Audit Report

Global Standard Packaging and Packaging Materials Issue 5: July 2015

Audit summary			
Company name	Propac Thermoforming Ltd	BRC site code	1626545
Site name	Hyde		
Hygiene Category	High Hygiene		

Audit scope	
Scope of audit	The design and manufacture of thermoformed packaging from the intake of raw materials to the dispatch of finished plastic trays for food and non-food packaging.
Exclusions from scope	None.
Justification for exclusion	N/A

Voluntary modules included		
Modules	Result	Details
Choose a module	Choose an item	
Choose a module	Choose an item	

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

Number of non-conformities		
	Major against SOI of Fundamental	0
	Critical	0
	Major	0
	Minor	3

Company details

Address	Units 1 - 4 Fromac Works Junction Street Dukinfield Hyde SK14 4QN		
Country	United Kingdom	Telephone	0161 343 5220
Commercial representative Name	Caroline Gillies	Email	caroline@propacthermoforming.co.uk
Technical representative Name	Caroline Gillies	Email	caroline@propacthermoforming.co.uk

Company profile

Plant size (square metres)	<10K sq.m	No. of employees	1-50	No. of key processes	1-3
Subcontracted processes		No			
Other certificates held		None			
Regions exported to		Europe			
Major changes or auditor observations since last BRC audit		New Kiefel KMD78 thermoforming machine commissioned and now in operation. Investment made in the production of a new tomato punnet tray tooling.			
Company description		Propac Thermoforming Limited is privately owned and operated by Mrs Caroline Gillies. The Company was established in 1992 and has been at its present Site for 16 years. The Company employs a total of 14 staff in a 1500 sq m facility. The Shift/Working Pattern is 6am to 4pm and 8am to 8pm. The Company operates 1 H&RM system. The Company thermoforms food and non-food containers by way of three thermoforming devices, ILLIG's RV and RD 53 and a Kiefel KMD 60. A new thermoformer has also been installed. Areas visited included 2 Production Units, Warehouse and all ancillary areas. The Company continues to increase turnover with a continual focus on maintaining and developing existing Customers. The company also uses a small warehousing facility located within 0.5 miles for the storage of raw materials and process scrap for recycling.			

Product and process characteristics

Field of Audit (Glass Paper Metal Rigid plastic Flexible plastic Wood and other material Print Chemical processes)	04 - Rigid plastics
Products in production at the time of the audit	9018 Clear Styrolux Tray; 9075 140g RPET Black Tray; 9058 120g Snack Pot

Audit duration details

Finish date	2017-05-09		
Re-audit due date	2018-04-24	Previous audit date	2016-04-20
On-site duration	12 hours	Duration of production facility inspection	2 hours
Reasons for deviation from typical or expected audit duration	No deviation in line with contract		
Next audit type selected	Announced		

Audit duration per day

Audit days	Date	Audit start time	Audit finish time
1 (start date)	2017-05-08	09:00	17:00
2	2017-05-09	08:00	12:00

Auditor information

Auditor number	Auditor Name	Role
205039	Gary Whatmore	Lead Auditor

Present at audit				
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings (ref: clause 1.1.7) Name / Job Title	Opening meeting	Site inspection	Procedure review	Closing meeting
Caroline Gillies, Director	X		X	X
Gary Dollard, Operations Manager	X	X	X	X
Janet Dollard, Administrator	X		X	X

Non-Conformity Summary

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

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

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

Minor							
No.	**Clause**	**Details of non-conformity**	**Correction**	**Proposed preventive action plan (based on root cause analysis)**	**Evidence provided document, photograph, visit/other**	**Date reviewed**	**Reviewed by**
1	3.2.1	The Document Master List contains insufficient detail for the amendments made to documents	The Master Document List 'reason for change' column has been updated showing reasons why CP and Apps have been updated. Mostly improvements to the system.	Since the implementation of the Standard, the Company's Master Document List's 'reason for change' has always stated 'Update' because a change had been made, no thought was given to recording the reason. This has never been	Document	2017-05-31	G. Whatmore

				picked up at audit either BRC or third party. It makes sense to record the reason and this is now how the MDL is controlled.			
2	3.12.8	Timings for key activities have not been recorded as part of the site's Annual Product Recall System test.	The Non- conformance report for the Product recall was completed and signed off 15.05.17 by Caroline Gillies.	The Product recall report had not been closed off by Gary Dollard Ops Manager who had been handling the issue. This was due to outside issues involving the death of the Managing Director of the company in the following weeks. However the company's Control Procedure for Product Recall (CP10) did not actually state a close off period for findings to be dealt with. This should be 28 days. The CP has been updated. Date of Issue: 15.05.17 Issue No. 2.	Document	2017-05-31	G. Whatmore
3	4.8.2	Machine cleaning records have not been fully documented as part of the schedule.	New weekly cleaning records have been created for the thermoforming machines Appendices 8A and 8C.	Although a weekly cleaning checklist already existed for cleaning in all areas and each production unit there were no individual cleaning records for each individual thermoformer. The company operates a 'Clean as you go' Policy and this was deemed enough seeing as the company has a reputation for neat, clean and tidy machines which fetch an excellent second hand value. The House Keeping Procedure has been updated to include the new Appendices 8A and 8C	Document	2017-05-31	G. Whatmore

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
None

Voluntary Modules Non-Conformity Summary Sheet

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

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

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

Detailed Section

1.	Senior management commitment
1.1	Senior management commitment and continual improvement

System Validated: 08 & 09 May 2017
The company has established a Product Safety and Quality Management Policy which includes a safe and legal statement. The policy is reviewed annually at the Management Review Meeting and is communicated to all staff through company noticeboards at numerous locations around the site and via the induction program. The policy commits to a program of continuous improvement using targets and objectives. The Senior Management team at the site have demonstrated commitment to the implementation of the standard relevant to the manufacture of thermoformed products for food and non-food products. There is a dedicated BRC Team in place at the site which is supported by Senior Management. There are training programs in place to maintain and develop continuous improvement principles. The company have Quality resources in place and sets yearly Quality Objectives. Targets are reviewed at the annual Management Review meeting and adjusted as necessary.
There is dedicated BRC Resource provision on site in the form of Caroline Gillies – Company Secretary, Gary Dollard – Operations Manager and Janet Dollard – Administrator as BRC deputy. The BRC team are supported by the Production and Admin personnel. It was apparent during the assessment that adequate financial and human resource was in place to effectively maintain the requirements of the standard. The site has continued to invest heavily in both people and equipment since the last assessment. The Quality Policy is communicated to all personnel at factory entrances and displayed on wall areas.
The Company Secretary is responsible for keeping the company informed of all relevant legislation. The company consults with its suppliers and also researches various web sites such as fsa.com foodcontactmaterials.com. The BRC website is also consulted on a regular basis. The company subscribes to various trade magazines such as Packaging News and Plastics and Rubber Weekly. Information is cascaded down from this central source as and when required. The site has also become a member of BRC Participate.

Challenged at this Audit: 2017-GMW
The Product Safety & Quality Management Policy is currently at issue 1 dated 09/11/2015 and signed by the Managing Director.
Examples of current product safety, legality and quality objectives for 2017 are as follows: -

Customer complaints to be zero
Internal N/C's to be less than 5: 3 received in 2016
OTIF to be 100%
Maintain thermoforming machine speed cycles at over 45 cycles per minute.

The company ensures materials are safe for use with food and has a generic Declaration of Compliance in place, which is available for all Customers on request. Migration testing is undertaken by suppliers as and when required.
2 nonconformities were raised at the previous audit (against issue 4 of the standard), all of which were effectively closed out with no repetition present during the current audit.
There is an electronic copy of issue 5 of the standard in place. The company has a system to ensure re-certification occurs on or before the audit due date. The audit took place within the required timeframe in this instance. The Managing Director who has overall responsibility for the site was present at the opening and closing meeting and all relevant personnel were available during the assessment. Root cause is considered for nonconformities raised during internal and external audits and this is documented.

1.2	Management review

System Validated: 08 & 09 May 2017

There is an annual Management Review Meeting undertaken at the site.

Challenged at this Audit: 2017-GMW
The last annual Management Review meeting was conducted on the 04/04/2017. Present at the meeting was the Company Secretary and the Operations Manager. The minutes were reviewed during the assessment and the agenda items were found to meet the requirements of the standard. Minutes are circulated to all attendees with action points allocated to designated personnel when raised. 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. A second party audit was carried out by customer, Blue Earth Foods with a Green score awarded. Review of HARM system on 04/04/2017 to cover Glass & Brittle Plastics for the new Kiefel KMD78 Thermoforming. Actions, timeframes and performance against the standard are included as part of the Management Review.

1.3	Organisational structure, responsibilities and management authority

System Validated: 08 & 09 May 2017
There is a documented Organogram in place as part of the QMS along with documented Job Descriptions for all employees. It is clearly documented in the QMS who deputises in the absence of key personnel on site including the Management Representative.

Challenged at this Audit: 2017-GMW
The Organisational Chart is currently at issue 3, dated 11/04/2016. The organogram is displayed as a tiered structure starting at the Managing Director and ending at the Production Operatives. The Managing Director has responsibility for the site. Department Heads such as the Operations Manager and Engineering Manager report directly to the Managing Manager.
The Competent Manager/Director is Caroline Gillies, Company Secretary. The Deputy Manager is Janet Dollard, Administrator.
Job descriptions are in place for all key personnel and were reviewed for the Operations Manager, and Company Secretary, Administration Manager and Engineering Manager.
Absence cover for key staff is documented as part of the QMS under section 1.3 dated 11/04/2017. The Managing Director/Operations Manager/Administration Manager covers for the Company Secretary during absence. The Managing Director or Operations Manager will cover during absence for the Operations Manager.
The site maintains a documented list of Works Instructions on a Master List issued 12/04/2017.
CP18 Product Inspection Issue 2, dated 31/03/2017
CP9 Customer Order Process Issue 1, dated 02/12/2015.

Non-applicable clauses	

2. Hazard and risk management system

2.1	Hazard and risk management team

System Validated: 08 & 09 April 2017
There is a multidisciplinary H&RM Team in place at the site.

Challenged at this Audit: 2017-GMW
There is a multidisciplinary H&RM Team in place at the site with Caroline Gillies – Company Secretary as H&RM Team Leader. The Team Leader has extensive industry experience and has been trained in HACCP Principles by REM Associates on 27/02/2012.

The multi-disciplinary H&RM team are all time served industry professionals who all bring a range of skills to the process. The team also includes the Operations Manager who has been internally trained by the Team Leader.

2.2	Hazard and risk analysis

System Validated: 08 & 09 May 2017
There is a documented Hazard and Risk Management System in place at the site at issue 1, dated 10.12.15. The study covers all site operations and is supported by a Process Flow Diagram and a detailed Hazard Analysis. Potential hazards have been identified along with established hazard controls.

Challenged at this Audit: 2017-GMW
The scope of the analysis is the scope of assessment and covers the design and manufacture of thermoformed products for the food and non-food applications 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 Hazard Analysis is in accordance with the requirements of the BRC standard. The team are well versed in potential industry hazards. The site analysis covers potential hazards and contamination sources within the process inclusive of allergens, taint and odour, & component transfer. The study is inclusive of risk assessments with a foundation of prerequisites supplemented with identified hazards controlled via quality procedures, SOP's & work instructions. The prerequisites and QMS work instructions maintain product integrity to produce a safe and legal product meeting customer requirements. The system has been developed to produce safe & legal products. Relevant legislation and codes of practice such as EC1935/2004, EC 2023/2006 and EU10 /2011 have been fully considered in the construction of the system.
Products are described as thermoformed trays, punnets and blister packs used to store and transport a wide range of Products such as fresh vegetable and cosmetic products. Products incorporate virgin and recycled materials. Company and Supplier D of C's confirm compliance to relevant industry legislation and also include materials used in the manufacturing process, specifically rPET and Polystyrene and also include the product limitations of use where applicable.
There is a Process Flow diagram in place (verified by Caroline Gillies on 21/02/2017) defining all the operations undertaken on site. Process steps include raw materials, tooling, storage, process steps, stacking, packing, delivery, despatch and customer returns.

The flow chart was verified by the team as part of the annual Management Review meeting. All manufacturing process steps have been detailed within the flow.

The site has considered and documented potential hazards relating to the manufacturing processes undertaken. Hazards have been identified along with a substantial focus on maintaining and monitoring the site-wide PRP's. Risk is assessed through a risk x severity scoring mechanism to determine any critical control points. Typical hazards include pests, dust, product not manufactured to specification, incorrect material, glass, foreign bodies and the potential for malicious intervention as part of the site's security procedures.
Control measures have been identified for all hazards associated with the manufacturing process in the form of prerequisites along with Quality Procedures and Works Instructions to include preventive maintenance, hygiene rules, glass and brittle plastics control, training, pest control, housekeeping and cleaning, traceability, purchasing, control of chemicals, quality checks and site security.

The site has carried out an assessment as part of the Hazard Analysis to determine the need for CCP's. The outcome of the assessment was that there are no CCP's present in the process. A threat analysis Issue 2, dated 31/03/2017 has been documented for the thermoforming process to identify risks associated with production and working practices to reduce any potential hazards.

Any other out of specification material that is identified throughout the process follows the "Control of Non-Conforming Product" procedure. Corrective and preventative actions are documented accordingly.
Hazard & Risk analysis review takes place as a minimum, annually. The team review all aspects of study and documents the findings accordingly. The review was last conducted as part of the annual Management Review meeting and also

via a standalone review on 04/04/2017 where changes were made to the system taking into account the changes to site processes.
If or when a significant change occurs the team are reconvened to re-evaluate the risk analysis study.
A Hazard & Risk Management Team Meeting was also undertaken to assess hazards and the H&RM system on 04/04/2017.

2.3	Exemption of requirements based on risk analysis

System Validated: 08 & 09 April 2017
The system has been implemented in accordance with the requirements of the standard.

Challenged at this Audit: 2017-GMW
Clause is not applicable

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

System Validated: 08 & 09 May 2017
There is a QMS in place designed to meet the requirements of the BRC Packaging standard. The QMS at the site is both hard copy and electronic. The system cross-references all the relevant Quality Procedures, Hygiene Procedures and Works Instructions as part of the system. All key employees have read only access to the QMS documents held on the system. The Company Secretary is the only person on site who can make changes to and authorise the QMS documentation. The QMS is reviewed on an on-going basis when any changes to systems or processes occur, or when there is a revision to the BRC Standard. The QMS is also reviewed at the Management Review meeting and through the internal audit process.

Challenged at this Audit: 2017-GMW
The Quality Manual is split down into multiple sections to address the various sections of the standard and is currently at Issue 2, dated 11/04/2017.

3.2	Documentation control

System Validated: 08 & 09 May 2017
The site has effective document control procedures in place.

Challenged at this Audit: 2017-GMW
Documentation Control Procedure CP3 Issue 1, dated 09/11/2015.
All documents are formatted by 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 "Document Master List" Doc, dated 12/04/2017 along with the reason for the change. Site documentation is controlled and amended when applicable, in collaboration with relevant process owners, by the Company Secretary, who then authorises all new or amended documents before re-issue. Obsolete documents are retained for 2 years and then discarded. Electronic documents are protected on password protected system which incorporate anti-virus and firewall controls on a stand-alone computer. The quality manual is reviewed upon the request to change documentation or as a minimum, annually.

A Non-Conformance has been raised against clause 3.2.1 of the Standard. The Document Master List contains insufficient detail for the amendments made to documents. See Minor 1.

3.3	Record keeping

System Validated: 08 & 09 May 2017
Records are kept on site in accordance with the requirements of the standard.

Challenged at this Audit: 2017-GMW
Documentation Control Procedure CP3 Issue 1, dated 09/11/2015.
Record Keeping is covered under section 3.3 of the Quality Manual. Hard copy records of quality inspections and approvals are held in bespoke job bags relevant to each order. Records are initialled or signed by the relevant Operator or Manager. All changes to documents and records are recorded along with the reason for the change. The system is both computer and 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 a minimum of 2 years. Examples of site records include purchase orders, maintenance records, cleaning records, pest control records, Records for nonconforming material, management review minutes and calibration certificates.

3.4	Specifications

System Validated: 08 & 09 May 2017
Specifications were challenged and found to exist for Raw Material, Finished Product and Services. Specifications for Raw Materials and Declarations of Compliance are documented under Section 3.4 of the site Product Safety & Quality Manual. All finished goods specifications are reviewed annually by the site's Operations Manager.

Challenged at this Audit: 2017-GMW
Specifications Procedure CP4 Issue 1, dated 09/11/2015.
Control Procedure 25 for Disposal of Trademarked Materials Issue 1, dated 01/04/2016.
Specifications were challenged for raw materials and finished goods. 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 has been signed off. Specifications are agreed with customers for all orders prior to any production run taking place. The company ensures materials are safe for use with food and a generic Declaration of Compliance in place for all products produced at the site which is available to Customers on request; and is fully compliant with the requirements of the standard and includes the materials used in the composition of products, legislative requirements/compliance and also defines product usage parameters. The Declaration of Compliance is signed by the Operations Manager and is dated 05/04/2017 and is valid for one year. Where trademarks are applied to the packaging, customers have provided written disclaimers to authorise the destruction of material through closed-loop re-granulation. There is a specification review process in place. The order processing procedure entails conducting a specification review on each order by the CST. All changes or amendments to existing specifications are reviewed prior to production. Electronic specifications are held on password protected systems with anti-virus controls.

A&K Ecofilm Declaration of Compliance for Clear/Black RPET meeting regulations of EC10/2011. Issue 6, dated 16/01/2016. Legislation covers the use of post-consumer recycled materials used in substrates supplied.

SGS Independent Report for ReCoupet Black PET on 05/09/2013. Test Report: BAN 179131/1d.

Propac off the Shelf Product Specification for Code HP43-40 Tomato Punnet in RPET. 430 x 130 x 180mm in Clear or Black, with Recycling Code 1. 900 SKU's per box with Blue Tint Poly Liners. Total per pallet, 22,500 SKU's. Statement on specification to include that all finished products comply with food contact legislation in line with EC directives as per the site's documented Declaration of Compliance.

Propac Declaration of Compliance for RPET trays signed by G. Dollard (Operations Manager) on 05/04/2017.

3.5	Internal audits

System Validated: 08 & 09 May 2017
There are formal procedures in place for internal auditing of site operations. The Internal Audit procedure is Doc. Ref. CP05 at issue 1, dated 10.11.15. Internal audits are undertaken at a pre-defined frequency based on the risks associated with the activity.
There is an audit schedule in place for as an appendix to the procedure with audits covering the scope of site operations and ensures all key activities, processes and procedures implemented to achieve the standard are subject to Internal Audit at least annually.
Internal audits are conducted by the Company Secretary and M.D. to ensure impartiality. The Company Secretary has been trained formally by REM Associates in Dec 2011 and has in turn internally trained the M.D. Considerations are underway for the training of 2 further onsite auditors during 2017.

Challenged at this Audit: 2017-GMW
Internal Auditing Schedule dated from December 2016 through to November 2017. Each section of the BRC 5 Global Standard is audited once per year.

1. Section 1 of the standard – Audited by the Company Secretary on the 23/06/2016. No nonconformities were raised and sufficient documented evidence of conformity was in place detailed on the asociated Internal Audit report.
2. Section 3 of the standard – Audited by the Company Secretary on 16 & 17/11/2016. 2 N/C's were raised (which has been closed out) and sufficient documented evidence of conformity was in place detailed on the asociated Internal Audit report.
3. Section 4 of the standard – Audited by the Company Secretary on the 17/02/2017. No nonconformities were raised and sufficient documented evidence of conformity was in place detailed on the asociated Internal Audit report. A recommedation to employ a full-time hosekeeper was made, with the issue addressed on 11/04/2017.

N/C's were recorded on the associated Correction Action Report with root-cause analysis completed and documented as part of the investigation. N/C's are required to be completed within a set timeframe, typically within 28 days. The completion of corrective action is signed off on Internal Audit Form by the Auditor.

3.6	Supplier approval and performance monitoring

System Validated: 08 & 09 April 2017
The company has a supplier approval and monitoring system in place as procedure CP06 Issue 1, dated 10/11/2015. Proposed new suppliers are identified by the Managing Director. Suppliers must complete and return a self-assessment questionnaire in the first instance and if deemed acceptable are then asked to provide evidence of certifications and are subject a trial period. The self-assessment questionnaire is split into key sections focusing on the supplier's internal quality systems and procedures. After a successful trial period the Supplier is added to the ASL. Suppliers must hold accreditation to a recognised Quality Management Standard in order to supply.
Suppliers are monitored by the Company Secretary or Operations Manager through non-conformances, technical performance, delivery performance and price and results are retained on site.
The site maintains a full and current list for all suppliers. Suppliers are not used that are not on the approved suppliers list, but if an exception needed to be made this would be done on a batch or delivery basis and may take the form of a Certificate of Analysis or Declaration of Compliance.

Challenged at this Audit: 2017-GMW
A&K Ecofilm (RPET Supplier). BRC 5 Packaging Certificate expires 26/07/2017.
TDX (RPET Supplier). BRC 5 Packaging Certificate expires 29/11/2017.
Plastirol (Plastic Film). FSSC 22000 Certificate expires 14/12/2019.

3.7	Management of subcontracted processes

System Validated: 08 & 09 May 2017
Subcontracting of suppliers is documented under Section 3.7 of the site's quality manual. Assessment of subcontracted suppliers is carried out as per suppliers of product/materials. Customers are informed of all tasks undertaken by subcontractors when orders are produced. All goods manufactured are returned to the site for final approval and are only released direct to customer upon rare and express email approval from the end user.
The site carries out a subcontracting process through Leeds Vacuum Formers.

Challenged at this Audit: 2017-GMW
Subcontracting of padding carried out by LVF. Declaration of Compliance Issue 12 dated 22/02/2017. BRC 5 Global Packaging Certificate through NSF Knight expiry 04/12/2017. Audit carried out on 02/12/2016 by Operations Manager and found to be compliant.
12/10/2016 email concession from Blue Earth to authorise direct delivery.

3.8	Management of suppliers of services

System Validated: 08 & 09 May 2017
The company use several suppliers of services e.g. pest control, transport and Waste Management. The management of these suppliers is covered by procedure CP7 Issue 1, dated 20/112015. Service specifications for suppliers of services are in place.

Challenged at this Audit: 2017-GMW
Rentokil - Signed Service Specification dated 24/08/2000
B & M Waste Management – Signed Service Specification dated 17/12/2015. NQA certificate 15337 expires 11/08/17.
L E Jones Transport – Signed Service Specification dated 28/11/2015 Site has dealt with this company since 1999.

3.9	Traceability

System Validated: 08 & 09 May April 2017
The company has thorough and robust traceability procedures in place to identify its products through all stages of the manufacturing processes from the intake of Raw Materials to the dispatch of Finished Goods. Defined as Control Procedure CP08 Issue 2, dated 22/02/2017. The Company identifies raw material by Batch Number, Reel Number and Purchase Order No. Unique Job Numbers are allocated to each production run and are then maintained on all documentation through the manufacturing process to ensure full traceability. Any product found to be defective would be identified and segregated from similar conforming product. The company identifies W.I.P., finished products and quarantined items with labels. Re-labelling is undertaken if a part reel is returned to stock with a photocopy of the original order details to prevent loss of batch information. Customers can identify product from the box or pallet label and the delivery note. This information can be traced back to the original material used in the production of the product. Labels carry Customer Name, Item No, Batch No, Pallet Quantity, Box Quantity, Pallet Number and production date.

Challenged at this Audit: 2017-GMW
Traceability exercise carried out by the site on 25/11/2016.
For Raw Materials through to Finished Goods a delivery supplied by Plastirol on GD220916 for 26 pallets, 52 rolls totalling 21,617kg supplied on 18/10/2016. Traced through job sheets where 46 rolls totalling 19,179kg were used on customer delivery notes 7851 and 7868. A second customer received goods on delivery notes 7885, 7844, 7862 and 7847. Trace exercise identified the inclusion of batch/order numbers being included on job sheets to improve the timings and detailing of the exercise.

For Finished Goods back to Raw Materials delivery note 7830 was used for product PA-ZZ-031-30764 for 4 pallets of a Single Cavity item. Job Number 4891 was identified from the delivery note where 6 pallets of product were produced

using 451µm x 620mm sheeting supplied by R&K EcoFilm and TDX. Two further pallets of finished goods of the same finished item were shipped on Delivery Note 7831.

3.10	Customer focus and contract review

System Validated: 08 & 09 April 2017
Customer Related Processes & Contract review is fully defined in section 3.10 of the Quality Manual as is substantiated by the Order Processing Procedure CP09 Issue 1, dated 02/12/2015. The documentation details who is responsible for ensuring Customer requirements are met and expectations delivered, examples being the Company Secretary, Operations Manager and Internal Administrator. Customer related processes include enquiries, quotations & order processing, manufacture, inspection and positive release. The Production Manager is made aware should any modifications
How meeting Customer's expectations is met is measured through customer feedback, nonconformities, complaints and ongoing Customer retention. All nonconformities and complaints are recorded and acted upon immediately. Ongoing contact with Customers is driven primarily via the Sales and Operations functions and feedback from Customers is continually fed back to the site and reported on at the annual Management Review meeting.

Challenged at this Audit: 2017-GMW
P0201828 requested for 06/04/2017 Qty 187,200 SKU's. Description J&J 600mic Tray, Job Number 8947.
Delivery Note Number DN8108-1. 26 pallets

3.11	Complaint handling

System Validated: 08 & 09 April 2017
Customer Complaints form part of the Non-conformance procedure CP21, Issue 1, dated 12/112015. Customer complaints come in to the business primarily via phone or email and are logged on the Non-conformance Register. Complaints are investigated using root cause by the Operations Manager, relevant actions assigned to designated company personnel and the complaint is then closed out through customer liaison. There have been 1 Customer complaint so far this year against a target of 0. Complaints are trended where they can be with the results forming part of the annual management Review meetings.

Challenged at this Audit: 2017-GMW
Complaint No 77 – Raised on 13/03/2017 from Blue Earth due to trays found in 2 boxes with crush damage. Root cause has been identified as an incident when loading by the haulier after checking of despatch documents on site for product integrity. 500 trays affected which were scrapped by the customer after receipt of photographic evidence of the affected material. Job number 8252 which resulted in customer credit and close-off on 13/03/2017.

3.12	Management of product withdrawals, and incidents and product recalls

System Validated: 08 & 09 April 2017
Product Withdrawals, Recall & Incident Management is documented as procedure CP10 Issue 1, dated 10/11/2015, and is compliant with the requirements of the standard. The Incident Management Procedure Doc. Ref. CP11 at issue 1, dated 10.11.15 lists the type of event that would constitute an incident e.g. glass breakage or chemical spillage as well as contaminated items being sent to the Customer. Investigations following a decision to withdraw a product incorporate root cause analysis, corrective action & preventative action. The incident management team is defined as the Company Secretary, Operations Manager and the Company Secretary. All incidents are recorded and acted upon immediately. The procedure is capable of being put into operation at any time. The M.D. 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 Company Secretary.

Challenged at this Audit: 2017-GMW

Last test of the product recall test carried out on 28/03/2017 for 216,000 trays for Blue Earth. Job Number 8698 for 120g Snack Pot. Actual withdrawal initiated by the site and not the customer. The root cause was due to two cavities not cutting properly on the former during a production run, which resulted in the replacement of 10x blades. Upon replacement the operator identified that shards of plastic were evident on the trays made and it could not be determined of the whole order was affected. All material was uplifted prior to being shipped out to the customer for placement in quarantine. Upon inspection of the tooling it was determined the cutter anvil was warped. The site has not been involved in a product recall since the previous audit.

A Non-Conformance has been raised against clause 3.12.8 of the Standard. Timings for key activities have not been recorded as part of the site's Annual Product Recall System test. See Minor 2.

Non-applicable clauses	

4. Site Standards

4.1 External standards

System Validated: 08 & 09 April 2017
External site standards were observed to be appropriately maintained. The site is situated on an Industrial Estate in Hyde, Greater Manchester and local activities do not pose any risks to the product. The site comprises 2 units inclusive of warehousing, production facilities and office and welfare areas. There is also a small off-site storage facility utilised for storage of raw materials. The building fabric is steel cladding over brick construction and is maintained to a high standard. There is a clean and unobstructed area along the external walls of buildings

Challenged at this Audit: 2017-GMW
All grounds within the site were seen to be controlled, managed and maintained to a high standard at the time of the assessment. The site is gated and has a steel fence perimeter on all sides. External traffic routes are suitably surfaced. External pipe work or other access points for product and/or raw materials are appropriately sealed so as to prevent pest entry with the exception of gaps noted to the top of the roller shutter doors. Drains are trapped / protected. Natural drainage is deemed adequate. There is no external storage of raw material.

4.2 Building fabric and interiors

System Validated: 08 & 09 April 2017
Building fabric and interior areas were observed to be well maintained.

Challenged at this Audit: 2017-GMW
All walls floors and ceilings were observed to be adequate and in an acceptable condition. Floors are sealed, painted concrete and there are designated route ways in production and storage areas. Internal drains are protected with suitable gratings in place. Lighting in production was observed to be adequate and is subject to shatterproof and/or protective tubing or bulbs. The site is also undergoing an ongoing installation of improved LED lighting in production areas. There are no windows in the production areas that could pose a risk to the product. Suitable ventilation of natural provision was in observed to be in place. There are no suspended ceilings.

4.3 Utilities

System Validated: 08 & 09 April 2017
Potable water is supplied to site by United Utilities and does not come into contact with the product, therefore water testing is deemed unnecessary. No wooden furniture observed in production areas and the upper mezzanine canteen area had wooden tables which were sealed and free from damage.

Compressed air used in operations is filtered; oil separated and dried but also does not come into direct contact with the product. There are 3 compressors on site subject to scheduled servicing by Airmatic Compressors Ltd.

Challenged at this Audit: 2017-GMW
Water reports from the supplier's website are held on site. Compressors were last serviced by Airmatic. Report No 2951 for machine serial number AP1008845 on 05/01/2017 to conclude cleaning and the change of filter bags. Service schedule in place for Rotonair compressor based on use after 100 hours. (HPCBSD75TSFC).

4.4	Security

System Validated: 08 & 09 May 2017
The site is secure and has systems in place to ensure the integrity of products and processes. All external doors are provided with lockable hinged screens to prevent access during periods of hot weather. The site does not have external tanks, silos or intake pipes requiring coverage under a security assessment.

Challenged at this Audit: 2017-GMW
Site security arrangements are in place documented in procedure CP12, Issue 1, dated 11/11/2015 along with a documented risk assessment Doc. Ref. CP12, Issue 1, dated 20/04/2016. Visitors are required to sign-in with name, company, time and date and complete a Health Questionnaire which is then checked by the company host prior to entry into the production areas.
The unit is standalone and totally secure. There are keypad entry systems at the entrance to the plant. There are strategically placed CCTV cameras at various locations around the site, both internally and externally along with security lighting and a sophisticated alarm system. All entrances are locked outside production hours. Staff are encouraged to challenge unknown/unidentified visitors.

4.5	Layout and product flow

System Validated: 08 & 09 May 2017
The factory layout is appropriate and prevents the risk of product contamination where necessary.

Challenged at this Audit: 2017-GMW
There are plans of the site in place dated 28/10/2014 for the main production facility, 07/01/2016 for the warehouse facility and 03/10/2016 for Unit 4 containing the newly-installed Kiefel Thermoformer KMD78. All site plans show where required all access points for personnel, staff facilities, storage areas & people & product flow. The layout of the site is logical and the manufacturing flow from receipt of raw materials to the despatch of finished goods has considered the risk of any potential contamination. Sorting and reworking is undertaken in a designated area of the warehouse for material being returned to supplier for recycling away from the main production facility. There are line clearance and QC procedures in place on job changes. Segregation in production consists via departmental layout, e.g. manufacturing, raw material and finished goods storage.

4.6	Equipment

System Validated: 08 & 09 May 2017
All equipment is suitably designed for the purpose of thermoforming reels of film into trays punnets and blister packs for the food and non-food industry.

Challenged at this Audit: 2017-GMW
Machinery is designed to minimise any risk of contamination to the product. On site there is one Keifel and three Illig thermoforming machines in operation at the site. A new machine (Kiefel KMD78) has recently been purchased and has recently been commissioned. All machinery is designed to facilitate cleaning and maintenance programs. Notices on equipment were seen to be laminated and secure. All new equipment is thoroughly specified before use.

4.7	Maintenance

System Validated: 08 & 09 May 2017
There is a Planned Maintenance schedule in place defined under section 4.7 of the Quality Manual, which is performed to a schedule managed by the Operations Manager and Company Secretary. All equipment on site is subject to six-monthly maintenance/service schedule by the manufacturer and records are retained by the Operations Manager. Temporary modifications are allowed in emergencies and must be recorded and scheduled for a permanent repair as soon as possible. The site also has a sonic bath for the cleaning of used tooling after production. Following maintenance work the engineer completes a Post Maintenance Hygiene Clearance Checklist to declare the line is clear to resume production. Records challenged and line clearance was observed completed for the above sampled maintenance.
The small workshop area was observed to be tidy and well maintained and is away from the production area.

Challenged at this Audit: 2017-GMW
Specific maintenance was reviewed for maintenance undertaken on all the three Illig Thermoforming lines on 10/02/2017 and previously on 16/09/2016. Service reports include checking the pneumatics, vacuum equipment, forward feed mechanism, lower mould station and replacement/service of components where necessary. One food grade lubricant is used on site, Interflon Fin Lube TF.

4.8	Housekeeping and cleaning

System Validated: 08 & 09 May 2017
Production staff are responsible for cleaning their own machines and surrounding areas. Staff facilities and all welfare areas are also cleaned by a designated cleaner who has recently been employed to carry out daily housekeeping. Site cleaning is carried out daily to include toilets, canteen, offices, production floors, warehouse areas and the site car park.

Challenged at this Audit: 2017-GMW
The housekeeping and cleaning procedure is defined in in the Cleaning Procedure Doc. Ref. CP13, Issue 2, dated 16/02/2017. There is a clean as you go policy in place. In addition to the clean as you go policy there are numerous cleaning schedules are in place for production and storage areas that are compliant with the requirements of the standard. Cleaning schedules were reviewed for all office areas, staff facilities and production areas and were observed completed for dates through 1st to 8th May 2017. A documented full deep clean had been carried out at the site on 20/01/2017.
Verification of cleaning is undertaken by the Operations Manager. There is a designated locked storage cupboard cleaning equipment and materials located on the ground floor. Toilet cleaning equipment is colour coded red & is segregated. No strongly scented chemicals were notes during the assessment. All areas were found to be very clean and tidy, with good standards of housekeeping evident throughout the site visit.

A Non-Conformance has been raised against clause 4.8.2 of the Standard. Machine cleaning records have not been fully documented as part of the schedule. See Minor 3.

4.9	Product contamination control
4.9.1	Glass, brittle plastics, ceramics and similar materials control

System Validated: 08 & 09 April 2017
The site has put into effect processes and procedures to minimise foreign body contamination. There is a site wide glass register in place which is completed on a quarterly basis and is administered by the Office Administrator. Results are recorded onto the numerous site wide registers. Registers were reviewed during the assessment and observed to be up to date. Registers include low risk items such as clock faces and all non-production glass and similar material.

There is a glass breakage procedure in place and forms part of the "Contamination Control" policy. Glass breakages are recorded on an incident report.

Challenged at this Audit: 2017-GMW
The "Contamination Control" policy is defined in Doc. Ref. CP15, Issue 1, dated 11/11/2015. Glass is kept to a minimum in production and storage areas. A full inspection of glass was completed on 05/05/2017 and signed for verification. One cracked gauge cover reported on Illig R35D machine posed no risk to the product being made and replacement ordered.

There is a glass breakage procedure in place and forms part of the "Contamination Control" policy. Glass breakages are recorded on an incident report. One incident of breakage has occurred and was reported. A cracked screen was found on the Illig RV35C machine on 17/10/2016. There was no risk associated to the product being made and a replacement screen was installed.

4.9.2	Sharps control

System Validated: 08 & 09 May 2017
Systems and procedures are in place to control sharp objects on site. Blade changes for machinery are documented and carried out as part of engineering service requests.

Challenged at this Audit: 2017-GMW
There are sharps procedures in place at the site defined in the "Contamination Control" policy Doc. Ref. CP15 Issue 1, dated 11/11/2015. Knifes and blades are not used in production and all machine operators are provided with scissors, which are allocated to each line and identified accordingly and inspected regularly by the Operations Manager for any damage. Quarterly review of Scissors carried out on 24/02/2017 and reviewed/verified by the Company Secretary. Etched Scissors (2 pairs at each station) marked-up for Illig RV53, Illig RD53, Kiefel 1 KMD60 and Kiefel 2 KM78.

4.9.3	Chemical and biological control

System Validated: 08 & 09 May 2017
There is a formal control system in place for chemicals. The site maintains a list of approved chemicals and data sheets for chemicals are maintained on site. The company have assessed the controls in place using the hazard analysis system. These controls have been designed to prevent chemical and microbiological contamination. Cleaning chemicals were observed to be controlled, labelled, stored in closed capped containers with manufacturers' instructions available and stored away from production in secure designated locations at the time of the assessment.

Challenged at this Audit: 2017-GMW
Interflon Food Grade Lubricant reference P01 dated 29/06/2010
Carlube Moly Grease (for thermoformers) Data Sheet Issue 4 dated 15/04/2017
HD2 Grease Data Sheet Version 2 dated 12/02/2015
Interflon Eco Degreaser Version 1 dated 10/03/2016

4.10	Waste and waste disposal

System Validated: 08 & 09 May 2017
General waste is collected in wheelie bins and transferred to external skips that are removed by licensed waste merchants. Process skeletal trim is sent back to the film suppliers for recycling and is stored in the separate raw materials warehouse away from production areas once baled. All refuse containers are suitably labelled.

Challenged at this Audit: 2017-GMW
There are formal controls in place for the waste disposal which is managed by the Company Secretary in accordance with legislative requirements. There are 2 waste streams at the site; general waste and dry mixed recycling waste.

Contractor information as follows: - Bagnall & Morris take general waste away from site and Suppliers of film take all process waste away from site for recycling. Trademarked waste is not currently generated.
Waste Licence Number for Bagnall & Morris – CB/PM3684GP with an expiry date of 25/06/2017.
Skeletal waste Purchase Order P0783 for the return to TDX of 320kg of Clear RPET and 5662kg of Black RPET. Email confirmation of return from supplier on 03/04/2017. Delivery note 8100 documented to acknowledge closed-loop return of material for recycling.

4.11	Pest control

System Validated: 08 & 09 May 2017
The site has an effective Pest Control program in place and has minimised any potential risk of infestation. This a Pest Control Procedure in place defined under section 4.11 of the Quality Manual. There is a Contract Agreement in place with Rentokil covering rodents and insects, both internal and external baits are used along with EFK's. Rentokil is a member of the BPCA, membership No. M15/035. The site does not undertake any of its own pest control activities.

Challenged at this Audit: 2017-GMW
Rentokil carry out 8 routine visits, 4 EFK inspections and 2 biologist visits per year. The EFK contract includes catch analysis each visit and an annual tube change. The contract agreement covers woodlice, spiders, midges, moths, butterflies, craneflies, flies and rodents. The last routine visits took place on and 13/04/2017, 22/03/2017 and 13/10/2016 with 1x recommendation on the last visit to seal around pipes in the new Unit 4 building, which has been completed.

The last recorded EFK inspection and catch analysis also took place on 28/04/2017 with low counts recorded in all units. The last biologist visit was undertaken on the 12/04/2017. Training records are in place for Siobhan O Mahoney and Colin Clarke who both hold relevant training certificates. A register of pesticides along with safety data sheets is in place, example being Bromatrol Bait Blocks. There is an up to date site plan in place displaying all pest control devices which has been authorised by the contractor and is dated 12/04/2017 which include the satellite storage warehouse and Unit 4 for the new Kiefel KMD78 machine.

Non-applicable clauses	4.1.5, 4.2.2, 4.4.3, 4.10.4, 4.9.2.4, 4.10.4 & 4.11.3

5. Product and process control

5.1	Product development

System Validated: 08 & 09 May 2017
Product development is undertaken on site and is documented in the "Product Development" procedure CP16 at issue 1, dated 11/11/2015. New enquiries typically come in via the sales contact and the brief is then drawn up in a CAD program and the drawing is sent to the customer for approval. Resin prototypes are created. Once the resin prototype sample has been approved by the Customer, the aluminium tool is then created and the production run is scheduled into the factory. Product specification sheets are created for all products. Production trials do occasionally take place and are documented. Samples and kept in storage for the life of the product. All product containing recycled materials are correctly specified on the associated works instructions. All products manufactured at site comply with EU10/2011 regulations.

Challenged at this Audit: 2017-GMW
Email approval from customer dated 15/07/2017 for tooling of products HP125-30, HP125-50 and HP125-70. New Tomato Punnet tooling based on sample approvals sent on 15/02/2017.
Propac Tool Order Form and Purchase Order 050417/GD for manufacture of tooling formes at EVG.
Retained Approved First Off Samples HP125-50 dated 31/01/2017 for 310 Black APET.

Propac Job Sheet for HP125-50, HP125-30 and HP125-70 for in floor quality checks carried out on each pallet with roll number traceability. Retained reel labels from supplier in job pack.

5.2	Graphic design and artwork control

System Validated: 08 & 09 May 2017
No graphic design undertaken at the site.

Challenged at this Audit: 2017-GMW
No graphic design undertaken at the site.

5.3	Packaging print control

System Validated: 08 & 09 May 2017
No printing undertaken at the site.

Challenged at this Audit: 2017-GMW
No printing undertaken at the site.

5.4	Process control

System Validated: 08 & 09 May 2017
The site has procedures in place to ensure effective control of all operations relating to critical product defects. 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 Management Team continually review on site processes to ensure consistency of product is maintained. Established controls are in place to ensure product integrity with corresponding manufacturing SOP's and a robust control of non-conforming product procedure. Production specifications and machine settings are available for all products. Specifications are approved internally 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 various processes in operation on site and examples of typical machine settings would include top, bottom and outer heater temperatures, mould time, cutter dwell time, eject speed and cycle time. The Works Order defines the product specification, bill of materials and process set up of the production machinery. There are first off inspection regimes in place. All first off samples must be signed off by the experienced setter/operators. Following first off sample sign off, there are in-process inspections defined through SOP's and recorded at least 3 times per pallet on the Job Sheet. Viewed completed inspection results for the jobs in production during the assessment.
Line clearance is in the form Appendix 9 Issue 1, dated 08/12/2015 which is completed at the start of every run by production personnel who conducts line clearance before a new order is run.
New jobs are re-specified through customer liaison and formal documented approval procedures.

Challenged at this Audit: 2017-GMW
Illig RV53 Job 9018. Product 20068 for a Clear Styrolux Tray 460µm x 525mm. Roll Label 060117/GD. Completion of Engineer set-up Pre Check Sheet. Visual checks carried out on material every 15-20 minutes. Cycle speed 30.1. Forming pressures and de-mould times recorded via computerised forming programme on machine. Tool cavity number formed onto finished item.
Illig RD53 Job 9058. 120g Snack Pot. Roll Label 190417/GD. Completion of Engineer set-up Pre Check Sheet. Visual checks carried out on material every 15-20 minutes. Cycle speed 30.1. Forming pressures and de-mould times recorded via computerised forming programme on machine. Tool cavity number formed onto finished item.
Kiefel KMD60B Job 9075. 140g Black Tray RPET. Roll Label 100417/GD. Completion of Engineer set-up Pre Check Sheet. Visual checks carried out on material every 15-20 minutes. Cycle speed 44.2. Forming pressures and de-mould times recorded via computerised forming programme on machine. Tool cavity number formed onto finished item.

5.5	Calibration and control of measuring devices

System Validated: 08 & 09 May 2017
The site has 2 pieces of calibration equipment: Linear 12”/300mm digital caliper and a Mitutoyo 6”/150mm digital caliper used for spot checks on the thickness of sheeting prior to being thermoformed. Section 5.5 in the site’s Quality Manual documents that material found out of specification due to faulty measuring equipment is quarantined for further inspection and the non-conforming equipment repaired or replaced.

Challenged at this Audit: 2017-GMW
Linear 300mm Caliper. Calibrated annually by Aspland Gauge, certificate 71741 dated 03/04/2017
Linear 150mm Caliper. Calibrated annually by Aspland Gauge, certificate 71742 dated 03/04/2017

5.6	Product inspection, testing and measuring

System Validated: 08 & 09 May 2017
Setters and machine operators carry out quality checks throughout the production run and record the results on the Job Sheet. The Operator checks one stack of finished product every roll change. Quality checks are visual and include webs, cavities not Formed, scratches/lines, tooling marks, excessive material on forming, splitting, de-nests flanges, crushing, trim, general form quality and contamination. Quality checks were challenged during the assessment and found to have been completed for jobs in production during the site production tour.
There is no in-line product testing in place but hazard and risk analysis has not been used to determine this.
Migration testing is undertaken by suppliers as and when necessary.

Challenged at this Audit: 2017-GMW
Illig RV53 Job 9018. Product 20068 for a Clear Styrolux Tray 460µm x 525mm. Roll Label 060117/GD. Completion of Engineer set-up Pre Check Sheet. Visual checks carried out on material every 15-20 minutes. Cycle speed 30.1. Forming pressures and de-mould times recorded via computerised forming programme on machine. Tool cavity number formed onto finished item.
Illig RD53 Job 9058. 120g Snack Pot. Roll Label 190417/GD. Completion of Engineer set-up Pre Check Sheet. Visual checks carried out on material every 15-20 minutes. Cycle speed 30.1. Forming pressures and de-mould times recorded via computerised forming programme on machine. Tool cavity number formed onto finished item.
Kiefel KMD60B Job 9075. 140g Black Tray RPET. Roll Label 100417/GD. Completion of Engineer set-up Pre Check Sheet. Visual checks carried out on material every 15-20 minutes. Cycle speed 44.2. Forming pressures and de-mould times recorded via computerised forming programme on machine. Tool cavity number formed onto finished item.

5.7	Control of non-conforming product

System Validated: 08 & 09 May 2017
Control of Non-conforming product is covered by procedure CP21 Issue 1, dated 12/11/2015. The procedure details controls required for out of specification product, including labelling and quarantining. A decision is made to hold or reject and corrective and preventative actions are then implemented. Internal nonconformities are brought to the attention of the Operations Manager immediately who then oversees the subsequent investigation using root cause analysis.

Challenged at this Audit: 2017-GMW
There is a non-conformance log in place. Complaint No 77 – Raised on 13/03/2017 from Blue Earth due to trays found in 2 boxes with crush damage. Root cause has been identified as an incident when loading by the haulier after checking of despatch documents on site for product integrity. 500 trays affected which were scrapped by the customer after receipt of photographic evidence of the affected material. Job number 8252 which resulted in customer credit and close-off on 13/03/2017. The site has a very low number of nonconformities and all process scrap is returned to supplier via a closed-loop system for re-granulation.

5.8	Incoming goods

System Validated: 08 & 09 May 2017
All incoming goods are visually checked by Warehouse Operatives for taint, odour, contamination & damage in accordance with procedure CP19 Issue 2, dated 14/02/2017. The vehicle is also checked for overall hygiene and if acceptable the delivery note is signed and the material is unloaded and put to stock & used in conjunction with FIFO principles. A small lorry is used for the transportation of raw materials from the satellite warehouse to the site, covering a distance of 0.5 miles. A Goods Inwards Checklist is attached to all delivery notes between sites for product identification.

Challenged at this Audit: 2017-GMW
PR002544 for 310µm x 790mm, receipted from P0280317GD from TDX, traceability reference B217043N. Product and vehicle checks were undertaken by Mark Artingstall – Warehouse Manager.

5.9	Storage of all materials and intermediate and finished products

System Validated: 08 & 09 May 2017
Storage of materials are undertaken in accordance with procedure IPMPR-021 at issue 4, dated 14.03.16. The procedure covers, receiving goods, loading outgoing goods, storage, return handling, internal product movement, order picking, stock taking, stock rotation, warehouse security & warehouse hygiene. All raw materials and finished goods are suitably identified with labels & wrapped to avoid contamination where necessary and stored in controlled environments which includes an off-site warehouse ½ mile away which was also visited during the assessment and found to meet with the requirements of the standard. During the assessment it was observed that raw materials and finished product were kept segregated. There are no hazardous chemicals on site.

Challenged at this Audit: 2017-GMW
PR002544 for 310µm x 790mm, receipted from P0280317GD from TDX, traceability reference B217043N. Product and vehicle checks were undertaken by Mark Artingstall – Warehouse Manager. Palletised and securely wrapped with full labelling to identify stored product.
08/05/2017 310x620 black material for 140g Trays for skeletal waste recycling fully wrapped and identified.
Forme Clamp Frame storage reference ID 20700B,

5.10	Dispatch and transport

System Validated: 08 & 09 May 2017
All finished goods are checked along with the vehicle before loading and must be signed off on the Delivery Note before the vehicle leaves the site in accordance with procedure CP 20 Issue 1, dated 12/11/2015. Any damaged pallets that arrive from suppliers are brought to the attention of the Warehouse Manager and appropriate actions taken. Agreed terms of business are in place with numerous transport organisations. Delivery drivers are supervised whilst on site and must abide by the company hygiene rules. There is one company transport vehicle used to shunt raw materials from the off-site warehouse to the site and is subject to documented cleaning schedules.

Challenged at this Audit: 2016-SM
Reviewed for a delivery of 26 pallets of Purchase Order PO203113 for item tray 20068 on delivery note 8174. The transport company used was MPF and vehicle hygiene checks were undertaken and documented by Mark Artingstall – Warehouse Manager
Transport contracts reviewed for L.E Jones Transport – Signed Service Specification dated 28/11/2005. Site has dealt with this company since 1999.
Vehicle inspection stamp for delivery note 8108 on 05/04/2017, Registration no P015 AYS by Mark Artingstall.

Non-applicable clauses	5.2, 5.3, 5.6.3, 5.6.6

6. Personnel

6.1 Training and competence

System Validated: 08 & 09 May 2017
There are formal training procedures in place at the site managed under the stewardship of the Company Secretary. All new employees are subject to an induction program comprising site safety, quality and hygiene issues amongst other subject matter.
Each employee has their own training file. All training undertaken by employees is recorded and signed off on the Training Record. Temporary staff when employee are provided a full induction similar to the induction received by a full-time employee.
Training requirements are reviewed every on an annual basis by the Senior Management Team and also when there are any changes to site procedures.
Each employee is subject to refresher training programs and records of this are documented. Examples of refresher training undertaken at the site are Hygiene refresher training, fire refresher training, PPE refresher training and BRC awareness refresher training. Training records define the course taken, name and role of employee, and the trainer. Records are signed off by both trainee and trainer.

Challenged at this Audit: 2017-GMW
Training records reviewed during the assessment as follows: -

1. S. Campbell – Hygiene refresher, housekeeping & cleaning, incoming goods, job sheets, equipment and machine training for Kiefel KMD60 carried out on 11/03/2017.
2. M. Madrzjewski– Good hygiene practices, housekeeping, process control and incoming goods/despatch carried out on 12/03/2017.
3. D. Campbell – Hygiene refresher, housekeeping & cleaning, incoming goods, job sheets, equipment training on 02/03/2017 and machine training for Kiefel KMD60 carried out on 10/03/2017.

6.2 Personal hygiene

System Validated: 08 & 09 May 2017
Personal hygiene is covered in the by procedure QP22 Issue 1, dated 12/11/2015. The company has a formal documented Jewellery Policy and allows one wedding band to be worn in production areas. Watches, bracelets or necklaces are not permitted. False nails, nail polish and any aftershave or perfume is not permitted. Hands must be washed every time any employee enters the Production area and each site has hand washing facilities adjacent to all entrance/exit doors. Documented procedures are in place for personal medicines.
No mobile phones are allowed in the Production Areas. Blue nitrile gloves are available as and when requested.
Cuts and grazes are covered with a blue plaster and issued via the First Aiders.

Challenged at this Audit: 2017-GMW
Personal Hygiene Policy Issue 1, dated 12/11/2015
Jewellery & Personal Belongings Policy Issue 1, dated 11/03/2016
Health Screening Questionnaire Issue 1, dated 09/12/2015
Hygiene rules throughout the duration of the audit were fully observed.

6.3 Staff facilities

System Validated: 08 & 09 May 2017
The company has provided adequate facilities that were observed in good order at the time of the assessment. The company has implemented controls to ensure that access to locker rooms meet the requirements of the standard. Locker rooms are clean and tidy & provide adequate segregation of work wear and personnel items with three suitably

sized lockers provided for all production employees. No evidence was found during the assessment of staff, eating, drinking or smoking in locker rooms.
The company has provided facilities which address the provision of hand washing and include warm water, unscented soap, suitable hand drying and advisory signs in all units. Hand washing facilities are available at the entrance to production areas. Toilet facilities were found to be maintained in a clean and hygienic condition in all units.

There is a staff canteen located on site on an upper mezzanine floor away from production which provides suitable amenities including chilled food storage facilities and a microwave. The canteen is clean and tidy and provides clearly marked waste containers. There are drinking water facilities in place in designated areas of production with the provision of conical cups. Drinks must be taken next to the fountain. Eating is strictly limited to the canteen. The site has an external smoking area with suitable facilities in place for the disposal of smokers' waste.

Challenged at this Audit: 2017-GMW
Canteen, toilets, locker areas and outside smoking area examined during the audit and all facilities were found to be compliant with the Standard during the site tour.

6.4	Medical screening

System Validated: 08 & 09 May 2017
All staff are required to complete a Heath Questionnaire upon employment. If any staff are feeling unwell they must report immediately to their Line Manager. Staff are sent home if necessary and are then subject to return-to-work protocols. All visitors and contractors are required to complete health questionnaire and which is checked by the host on entry.

Challenged at this Audit: 2017-GMW
Reception area has designated visitor sign-in and health questionnaire prior to entry to the site.
Practices in evidence at the site found to be compliant during the audit.

6.5	Protective clothing

System Validated: 08 & 09 May 2017
Protective clothing is worn across the site in accordance with procedure CP24 at issue 2, dated 23.03.16 Company issued protective garments that are suitable & sufficient are provided to employees. All company protective clothing is laundered by employees with written instructions and colour-coded laundry bags provided. Issues consist of jackets, polo-shirts, sweatshirts, trousers, safety shoes, safety glasses & disposable hair nets. Fleeces are not permitted to be worn in production areas. Beard snoods are provided if required. Clothing is permitted to be worn between departments but not off-site. Personnel change into and out of company clothing on site. The process is monitored for compliance by the Senior Management. Records kept of periodic swabbing to ensure compliance to self-care policy.

Challenged at this Audit: 2017-GMW
Self-Care Policy: Maintenance and Use of Workwear Issue 3, dated 15/02/2017
PPE was seen to be worn by all employees during the assessment.

Non-applicable clauses	