processes and equipment used are capable of producing safe and legal products to the prescribed quality within the process specification as defined by the hazard and risk management process.	Y	Dies control product size. Colour is calibrated by Pantone and operator using colour standards. Quality is determined by functionality and visual appearance.
5.2.2	Based on hazard and risk analysis, procedures for monitoring incoming materials shall be specified and documented. Suppliers of incoming materials, as appropriate, shall provide evidence of conformity.	Y	All goods inward checked as per procedure Part 2 Section 7 of GMP Manual
5.2.3	In order to prevent contamination, procedures shall be in place to appropriately segregate raw materials, intermediate and finished products.	Y	All stages of manufacturing are segregated.

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P003 Issue:3
9.4.09

Page 24 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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5.2.4	Material intended for recycling shall be appropriately protected against contamination hazards.	Y	Material disposed of by Foremans for recycling – well known in the North-East
5.2.5	In the event of changes to product formulation, processing methods or equipment, the company shall, where appropriate, re-establish process characteristics and validate product data to ensure product safety, legality and quality is achieved.	Y	Plates are renewed and proofing is re-established..
5.2.6	Non-conforming materials or customer-returned product shall be subject to inspection and positive release before any alternative use.	Y	There are no alternative uses, rejects can only be inspected out and defects scrapped.
5.3	Product Inspection and Analysis		
5.3 Statement of Intent	The company shall use appropriate procedures and facilities when undertaking or subcontracting inspection and analyses critical to product safety, legality and quality.	Y	Standard industry methods are used for the various products.
5.3.1	Quality checks shall be carried out to demonstrate that the product is within the tolerances laid down in the agreed product specification.	Y	Checks undertaken continuously as defined by the Job instructions in the work Ticket.
5.3.2	Procedures shall be in place to ensure the reliability of test results.	Y	Process controls for product integrity. Production Procedures Part 2, Section 7 of GMP Manual
5.3.3	Personnel undertaking analyses shall be suitably qualified and/or trained and shall be competent to carry out the analyses required.	Y	Satisfactory.
5.3.4	Frequency of checks shall be in accordance with industry-accepted practice based on hazard and risk analysis.	Y	Checks per Job ticket, reflecting customer requests or history of the customer.
5.3.5	Where the company undertakes or subcontracts analyses critical to product safety or legal compositional verification to a laboratory, the laboratory shall use agreed and documented test methods and sampling procedures.	Y	Not applicable, no work is subcontracted.
5.3.6	Subcontracted laboratories, as appropriate, shall be independently accredited by a recognised or agreed competent body.	Y	Use sheet or ink suppliers' laboratories for testing if problems identified.
5.4	In-line Testing Equipment		
5.4 Statement of Intent	The company shall use hazard and risk analysis principles to determine the need for in-line product testing equipment to ensure the integrity and quality of products.	Y	No in-line tests, apart from visual
5.4.1.	The accuracy of measurement of in-line equipment shall be specified having due regard to the product parameter being controlled.	Y	Not precision manufacturing. Fit for purpose meeting colour standards.

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P003 Issue:3
9.4.09

Page 25 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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5.4.2	The company shall establish and implement procedures for the operation, routine monitoring and testing of equipment. This shall include: <ul style="list-style-type: none"> • frequency and sensitivity of checks • authorisation of trained personnel to carry out specified tasks • documentation of test results. 	Y	Pantone swatch and spectrophotometer used as a comparator against the customer approved proof. The company are printing onto Corrugated sheet
5.4.3	In-line testing equipment critical to product integrity or safety shall incorporate a system to identify and, where appropriate, divert non-conforming product out of the product flow.	Y	No in line testing equipment
5.4.4	The company shall establish and implement corrective action and reporting procedures in the event of the monitoring and testing procedure identifying any failure of the in-line test equipment. Any such failures shall be subject to an assessment of potential risk and subsequent action may include a combination of isolation, quarantine and re-inspection of products produced since the last acceptance test of the equipment.	Y	Full Quarantine processes in place to identify returned goods and defectives.
5.5	Calibration		
5.5 Statement of Intent	Measuring equipment used to monitor critical manufacturing process points and product safety and legality shall be calibrated to a recognised national standard.	Y	None used
5.5.1	Measuring equipment used to monitor critical manufacturing process points and the product's compliance with relevant legal requirements and specifications, shall be identified and calibrated. Where possible, this shall be traceable to a recognised national standard.	Y	Pantone swatches checked annually against retained standard and renewed where necessary.
5.5.2	Where a traceable calibration is not possible, the company shall demonstrate the basis by which standardisation is carried out.	Y	Pantones are a guide to colour for mixing. Formes and slitting determine box size
5.5.3	All identified measuring equipment shall be checked and adjusted at a predetermined frequency, based on hazard and risk analysis. This shall be carried out by trained staff to a defined method to ensure accuracy within defined parameters.	Y	See above
5.5.4	The identified measuring equipment shall be marked in accordance with calibration requirements.	Y	See above
5.5.5	The identified measuring equipment shall be prevented from adjustment by unauthorised staff and shall be protected from damage, deterioration and misuse.	Y	See above
5.5.6	Results and any actions taken when measuring equipment is found to be operating outside the specified limits shall be documented.	Y	See above
5.6	Control of Non-conforming Product		

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P003 Issue:3
9.4.09

Page 26 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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5.6 Statement of Intent	The company shall ensure that out-of-specification product is clearly identified, labelled and quarantined.	Y	Reject product is promptly identified and is processed/scrapped very soon after.
5.6.1	Clear procedures for the control of out-of-specification, non-conforming materials shall be in place and understood by all authorised personnel. This may include rejection, acceptance by concession or authorisation for an alternative use.	Y	See above. Reject product is promptly identified and is processed very soon after. Materials are only released by General Manager's authority.
5.6.2	Corrective actions shall be implemented to avoid recurrence of the non-conformance. Actions taken shall be documented.	Y	The Company records and monitors corrective actions.
5.7	Foreign Body Control		
5.7 Statement of Intent	All practicable steps shall be taken to identify, avoid, eliminate or minimise the risk of foreign body contamination.	Y	PRP's in place to prevent contamination, checked with housekeeping audits.
5.7.1	Training shall be given to all relevant staff in the avoidance and detection of foreign bodies.	Y	Hygiene training records have been completed per training records; detailed in Management review. Training folder for each individual operative – checked Lee Airey – Production Operator, Dawn Anderson, EMBA gluer, Sandra Gough, stitcher
5.7.2	A written policy and documented controls shall be in place for: <ul style="list-style-type: none"> • non-production glass • brittle plastics • all materials used in the construction, fixture and fittings of the production area which could be confused with packaging material. 	Y	Contained in manual - Part 2 Section 9
5.7.3	There shall be no unnecessary non-production glass or brittle plastic which may pose a risk of contamination. Necessary glass and brittle plastic shall be maintained in good condition and protected, where possible, against breakage.	Y	Examined during the site tour and found to be acceptable
5.7.4	Based on hazard and risk analysis and where they constitute a risk of glass contamination, all bulbs and strip lights, including those on flying insect control devices shall be protected.	Y	Covered metal halides and diffused fluorescents
5.7.6	Where damage occurs that poses a risk of contamination, a responsible person shall be placed in charge of the clean-up operation and ensure that no other area is allowed to become contaminated due to the breakage.	Y	Detailed in glass breakage procedure
5.7.7	Any product that has become contaminated shall be segregated and disposed of. A relevant quarantine procedure shall apply after any incident.	Y	Examined during the site tour and found to be acceptable

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P003 Issue:3 9.4.09	Page 27 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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5.7.8	All breakages that pose a risk of product contamination shall be recorded in an incident report.	Y	None seen to be broken during tour
5.7.9	There shall be a documented policy for the control of the use of sharps.	Y	Examined during the site tour and found to be acceptable
5.7.10	Sharp blades, equipment and tools shall not be left in a position that allows them to contaminate the product.	Y	Examined during the site tour and found to be acceptable
5.7.11	Sharp cutting instruments used in the manufacture of packaging materials shall be controlled to prevent product contamination. This shall include control into and out of the factory where they shall be disposed of in a sealable container when no longer usable.	Y	Examined during the site tour and found to be acceptable
5.7.12	Snap-off blade knives shall not be used.	Y	None seen during tour of site. Procedure Part 2 section10 controls knife blades.
5.7.13	Where open notice boards are present, loose fastenings such as drawing pins and staples shall not be used.	Y	Examined during the site tour and found to be acceptable, no pins or staples seen in notice boards. Large steel stitches are used for joints for high strength, well controlled for no contamination.
5.7.14	Notices on equipment shall be cleanable and secure.	Y	Examined during the site tour and found to be acceptable
5.8	Chemical and Biological Control		
5.8 Statement of Intent	Controls shall be in place to prevent contamination from chemical or biological hazard.	Y	Examined during the site tour and found to be acceptable
5.8.1	Chemicals including cleaning materials, lubricants and adhesives shall be of the appropriate grade and be suitably controlled to prevent contamination of the product.	Y	Examined during the site tour and found to be acceptable
6.0	Personnel Raw Material Handling, Preparation, Processing, Packing and Storage Areas		
6.1	Training		

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P003 Issue:3 9.4.09	Page 28 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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Audit Report

6.1 Statement of Intent	The company shall ensure that all employees are adequately trained, instructed and supervised commensurate with their activity.	Y	Training is detailed in section 7, Part 1. Folder for every employee plus training programmes.
6.1.1	All personnel, including temporary personnel, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period. Induction training shall include the company hygiene rules.	Y	Induction records for all staff. Job specific training assessment and pack
6.1.2	The company shall routinely review the competencies of staff and provide relevant training as appropriate. This shall cover all packaging quality assurance, potential contamination and safety hazards, including those specific to established critical process steps.	Y	Training has been done, See samples above
6.1.3	Records of training shall be kept for all current and recent key employees.	Y	All employees have training records.
6.1.4	A programme of refresher training shall be in place.	Y	Training brochure by Gareth Jones seen on Max Gluer Manual
6.2	Access and Movement of Personnel		
6.2 Statement of Intent	The company shall ensure that access and movement of personnel, visitors and contractors shall not compromise standards of product quality.	Y	Small site, defined walkways
6.2.1	If it is necessary to allow access through production areas, designated walkways shall be provided that ensure there is adequate segregation from materials.	Y	Examined during the site tour and found to be acceptable
6.2.2	All facilities shall be designed and positioned, where possible, so that movement of personnel is by simple, logical routes.	Y	Examined during the site tour and found to be acceptable
6.2.3	Contractors and visitors including drivers shall be made aware of all procedures for the premises and the requirements of the areas they are visiting with special reference to hazards and potential product contamination.	Y	Visitors sign in at reception. Comprehensive rules on sign-in sheet
6.3	Personal Hygiene		
6.3 Statement of Intent	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	Advised on induction.
6.3.1	The company shall document its jewellery policy.	Y	Well-defined policy; no unauthorised jewellery seen

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P003 Issue:3 9.4.09	Page 29 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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Audit Report

6.3.2	Jewellery shall not be worn, with the exception of a plain wedding ring, a wedding wristband and sleeper earrings (continuous loop). Rings and studs in exposed parts of the body, such as noses, tongues and eyebrows, shall not be worn.	Y	Conforming. No banned jewellery observed on site tour. Watches are worn as permitted in the standard Category 2
6.3.4	Personal items and belongings including personal mobile telephones shall not be taken into production areas.	Y	See above
6.3.5	Drinking of water from purpose-made dispensers and/or by using disposable conical cups or spill-proof containers, may be allowed provided it is confined to a designated area away from equipment.	Y	Satisfactory facilities in place and are monitored for effectiveness.
6.3.6	Procedures shall be in place to control the use of personal medicines to minimise the risk of contamination of product.	Y	Hygiene Part 2 section 15 of GMP Manual
6.3.7	All personnel, visitors and contractors shall wash their hands after using the toilet, eating, smoking or drinking (unless drinking only water in accordance with the conditions set out in clause 6.3.6) and whenever otherwise necessary.	Y	Satisfactory procedures in place and are monitored for effectiveness
6.3.8	Fingernails shall be kept short and clean. False fingernails and nail varnish/polish shall not be used.	Y	Satisfactory procedures in place and are monitored for effectiveness
6.3.9	If gloves are used, they shall be replaced regularly. Where appropriate gloves shall be of a disposable type, of a distinctive colour, be intact and not shed loose fibres.	Y	Gloves are of a suitable colour
6.3.10	Eating (including the eating of confectionery and chewing of gum or tobacco), drinking and smoking shall not be allowed in the production or packing areas. If it is impractical for personnel to leave their work area, local controlled facilities (such as a fully walled area with hand-washing facilities if appropriate) shall be provided.	Y	Satisfactory procedures in place and are monitored for effectiveness
6.4	Medical Screening		
6.4 Statement of Intent	Health conditions likely to adversely affect product safety shall be monitored and controlled.	Y	Health questionnaire in place
6.4.1	Personnel shall report if they are suffering from, or have been in contact with, any disease likely to be transmitted through high-risk products, from infected wounds, skin complaints or gastrointestinal illness. Employees and visitors suffering from any of the above shall be excluded from work involving contact with packaging for as long as the symptoms persist.	Y	All employees are trained to report infectious illnesses.
6.4.2	Visitors and contractors shall be required to fill in a health questionnaire prior to being allowed into production areas within the scope of the Standard.	Y	Signed by auditor at entry

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P003 Issue:3
9.4.09

Page 30 of 31

Report No: UK/BRC/235

Auditor: B L Fowler

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Audit Report

6.4.3	All cuts and grazes on exposed skin shall be covered by an appropriately coloured plaster different from the product colour (preferably blue), and containing a metal detectable strip where metal detection equipment is in use. These shall be company issued and monitored. Where appropriate, in addition to the plaster, a finger stall shall be worn, different from the product colour (preferably blue).	Y	Blue metal detectable plasters used.
6.5	Protective Clothing		
6.5 Statement of Intent	Appropriate protective clothing shall be worn to minimise the risk of product contamination.	Y	Clothing is fit for purpose.
6.5.1	Appropriate clean protective clothing that cannot contaminate the product shall be worn.	Y	See above.
6.5.2	Sufficient sets of clothing shall be provided appropriate to the activities carried out.	Y	Employees issued with 4 polo shirts and trousers
6.5.4	Based on hazard and risk analysis, a policy shall be documented and implemented to state where protective clothing can be worn away from the production environment.	Y	Not considered to be a hazard.
6.5.7	Protective clothing shall be kept clean and laundered. Laundering shall be carried out by one of the following methods: professional laundry service, in-house, controlled laundering facilities or self care.	Y	Self care
6.5.8	Self-care shall be permitted provided adequate controls and appropriate guidelines are in place. There shall be a defined process for monitoring the effectiveness of the system.	Y	BRC guidelines in place
6.5.9	Clean and dirty clothing shall be segregated and controlled to prevent cross-contamination.	Y	Segregation system in place.

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P003 Issue:3 9.4.09	Page 31 of 31	Report No: UK/BRC/235	Auditor: B L Fowler

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