# Audit Report

## Global Standard Packaging and Packaging Materials Issue 5: July 2015

### Audit summary

<table>
<thead>
<tr>
<th>Company name</th>
<th>National Flexible Ltd</th>
<th>BRC site code</th>
<th>2113728</th>
</tr>
</thead>
<tbody>
<tr>
<td>Site name</td>
<td>Bradford</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Hygiene Category</td>
<td>High Hygiene</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Audit scope

<table>
<thead>
<tr>
<th>Scope of audit</th>
<th>Flexo printed, laminated, polypropylene, polyethylene, amorphous polyethylene Terephthalate, polyamide, surlyn, barrier coatings, antifog, metallised; APET, OPA, EVOH, OPP, LLDPE, PVdC; slit, rewind and hot needle perforation.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Exclusions from scope</td>
<td>None</td>
</tr>
<tr>
<td>Justification for exclusion</td>
<td>N/A</td>
</tr>
</tbody>
</table>

### Voluntary modules included

<table>
<thead>
<tr>
<th>Modules</th>
<th>Result</th>
<th>Details</th>
</tr>
</thead>
<tbody>
<tr>
<td>Choose a module</td>
<td>Choose an item</td>
<td></td>
</tr>
<tr>
<td>Choose a module</td>
<td>Choose an item</td>
<td></td>
</tr>
</tbody>
</table>

### Audit results

<table>
<thead>
<tr>
<th>Audit result</th>
<th>Certificated</th>
<th>Audit type</th>
<th>Announced</th>
</tr>
</thead>
<tbody>
<tr>
<td>Audit grade</td>
<td>AA</td>
<td>Previous audit grade</td>
<td>AA</td>
</tr>
</tbody>
</table>

### Number of non-conformities

<table>
<thead>
<tr>
<th></th>
<th>Major against SOI of Fundamental</th>
<th>Critical</th>
<th>Major</th>
<th>Minor</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0</td>
<td>0</td>
<td>0</td>
<td>4</td>
</tr>
</tbody>
</table>
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### Company details

<table>
<thead>
<tr>
<th>Address</th>
<th>2 Battlefield View, Birkenshaw, Bradford, BD11 2PT</th>
</tr>
</thead>
<tbody>
<tr>
<td>Country</td>
<td>UK</td>
</tr>
<tr>
<td>Commercial representative Name</td>
<td>Chris Melody</td>
</tr>
<tr>
<td>Technical representative Name</td>
<td>Caroline Clay</td>
</tr>
<tr>
<td>Telephone</td>
<td>01274 685566</td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:chris@nationalflexibles.net">chris@nationalflexibles.net</a></td>
</tr>
<tr>
<td>Email</td>
<td><a href="mailto:caroline@nationalflexible.net">caroline@nationalflexible.net</a></td>
</tr>
</tbody>
</table>

---

### Company profile

<table>
<thead>
<tr>
<th>Plant size (square metres)</th>
<th>&lt;10K sq.m</th>
<th>No. of employees</th>
<th>1-50</th>
<th>No. of key processes</th>
<th>1-3</th>
</tr>
</thead>
<tbody>
<tr>
<td>Subcontracted processes</td>
<td>Yes</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other certificates held</td>
<td>ISO9001:2008</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Regions exported to</td>
<td>None</td>
<td>Choose a region</td>
<td>Choose a region</td>
<td>Choose a region</td>
<td></td>
</tr>
<tr>
<td>Major changes or auditor observations since last BRC audit</td>
<td>No major changes since the last assessment</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Company description</td>
<td>The Company continues to grow in terms of throughput and volumes with no significant changes to products, machinery or key personnel. The company was established over 40 years ago and moved to its purpose built premises 9 years ago, which is located on a light industrial estate in Birkenshaw, to the south-east of Bradford. The company procures and supplies plain and printed film primarily for the UK marketplace with some films supplied to the EU. The artwork process is managed in-house. All films are produced to meet Customers’ specific needs. Stock is held on site and called off by Customers as and when required. The buildings are 2,415 square metres. Plant machinery and general conditions of the site are suitable for the supply of food grade packaging products. There</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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Company profile

are just 45 personnel operating a double day, rotating shift system. There would never be more than 35 employees on site at any time. The Directors mission is to establish an operation at the forefront of technology, aiming for the highest quality of packaging and selling high quality print and packaging products in a safe and highly efficient environment.

The technical team continually offers advice on new or alternative films which extend product shelf life. The company prides itself on achieving rapid turnaround wherever necessary to meet Customers’ demands. Quality and service is at the forefront of the company’s ethos, in addition to ensuring that all aspects of the product integrity, safety and legality are properly maintained.

The company has developed compliance systems in accordance with ISO 9001:2008 and the requirements of the BRC Global Standard for Packaging and Packaging Materials.
# Product and process characteristics

<table>
<thead>
<tr>
<th>Field of Audit</th>
<th>Category</th>
</tr>
</thead>
<tbody>
<tr>
<td>Glass</td>
<td>Category</td>
</tr>
<tr>
<td>Paper</td>
<td>Category</td>
</tr>
<tr>
<td>Metal</td>
<td>Category</td>
</tr>
<tr>
<td>Rigid plastic</td>
<td>Category</td>
</tr>
<tr>
<td>Flexible plastic</td>
<td>Category</td>
</tr>
<tr>
<td>Wood and other material</td>
<td>Category</td>
</tr>
<tr>
<td>Print</td>
<td>Category</td>
</tr>
<tr>
<td>Chemical processes</td>
<td></td>
</tr>
</tbody>
</table>

Products in production at the time of the audit: Films of varying sizes and types being slit and perforated for sundry products ranging from confectionery to bakery products to pharmaceutical applications.

## Audit duration details

<table>
<thead>
<tr>
<th>Finish date</th>
<th>2017-02-10</th>
</tr>
</thead>
<tbody>
<tr>
<td>Re-audit due date</td>
<td>2018-02-22</td>
</tr>
<tr>
<td>Previous audit date</td>
<td>2016-02-05</td>
</tr>
<tr>
<td>Duration of production facility inspection</td>
<td>4 hours</td>
</tr>
<tr>
<td>On-site duration</td>
<td>12 hours</td>
</tr>
</tbody>
</table>

Reasons for deviation from typical or expected audit duration: Compliant with audit duration calculator, 45 personnel in total operating on a double day shift and the total site is just 2415 square metres in size. Simple operations on replicated machinery.

Next audit type selected: Announced

## Audit duration per day

<table>
<thead>
<tr>
<th>Audit days</th>
<th>Date</th>
<th>Audit start time</th>
<th>Audit finish time</th>
</tr>
</thead>
<tbody>
<tr>
<td>1 (start date)</td>
<td>2017-02-09</td>
<td>11:45</td>
<td>15:45</td>
</tr>
<tr>
<td>2</td>
<td>2017-02-10</td>
<td>08:00</td>
<td>16:00</td>
</tr>
</tbody>
</table>

## Auditor information

<table>
<thead>
<tr>
<th>Auditor number</th>
<th>Auditor Name</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>110024</td>
<td>Simon Martin</td>
<td>Lead Auditor</td>
</tr>
</tbody>
</table>

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### Present at audit

<table>
<thead>
<tr>
<th>Name / Job Title</th>
<th>Opening meeting</th>
<th>Site inspection</th>
<th>Procedure review</th>
<th>Closing meeting</th>
</tr>
</thead>
<tbody>
<tr>
<td>Chris Melody, Operations Director</td>
<td>x</td>
<td></td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Caroline Clay, Quality Manager</td>
<td>x</td>
<td>x</td>
<td>x</td>
<td>x</td>
</tr>
<tr>
<td>Scott McEvoy, QA Technical Engineer</td>
<td></td>
<td></td>
<td>x</td>
<td></td>
</tr>
<tr>
<td>Craig Robinson, Production Supervisor</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Dave Harland, Production Operative</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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)

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## Non-Conformity Summary

### Major non-conformity against statement of intent of a fundamental requirements

<table>
<thead>
<tr>
<th>No.</th>
<th>Requirement ref.</th>
<th>Details of non-conformity</th>
<th>Critical or Major?</th>
<th>Anticipated re-audit date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Critical

<table>
<thead>
<tr>
<th>No.</th>
<th>Clause</th>
<th>Details of non-conformity</th>
<th>Anticipated re-audit date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

### Major

<table>
<thead>
<tr>
<th>No.</th>
<th>Clause</th>
<th>Details of non-conformity</th>
<th>Correction</th>
<th>Proposed preventive action plan (based on root cause analysis)</th>
<th>Evidence provided document, photograph, visit/other</th>
<th>Date reviewed</th>
<th>Reviewed by</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
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<th>Evidence provided document, photograph, visit/other</th>
<th>Date reviewed</th>
<th>Reviewed by</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>2.2.5</td>
<td>Hazards relating to the potential for unintended migration have not been considered as part of the Hazard Analysis</td>
<td>HACCP Meeting has been held 6/3/2017</td>
<td>The purchasing section of the risk assessment in the HACCP plan has now been amended. It will be reviewed annually</td>
<td>Amended section 3 of the HACCP Meeting Minutes, and purchasing section of the HACCP Plan provided</td>
<td>2017-03-10</td>
<td>Simon Martin</td>
</tr>
<tr>
<td>2</td>
<td>3.9.4</td>
<td>A raw material to finished goods trace test has not been documented with the results retained for inspection during the last 12 months</td>
<td>Site to complete raw material to finished traceability check</td>
<td>Added to the internal audit schedule to be completed twice a year</td>
<td>Copies of the traceability test provided</td>
<td>2017-03-10</td>
<td>Simon Martin</td>
</tr>
<tr>
<td>3</td>
<td>4.4.2</td>
<td>A fire exit was observed to be left open during the site tour</td>
<td>Fire doors to be kept closed when not in use</td>
<td>New sign added to the offending door. Tool box talk held with Warehouse and production to reemphasise the importance of keeping fire doors shut when not in use</td>
<td>Copies of sheets signed by warehouse and production staff provided</td>
<td>2017-03-10</td>
<td>Simon Martin</td>
</tr>
<tr>
<td>4</td>
<td>5.4.4</td>
<td>Currently documented equipment process checks are currently not being undertaken to ensure the correct length on slit reels is being achieved</td>
<td>Meter reels held on machine are not used on both machines as we sell by weight only</td>
<td>Stanford Machine meter is now to be taken off. EB2 machine has been added to the calibration schedule to be calibrated by D. Brash and son</td>
<td>Before and after photo of Stanford machine. Calibration Schedule for EB2 machine provided</td>
<td>2017-03-10</td>
<td>Simon Martin</td>
</tr>
</tbody>
</table>
Comments on non-conformities – not tagged, just free text. This is to explain where a large number of NCs have been raised without a major

Voluntary Modules Non-Conformity Summary Sheet

<table>
<thead>
<tr>
<th>Critical</th>
<th>No.</th>
<th>Clause</th>
<th>Details of non-conformity</th>
<th>Anticipated re-audit date</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

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

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<th>Evidence provided document, photograph, visit/other</th>
<th>Date reviewed</th>
<th>Reviewed by</th>
</tr>
</thead>
</table>

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### Detailed Section

#### 1. Senior management commitment

<table>
<thead>
<tr>
<th>1.1</th>
<th>Senior management commitment and continual improvement</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>The company has established a Product Safety &amp; Quality Management Policy Statement. The statement commits to supplying Customer with products which are safe and legal and also commits to a program of continuous improvement confirming the company’s responsibility to its Customers. The policy is dated 05.01.17 and is signed by George Slack – M.D. The policy is reviewed during the annual Management Review meeting and is communicated to all employees through staff notice boards and via the induction process. There are measurable quality objectives in place that are set at the annual Management Review meeting for the coming year. There are several quality targets for 2017. Examples as follows: -</td>
</tr>
<tr>
<td></td>
<td>• Customer Complaints not to exceed 1.2% of all orders placed.</td>
</tr>
<tr>
<td></td>
<td>• Maintain AA grade for BRC audit</td>
</tr>
<tr>
<td></td>
<td>• Internal audits completed on time to schedule</td>
</tr>
<tr>
<td></td>
<td>• Corrective actions to be completed within 28 days</td>
</tr>
<tr>
<td></td>
<td>• Food safety training to be completed by end of Q1 2016</td>
</tr>
<tr>
<td></td>
<td>There are other operational KPI’s in place that feed into the main site wide Quality objectives which are monitored on an ongoing basis by the Senior Team on site. There is a dedicated BRC Management Representative on site in the form of Caroline Clay – Quality Manager with Scott McEvoy – QA Technical Co-Coordinator as dedicated BRC Deputy. The BRC team are fully supported by Senior and Departmental Management. The Product Safety &amp; Quality Management System is well established and has been effective since the BRC Packaging standard was introduced. It was apparent during the audit that ample human and financial resource are in place. The Quality Manager reviews scientific and legislative updates on a monthly basis and disseminates findings and relevant information through the company hierarchy where applicable. Publications such as “Packaging News” and “Plastics Weekly” are subscribed to and act as an additional information source. Relevant websites are regularly reviewed such as the BRC Website, the government website for food contact materials (<a href="http://www.food.gov.uk">www.food.gov.uk</a>) and the European Website for food safety (ec.europa.eu). The company ensures materials are safe for use with food and has Declarations of Compliance in place for all products produced at the site which are sent to Customers with each delivery. Product specification sheets are produced for each individual product. Products are sold within the UK only and conform to current legislation such as EC1935/2004, EC 2023/2006 and EU10/2011. Suppliers Declarations of Compliance also confirm the above. External migration testing is undertaken by suppliers on a regular basis. Migration report dated 16.11.16 viewed during the assessment from Taghleef Industries S.p.A. testing BOPP film which met the global migration limits laid down in the EU10/2011 Directive. There is a genuine electronic copy of issue 5 of the standard in place. The company has a system to ensure recertification occurs on or before the audit due date and this audit took place within the required timeframe in this instance. The Operations Director who has overall responsibility for the site was present at the opening and closing meeting and all relevant personnel were on site and available during the assessment. The root cause of the three three minor NC’s raised during the last audit has been effectively addressed to prevent re-occurrence. All N/C’s raised during audits must be formally closed out be designated personnel along with root cause documented as part of the investigation.</td>
</tr>
</tbody>
</table>

#### 1.2 | Management review |
|-----|-------------------------------------------------------|

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---|---|---|---|---|
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There is an annual Management Review Meeting undertaken at the site. The last meeting was conducted on the 16.12.16. Present at the meeting was the M.D., Operations Director, Quality Manager & Technical Engineer. The minutes were reviewed during the assessment and the agenda items were found to meet the requirements of the standard and included as examples:

- Previous minutes
- Review of the Product Safety & Quality Management System
- Performance and effectiveness of the Product Safety & Quality Management System
- Monitoring and measurement of results
- Audits
- Supplier review
- Resources
- Risk assessments
- Opportunities for improvement
- Outputs
- Nest meeting

Minutes are circulated to all attendees with action points allocated to designated personnel. The review process reviews targets and objectives and re-sets where necessary. Objectives are detailed in section 1.1 above. Site issues are resolved via the Control of Non-conforming Product procedure.

1.3 Organisational structure, responsibilities and management authority

There is a documented Organogram in place as part of Doc. Ref. SOP 16. The organogram defines the current structure and is dated 18.01.17. The chart is displayed as a tiered structure starting at the CEO and M.D. and ending at the Production Operatives. Key personnel are displayed along with clearly defined reporting channels. There is a dedicated BRC Management Representative on site in the form of Caroline Clay - Quality Manager and Scott McEvoy – Technical Engineer as the BRC Deputy. Job descriptions are in place and issued to all personnel upon commencement of employment, observed for the Quality Manager, Graphic Designer, Production Operatives & Warehouse & distribution Manager. It is documented within the system who deputises in the absence of the responsible person.

Non-applicable clauses

2. Hazard and risk management system

2.1 Hazard and risk management team

There is a multi-disciplinary H&RM Team in place at the site which has developed the system. The system is subject to continual management and review. The Team Leader is Scott McEvoy – Technical Engineer. The Team Leader has been formally trained in HACCP Principles to Level 3 by AFS Ltd on the 12.05.15. The Team leader has nearly 3 years’ experience in the food packaging industry. There are 4 active members of the H&RM Team and include Scott McEvoy – Technical Engineer, George Baker – Customer Champion, Jonathan Gardener – Machine Operator and Conner Secker – Warehouse Operative. All team members have been formally trained in HACCP principles and certificates are in place at the site. All team members have extensive experience of food packaging manufacturing operations. There is no external expertise used for the maintenance of the H&RM System.
2.2 Hazard and risk analysis

There is a comprehensive H&RM System in place. The system is currently at issue 1 – Revision 3, dated 01.09.16. The system comprises control point steps managed via various documented control measures in addition to established pre-requisite programs. The scope of the System is documented in the Terms of Reference page of the study and is defined as the scope of assessment and covers the entire production processes for flexible food packaging films from raw material source to the delivery of finished product to the Customer. The system is designed to meet agreed customer expectations, and satisfies statutory, regulatory and safety expectations. The company have considered the following guidelines and relevant legislation in the construction of the System: - EC No.1935/2004 Articles in food contact, EC No. 2023/2006 GMP, and EU 10/2011 and amendments along with codex alimentarius principles and the BRC Packaging Standard issue 5. The Product Description & Intended Use is defined as packaging film such as OPP & PET films for use with food and other applications, examples being dairy, food, chemical and pharmaceutical products. The company Declarations of Compliance, Product Specification Sheets and Supplier Certificates of Conformity substantiate compliance to the clause. Recycled material of any kind is not used. A process flow diagram is in place defining the operations undertaken on site. Process step examples include: -

- Receipt and approval of artwork
- Purchasing
- Goods in
- Slitting/perforation
- Printing/lamination
- Finished goods storage
- Despatch
- Customer returns

The flow chart has been verified during the last system review undertaken by the team 31.08.16. The company has considered and documented potential hazards and risks relating to the production of the packaging. Hazards are identified for each step of the manufacturing process on the Hazard Analysis Chart. Risk is assessed and scored via traditional 3 x 3 HACCP methodology taking into account likelihood and severity and given a rating of low, medium or high. High risks are deemed as being CCP’s. Hazards are controlled through existing pre-requisite programs of which there are 18 documented, ranging from Supplier Control to Waste Management. Typical hazards include but are not limited to: - Pests, delivery vehicles, wood, hairs, blood and dust. Hazards relating to the potential for unintended migration have not been considered as part of the Hazard Analysis. Minor NC1. There is a separate risk assessment in place to cover the potential for malicious intervention & this is dated 01.09.16. Control measure have been documented for the identified hazards and includes only purchasing materials from approved suppliers, Hygiene rules & glass and similar material controls as examples. The team have assessed the risk levels of all identified hazards associated with the production of the packaging and deemed no hazard worthy of CCP status as all identified hazards are suitably controlled via the existing 18 PRP’s. The Non-conforming Product procedure is instigated in the event of defective product being identified during the production process. The Hazard & Risk analysis review process takes place annually via a formal documented review meeting. The team review all aspects of study inclusive of risk assessments and documents the findings accordingly. The review was last conducted on the 31.08.16 with only very minor changes being made. If or when a significant change occurs the team are reconvened to re-evaluate the system in full.

2.3 Exemption of requirements based on risk analysis

There have been no exemptions requested based on risk.
Non-applicable clauses 2.2.8, 2.2.9 & 2.3.2

3. Product safety and quality management system

3.1 Product safety and quality management system

There is a well-established Product Safety & Quality Management System in place covering the ISO9001 & BRC Packaging Standard requirements. The site has produced a Quality Manual which is logical in its construction & comprehensively addresses the requirements of both standards. The system is committed to quality and hygiene practices and is maintained by the team as required. Individual Policies, Procedures & Work Instructions are in place that support the system. The effectiveness of the QMS is reviewed during the annual Management Review Meetings and opportunities for improvement are implemented as necessary. The manual is also reviewed when any changes to the company’s processes or procedures occur, including changes to the standard.

3.2 Documentation control

There is a procedure for controlling documentation in place as SOP18 at issue 4, dated Jan 2017. Document control protocol is title, reference number, issue number and date. Documents are controlled by document master lists and change control protocols. All changes to documents and records are recorded on the “Obsolete Register” along with the reason for the change. Site documentation is controlled and amended when applicable by the Quality Manager or Deputy apart from Policies which are passed to the M.D. or Operations Director for approval before re-issue. Electronic documents are protected on password protected systems which incorporate anti-virus controls. The computer system is site managed.

3.3 Record keeping

Record Keeping is defined in the "Records" procedure Doc. Ref. SOP15 at issue 2, dated Oct 2013. Hard copy records of quality inspections and approvals are held in bespoke job bags relevant to each order. Electronic records are backed up daily. Records are initialed or signed by the relevant Operator, Supervisor or Manager. All changes to documents and records are recorded on the “Obsolete Register” along with the reason for the change. The system is both computer & hard copy based. Records pertaining to product safety, legality, and integrity are maintained. The retention time for records relating to product safety, quality and legality is defined as 3 years. Examples of retained records are:

- PPM records
- Cleaning records
- Pest control records
- Purchase orders
- Q.C. checks
- Internal audits
- Supplier records

3.4 Specifications

Specifications were challenged and found to exist for all products manufactured at the site. Specifications also exist for all raw materials. Specifications were challenged for raw material and were observed for BOPP film supplied by Taghleef Industries S.p.A.. Specifications are suitably detailed and include composition,
applications. Associated legislative requirements are detailed on the suppliers accompanying D of C’s. 

Finished Product specification reviewed for Product Code LAN305ADCCMGRW printed laminated film for G R 
Wrights Ltd. All products are manufactured on site and sold within the EU & conform to current legislation 
such as EC1935/2004, EC2023/2006 and EU10/2011. Specifications are formally agreed between the 
Customer and the company after the specification and design process has been completed and the 
specification, design or artwork has been signed off. Order acknowledgements are sent to all customers for 
all orders prior to any production run taking place. The company ensures materials are safe for use with food 
and has Declarations of Compliance in place for all products produced at the site and are sent to Customers 
with each delivery. D of C’s are fully compliant with the standard and includes the materials used in the 
composition of products, legislative requirements/compliance, the inclusion of recycled content, in this 
instance 0% and also defines limitations of use. Reviewed during the assessment for Product Code 
LAN305ADCCMGRW printed laminated film for G R Wrights Ltd dated 10.01.17 and signed by the Quality 
Manager. Trademarks are used and agreed formally between both parties at the design stage, prior to any 
production runs, as and when applicable. There is a specification review process in place. The order 
processing procedure entails conducting a specification review on each order by the Sales & Technical 
Engineer. All changes or amendments to existing specifications are reviewed by Sales, Production & 
Technical Depts. for consideration and possible implications.

3.5 Internal audits

There are formal procedures in place for internal auditing of site operations. There is an Internal Audit 
procedure in place as part of the QMS. The procedure is SOP12 at issue 3, dated Jan 2017. The Internal Audit 
procedure is substantiated by an Internal Audit Schedule SOP-D12-1 that ensures all activities associated 
with the standard are subject to internal audits at least annually. Internal Audits are undertaken by Caroline 
Clay – Quality Manager and Scott McEvoy – Technical Engineer who have both been trained to lead Assessor 
with training records retained on site. Certificate observed for Scott McEvoy trained by Bywater Excel on the 
18th 22nd Jan 2016 Cert. ref. 3634. Internal audits ensure impartiality with auditors not auditing their own 
work. Internal audits sampled during the assessment as follows: -

- Organisational Control – Undertaken by Caroline Clay on 20.06.16. Documented evidence of 
  conformity was in evident in the audit report and 1 N/C’s was raised and closed out within the 
  required timeframe.
- Order Purchasing and Contract Review – Undertaken by Caroline Clay on 04.07.16. Documented 
  evidence of conformity was in evident in the audit report and no N/C’s were raised.
- Internal Audits – Undertaken by Scott McEvoy on the 20.12.16. Documented evidence of 
  conformity was in evident in the audit report and 1 N/C and 2 observations were raised and closed 
  out within the required timeframe.

N/C’s are recorded on the Corrective Action Report with root cause analysis completed as part of the 
investigation. N/C’s are required to be completed within 28 days. The completion of corrective action is 
signed off on Corrective Action Report by the auditor.

3.6 Supplier approval and performance monitoring

The company has a supplier approval and monitoring system in place detailed in SOP14 at issue 5, dated 
10.10.14. All new suppliers are subject to a site inspection by a Company Director in the first instance. 
Suppliers are also sent the “Packaging Assessment Supplier Questionnaire” which requests information 
regarding the company’s Management Information System, any certifications the company hold & 
information pertaining to the company’s performance history to supply relevant goods or services.
Certification to a recognised Quality Standard such as ISO9001:2008 or BRC Packaging is a pre-requisite to supply Food Contact materials. Suppliers are subject to a probationary period and once fully approved added to the Approved Suppliers List are then subject to continual on-going performance review procedures by Purchasing and Technical personnel.

Suppliers reviewed during the assessment:

- Accrued Plastic Ltd – Film Supplier certified to BRC Packaging by NSF Knight, Cert Ref 9270 valid until 10.07.17. Questionnaire in place and completed dated 26.01.17.
- UAB Lietpak – Film Supplier certified to BRC Packaging by B.V. valid until 05.03.17. Questionnaire in place and completed dated 20.12.13.

There is an approved Supplier list in place. Suppliers are not used that are not on the approved suppliers list, but if an exception needed to be made, trial orders, C of A’s or D of C’s would be requested prior to using any material.

3.7 Management of subcontracted processes

Sub-contractors have been employed to print and laminate films to the company’s specifications, they are all BRC and/or ISO 9001 certificated. Sub-contractors are subject to the same controls as all other suppliers and Customers are aware of sub-contracted operations undertaken by the company.

3.8 Management of suppliers of services

The company use several suppliers of services e.g. pest control & transport. The approval of these suppliers is covered by SOP14 at issue 5, dated 10.10.14. Service specifications for suppliers of services to site are in place. Reviewed for the following:

Premier Pest control Services, ADD Express Ltd & Berendsen

3.9 Traceability

The company has traceability procedures in place to identify items through all stages of the manufacturing process. Reels of plain, or printed film and laminates are delivered by suppliers and are identified by Batch Numbers, Reel I.D. Nos. Supplier Name and Country of Origin. All reels are recorded on an electronically generated GRN and allocated a Batch No. which forms the basis of traceability throughout the production process. Operators attach I.D. labels detailing Batch No. and Roll I.D. No. to every reel before wrapping and despatching. Materials are traceable via electronic and hard copy records. The Customer can identify the product from the reel label, pallet label and the delivery note. This information can be traced back to the original material used in the production of the product. Labels detail information such as Batch No., Product Description, PO No., Customer Name, Reel No. and Reel Weight. The traceability system is subject to continual testing as Customers ask for documented traceability tests on a regular basis. Reviewed during the assessment as follows:

The system was tested successfully from finished goods to raw material on 15.11.16 for Job No 1608040001 Product Code LAM120ABM Printed Laminated Film 120mm delivered to Pulsin Ltd on the 03.10.16 on Del Note number 1609260003. The Customer Purchase Order was 1515. The reels were printed on National Flexibles Print Order 4009115 on the 03.10.16 by Mercury Packaging Ltd and delivered into site on the...
### 3.10 Customer focus and contract review

Customer Focus & Contract Review is defined as Doc. Ref. SOP5 at issue 2, dated Jan 2016. The Sales & Marketing Director and Sales Co-ordinators are responsible for sales, contract review, order processing and Customer satisfaction. There is an ongoing review of customer requirements through monthly Sales meetings and daily Production Meetings. Satisfaction is gauged through complaints, annual Customer surveys and the on-going retention of business. All N/C’s and complaints are recorded and acted upon immediately. Products are produced to order and Designs/specifications generated on the bespoke “Redcliff” MIS. Order processing inclusive of a complete end to end traceability challenge was reviewed during the assessment for Product Code LAM305ADCCMGRW Printed Laminated Film on the Reel for G R Wrights Ltd delivered on 10.01.16 on delivery note number 1701120018. The order was delivered by ADD Transport with vehicle hygiene checks recorded on the site Consignment Manifest by Steve Mellor – Warehouse Operative. The order was for 18,448 impressions. The Customer ordered the film on the 09.01.17 against PO Ref. 62950. The artwork for this repeat order was originally supplied via email by the Customer and approved to print on the 15.08.16. The order was manufactured by TCL Packaging during Aug 2016 against National Flexible Ltd PO No. 4009134. The printed film was received into site 09.09.16 from TCL Packaging Ltd with goods in checks completed by the Warehouse Team. All issues or comments from Customers are recorded and discussed at the Management Review meetings as well as the daily and monthly schedule of internal meetings.

### 3.11 Complaint handling

Customer Complaints follow SOP13 at issue 5, dated Sep 2016. Complaints come into the business via email, phone or face to face contact. All Customer complaints are logged onto the bespoke "Customer Complaint Database" which is linked to the "Redcliffe" MIS. Complaints are recorded and investigated by the Technical Director in the first instance. The complaint is then allocated to the relevant department for investigation which includes documented root cause analysis. Corrective action is proposed and agreed and the Customer is informed in writing of the results of the investigation and the time scale for completion. Complaints are trended and discussed at the weekly Board meetings and annual Management Review Meetings. Complaints are currently running within the set target with 196 being raised in 2016.

Complaints reviewed during the assessment were all observed to have been thoroughly investigated and closed out to the Customers satisfaction. Specifically reviewed for complaint nos.: -

- D8036
- D8029
- D8024

### 3.12 Management of product withdrawals, and incidents and product recalls

Product Withdrawals, Recall & Incident Management are defined in three separate procedures as follows: -

- SOP21 Crisis & Incident Management at issue 1, dated 26.01.16
- SOP22 Product Recall at issue 1, dated 26.01.16
- SOP23 Product Withdrawal at issue 1, dated 26.01.16

The procedures are comprehensive and fully compliant with the requirements of the standard. The
procedures list the type of event that would constitute an incident e.g. allergenic contamination, flood, fire, or chemical leaks. Investigations pending a decision to withdraw a product incorporate root cause analysis, corrective action & preventative action. The incident management team is defined as the Operations Director, Quality Manager and Transport Manager. All incidents are recorded and acted upon immediately. The procedure is capable of being put into operation at any time. The Operations Director in collaboration with the Customer is ultimately responsible for withdrawal decisions. Contact lists for Customers are in place. Customer and regulatory body communications are the remit of the Quality Manager. The product withdrawal procedure is regularly tested where defective stock is collected from a Customer due to a compliant. Reviewed for compliant number D7994 where stock had to be collected from a Customers premises due to damaged cores on the 29.11.16. The site has not had to assist in any Customer instigated Product Recalls during the last 12 months.

Non-applicable clauses

4. Site Standards

4.1 External standards

All external areas were reviewed during the assessment. The site comprises one large unit for warehousing and manufacturing operations. The site is located on an industrial estate in Birkenshaw on the outskirts of Bradford with no neighbouring activities posing any risk of contamination to the product. The perimeter, grounds and building fabric were found to be maintained to a high standard. There is a yard area at the rear of the site for the loading and unloading of vehicles. There are designated areas within the yard given over to waste streams with several waste skips in evidence, all clearly marked. External traffic routes are suitably surfaced and natural drainage was observed to be adequate. All external drains are trapped. Raw materials are not stored externally.

4.2 Building fabric and interiors

All walls, floors and ceilings were observed to be maintained to a high standard. There are painted designated walkways in production and storage areas that are well maintained with no flaking or chipped paint in evidence. Lighting, including EFK tubes, in production & storage areas was observed to be adequate and is subject to shatterproof and/or protected tubing. Windows in production do not pose a risk of contamination. Suitable ventilation is in place and is of natural provision.

4.3 Utilities

Water is of potable quality, it is not used in the process but utilised for cleaning purposes; it is via mains supplies provided by Yorkshire Water. Compressed air used on site is filtered, oil separated and dried. There is 1 compressor on site, all of which are serviced to a schedule by an external contractor M.J. Howard and service records are retained on site. Compressed air does not come into direct contact with any products.

4.4 Security

Site security arrangements have been fully risk assessed and the assessment id dated 01.09.16. The risk assessment is inclusive of potential risk from malicious intervention and has not identified any high risks as site security procedures are robust and working well. There is one secure key fob entry point for employees. The site has full CCTV and is alarmed out of hours. A fire exit was observed to be left open during the site
tour. **Minor NC3.** All visitors and contractors must report to reception and follow the signing in procedures. All visitors and contractors are supervised whilst on site. Staff are trained to challenge unauthorised personnel.

### 4.5 Layout and product flow

There is a plan of the site in place which shows all access points for personnel, people flow & product flow, staff facilities and storage areas. There is an appropriate laid out, production linear flow system in operation. There is Quality Control line clearance procedures in place on changeovers. Segregation in production consists via departmental layout, for example raw materials, manufacturing halls of slitting/rewinding, & finished goods.

### 4.6 Equipment

The equipment is designed specifically for its intended purpose and much of the equipment is relatively new. The machinery is being maintained to a high standard. Equipment on site comprises slitter/rewinders which function as the primary production operation some of which have perforation capability. Printing and laminating are outsourced sub-contracted operations. No unsealed wooden equipment was noted in production or storage areas. Notices on equipment were observed to be cleanable and secure during the site tour.

### 4.7 Maintenance

Equipment, including new machinery on site, is subject to condition based maintenance by the machine manufacturer or local contracted engineer. The system is paper based and records of completed jobs are kept on site. Maintenance is split down by individual machine. Following any condition based maintenance, the contactor will thoroughly check the machine before handing back to production and must sign the “Clearance After Maintenance Work” form Doc. Ref. D004.7 at issue 1, dated 27.01.16. Temporary modifications are extremely rare but if they are essential they are recorded on the Temporary Engineering Sheet and are subject to a timed permanent solution. Food grade greases and lubricants are used e.g. Foodlube WD Spray and Foodlube Spray Grease. There is no workshop on site.

### 4.8 Housekeeping and cleaning

Housekeeping systems are in place at the site. Production staff are responsible for cleaning their own areas and there is also a dedicated contracted cleaner responsible for staff welfare areas, Active Cleaning Company Ltd. There are daily cleaning schedules in place in the form of “daily Inspection Pads” completed by operators. The schedules are compliant with the requirements of the standard and are subject to verification by Supervisors or Managers. Cleaning schedules were observed to be complete and up to date at the time of the assessment. There is a designated secure storage cupboard for cleaning equipment and materials located in the cleaning room in the warehouse. Toilet cleaning equipment is segregated and no strongly scented chemicals were notes during the assessment.

### 4.9 Product contamination control

#### 4.9.1 Glass, brittle plastics, ceramics and similar materials control

Controls to minimise foreign body contamination are in place across all areas of the site and were observed to be effective during the assessment. No unnecessary glass, brittle, plastic or other similar materials were noted during the assessment. Light tubes are shatterproof and/or protected in production and storage areas.
areas. Glass and brittle plastic is monitored through a documented glass audit undertaken by designated personnel (typically the Quality Manager) every month. The glass audit was last completed on the 06.01.17 and all items documented on the register were in working order with no issues. Items on the register are cleaned in accordance with the housekeeping and cleaning procedures. There is a glass breakage procedure in place as Doc. Ref. SOP30 at issue 1, dated 01.02.16 with all incidents being recorded on an Incident Report.

4.9.2 Sharps control

Sharps control is defined in Doc. Ref. SOP25 at issue 1, dated 01.02.16. Snap off blades are not used. Stanley type knives only and issued to each Operator and recorded on the Knife Register which is checks regularly by the shift Supervisors. There are registers in place for hand knives/blades and slitter/rewinder blades and are administered by the Shift Supervisors. Registers were up to date at the time of the assessment. Used blades are disposed of in dedicated sharps containers.

4.9.3 Chemical and biological control

There is a formal control system in place for chemicals. The Quality Manager maintains a list of approved chemicals and MSDS’s are maintained on site. Observed for Foodlube WD Spray supplied by Rocol. The company have assessed the controls in place using the hazard analysis system. These controls have been designed to prevent chemical contamination where appropriate. Cleaning chemicals were observed to be controlled, all seen to be labelled, closed/capped with manufacturers’ instructions and stored away from production in secure designated locations at the time of the assessment.

4.10 Waste and waste disposal

Waste is well managed on site in accordance with legislative requirements and split into multiple waste streams, examples being general waste, cardboard waste and plastic waste. The Operations Director maintains the on-site Waste Management system to a high standard. There is a register in place detailing all Waste Contractors. Contractor information example – Biffa who remove all general waste from site. Arrangements are in place for the secure destruction of trademarked waste should the need arise. Waste containers are in place and are clearly marked across the site. There is 1 compactor on site that feeds the general waste stream.

4.11 Pest control

There is a Service Agreement in place with Premier Pest Control covering rodents and insects, both internal and external baits are used along with EFK’s. Premier Pest Control is a member of the BPCA Certificate Number is M15/683 valid until 28.02.17. There are 8 routine visits, 4 Field Biologist visits and 4 EFK inspections each year including catch analysis & tube changes where applicable. From a review of the data, the activity on site is very low and of no cause for concern. Last routine visit took place on the 11.01.17 and no rodent activity was recorded. The visit included a service of the EFK’s & a catch analysis which recorded acceptable counts in all units. The last Field Biologist inspection took place on 06.02.17 and no issues were raised requiring action. Training records are in place for Chris Cunningham, Gavin Cooper and John Amys who all hold relevant training certificates. A register of pesticides along with data sheets is present in the file e.g. Neosorexa Wax Blocks (Difenacoum). There is a site plan in place displaying all pest control devices. The pest control site plan has signed and dated on the 11.01.17. There are 13 external bait points, 23 internal bait points and 5 EFK’s displayed on the plan. Employees are trained to recognise the signs of pest activity and must report any instances immediately to a Supervisor or Manager.
5. **Product and process control**

### 5.1 Product development

There are two main documented procedures that cover the company’s design and development operations. These are SOP1 "Print Design & Quotation" at issue 3, dated Jan 2016 and SOP 2 "Print Order - New Design" at issue 2, dated Jan 2016. Product design is realised through communication between the Customer and the company’s Technical and Sales functions. Technical specification sheets are created on site based on Customer requirements and validated by Technical, Production & Quality personnel. The Company does not design and develop products in the true sense, it mainly advises Customers on appropriate films and laminates where necessary and then receives and processes supplied print ready artwork to the pre-agreed Customer specification. Production trials are undertaken where appropriate but this is a rare occurrence. No products contain any recycled materials. All products produced are safe and legal and samples are retained in accordance with Customers requirements.

### 5.2 Graphic design and artwork control

Graphic design & artwork control is defined in Doc. Ref. SOP2 at issue 2, dated Jan 2016 and includes managing changes to artwork following amends. Artwork file are provided by the Customer via email or FTP link, in house systems then check artwork with a final approval from the Customer being required before the job is sent to the designated printer for production. All new jobs are given a unique reference number. The above process was challenged and reviewed during the assessment for Product Code LAM305ADCCMGRW Printed Laminated Film on the Reel for G R Wrights Ltd delivered on 10.01.16 with the artwork for this repeat order approved to print by the Customer on the 15.08.16. Artwork files are held on the server and are protected from malicious intervention.

### 5.3 Packaging print control

Not undertaken on site but as an outsourced sub-contracted operation via dedicated approved printing company's all of which hold current BRC Packaging certification.

### 5.4 Process control

The company has procedures in place to ensure effective control of all operations relating to critical product defects. SOP10 at issue4, dated 19.01.16 covers Process Control. It was observed that the operations on site were controlled through effective Process procedures, Quality Assurance procedures and Works Instructions to continually achieve correct manufacture of safe and legal products. Senior members of the Technical, Sales, Production and Quality Depts. continually review on site processes to ensure consistency of product is maintained. Established controls are in place to ensure product integrity with corresponding manufacturing work instructions and a comprehensive control of non-conforming product procedure. Controls such as the hygiene code of practice and daily cleaning regimes maintain standards of hygiene. Production specifications and machine settings are available for all products and include process limits and tolerances. Specifications are approved internally by Technical & Production personnel before a quotation is raised to the customer. Procedures, works instructions and prerequisites programmes are in place to ensure production of safe and legal products that meet customer requirements. There are two processes in operation on site, these being slitting/rewinding and hot needle perforation. Examples of typical machine settings would include speeds...
and tensions. The Production Works Order defines the specification and process set up of the run & also contains the bill of materials. Production is planned by the Shift Supervisor and production sheets are passed to Operators who set up the machinery. There is a first off inspection regime in place. All first off sheets must be signed off by the Shift Supervisor. Following first off sheet sign off, there are in-process inspections by operatives defined through works instructions and recorded to pre-determined frequencies on the Production Record Sheets. Viewed completed inspection results for the Works Orders in production during the assessment. Currently documented equipment process checks are currently not being undertaken to ensure the correct length on slit reels is being achieved. **Minor NC4.** Before every run of a new job, the machine is set up for the new parameters to ensure the machine is correct for the product specification; this is recorded on the Production Record Sheet. New specifications are raised after an approval process with the customer. The quality procedures are then re-validated to ensure conformity to specification and are verified via in-process inspection regimes.

5.5 Calibration and control of measuring devices

There are several pieces of equipment calibrated on site in accordance with procedure SOP8 at issue 3, dated March 2016. There is a calibration file held at site with a full list of equipment along with associated serial numbers. There are 9 sets of scales externally calibrated under contract by D. Brash and Sons Ltd who use equipment traceable to National Standards. The scales are calibrated at the same time, the last time being on the 25.10.15. There is also 1 micrometer for gauge checking on site. Calibrated on the 27.01.17 by SCS Ltd under cert. ref. 294062. Equipment failure would instigate the site non-conformance procedure which incorporates root cause analysis and corrective action.

5.6 Product inspection, testing and measuring

Quality checks are undertaken by operators at start-up and during the production run on every reel and are recorded on the Production Record Sheet. Checks include weight, treatment check, slit check, appearance and material. All pallets delivered to the finished goods warehouse carry a Q.C. Pass off sticker which has been signed by the relevant Operative. Checks were observed completed for the jobs in production during the assessment. The company has used hazard analysis principles to assess the need for in-line testing and measuring equipment and deemed off line quality checks substantial enough to guarantee the quality, safety and legality of all products produced at the site. External migration testing is undertaken by suppliers on a regular basis. Migration report dated 16.11.16 viewed during the assessment from Taghleef Industries S.p.A. testing BOPP film which met the global migration limits laid down in the EU10/2011 Directive.

5.7 Control of non-conforming product

There is a “Non-conforming Product” procedure in place defined in SOP13 at issue 5, dated Sept 2016. Any out of specification product identified during the manufacturing process is labelled and quarantined. N/C’s are recorded on the site Non-Conformance Form. All N/C material is subject to inspection and investigation using root cause analysis. Corrective action and preventative action taken is documented on the form. The last documented instance of non-conformance occurred on the 26.01.17 as Ref. No. 1012 for damaged film delivered by a supplier and was still under investigation at the time of the assessment.

5.8 Incoming goods

Incoming goods requirements are defined in Doc. Ref. SOP11 Materials Handling at issue 3, dated Jan 2016. All incoming goods are visually checked by Warehouse Operatives for taint, odour, contamination & damage. The vehicle is also checked for overall hygiene and if acceptable the delivery note is signed and the material is unloaded, scanned and put to stock & used in conjunction with FIFO principles or as directed by the
5.9 Storage of all materials and intermediate and finished products

All raw materials and finished goods are suitably identified with labels & wrapped to avoid contamination where necessary and stored in controlled environments. During the assessment it was observed that raw materials and finished product were kept segregated. There are no hazardous chemicals on site.

5.10 Dispatch and transport

All finished goods are checked along with the vehicle before loading and must be signed off before the vehicle leaves the site in accordance with SOP11 Materials Handling at issue 3, dated Jan 2016. Goods out checks were reviewed during the assessment for a delivery of Product Code LAM035ADCCMGRW Printed Laminated Film on the Reel for G R Wrights Ltd delivered on 10.01.16 on delivery note number 1701120018. The order was delivered by ADD Transport with vehicle hygiene checks recorded on the site Consignment Manifest by Steve Mellor – Warehouse Operative. Any damaged pallets that arrive from suppliers are brought to the attention of the Despatch Manager and appropriate actions taken. Signed service specifications are in place with numerous transport organisations, examples being ADD Transport, Pink Link & Freight Team. Delivery drivers are supervised whilst on site and must abide by the company hygiene rules. There are no company owned transport vehicles.

Non-applicable clauses 5.2.4, 5.3, 5.6.3, 5.6.6 & 5.10.3

6. Personnel

6.1 Training and competence

Training and competence is covered by SOP7 at issue 3, dated Jan 2016. The site ensures that all staff are trained for their role within the company and staff interviewed during the course of the evaluation were competent, fully trained and showed commitment to the processes they were involved in. All new employees are subject to an induction program & are issued with a Company Handbook prior to starting their employment. The induction program comprises as examples: - Employee Handbook, H&S, Fire Safety, Absence, PPE and Hygiene Rules. Induction records were reviewed during the assessment for Bernard Conboy – Production Operative, completed on 30.01.17. There is a training matrix in place defining the competencies of site personnel, maintained by the Quality Manager. Training is implemented on an on-going basis and further training is identified and implemented as necessary. Staff are subject to annual appraisals by their direct report. Training records for all personnel are kept for the life of the employee and also indefinitely if the employee leaves the company. Training records were challenged and observed completed and signed off as follows: -

- Dave Harland – Production Operative, trained in operating the slitting & rewinding by Craig Robinson – Shift Supervisor on the 28.09.15.
- Andrew Conboy – Production Operative, trained in operating the slitting & rewinding by Craig Robinson – Shift Supervisor on the 28.09.15.
- Conner Secketr – Warehouse Operative, trained in operating the Dock Leveller by Boluaji Fagboran – Warehouse Supervisor on the 10.10.16.
Training records define the course taken, name and role of employee, and the trainer. Records are signed off by both trainee and trainer.

### 6.2 Personal hygiene

The company has documented its jewellery policy as part of the Hygiene Policy 7 Procedure dated 16.01.17 and only allows 1 plain wedding band & 1 pair of sleeper or continuous loop earrings to be worn in production and storage areas. There are no personal items, including mobile phones, allowed in the production areas. Personal items must be kept in lockers. Perfume & aftershave is not permitted to be worn. Personal medicines are not permitted outside of the welfare areas. All personnel, visitors and contractors, working in production areas, are required to wash their hands upon entry, after using the toilet and after eating, smoking or drinking. Cuts & grazes are covered by a blue plaster issued by First Aid personnel.

### 6.3 Staff facilities

Access to locker rooms is situated prior to entry into production. Visitors and contractor facilities are available at various locations around the site. Suitable lockers are provided for each employee that enables segregation of personal items and workwear. No evidence was found at the assessment of eating, drinking or smoking in locker rooms. Suitably maintained and controlled hand washing facilities were seen to be in place at the site and includes the provision of warm water, unscented soap and suitable hand dryers. Hand-washing advisory signs are displayed at point of use. Hand wash stations are located at the entrance into the production area and in all staff toilets. Toilet facilities at the site were found to be in a clean and hygienic condition at the time of the assessment and do not open directly onto production or production areas. There is a canteen provided at the site which was observed to be kept to a high standard with the provision of food storage facilities. No eating or drinking is allowed in production or storage areas.

### 6.4 Medical screening

Staff are trained in what symptoms would prevent them from working. If any staff member is feeling unwell they must report immediately to their Line Manager. Staff are sent home and upon return to work must follow company Return to Work protocols. All visitors and contractors are required to complete a health questionnaire upon on entry to the site.

### 6.5 Protective clothing

Employees are provided with suitable sets of company clothing. Clothing includes T-Shirts, sweatshirts, boots, high viz coats & vests, trousers, gloves and hairnets. Beard snoods are provided as necessary. Company clothing is laundered under contract by Berensen. Company clothing is inspected for compliance by Line Managers. Clean and dirty clothing was observed to be kept adequately segregated during the assessment. Disposable protective clothing is used by visitors and discarded after one use.

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<th>Non-applicable clauses</th>
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If you would like to feedback comments on the BRC Global Standard or the audit process directly to BRC, contact enquiries@brcglobalstandards.com or call the TELL BRC hotline +44 (0)20 7717 5959.
### 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**