



Audit Report

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

Audit Result: Certificated

Audit Frequency : 12 months

Company Details	
BRC Site Code:	
Company Name : First Choice Labels Limited	
Site Name : Redcar	
Address : Units W1 & W2, Kirkleatham Business Park, Redcar	
Country : UK	Postcode : TS10 5SH
Telephone : 01642 777997	Fax : 0845 280 6162
Company Representative Name: Nigel Willis	
Email : info@firstchoicelabels.com	

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

B L Fowler

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Audit Start Date: 05-06-2009 **Audit Finish Date:** 05-06-2009
Re-audit Due Date : 21-05-2010 **Previous Audit Date:** 27-05-2008

Scope Details	
Packaging Category	2
Audit Level	2
Packaging Field 2	

Scope of Audit The manufacture of self adhesive labels for the food industry and other applications
Exclusions from Scope None
Products in production at the time of the audit Plain and decorated paper self adhesive labels

Key Personnel				
Name/Job Title	Present at Audit (x)			
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting

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Nigel Willis, Managing Director	X			X
Kirk Lamplugh, Sales Office Manager	X	X	X	X
Malcolm Hassall, Consultant	X	X	X	X

Company Profile

The company, founded in 2002 started its operations in smaller premises but the need for more production capacity to meet customer demand has necessitated the acquisition of the current premises, which are new and provide adequate facilities for the planned range of operations. A new six colour printer is operating to full capacity. Additional fully skilled and experienced operators have been recruited to ensure that the company has the capability to meet all customer requirements.

Equipment and the site facilities have been progressively improved to enhance product quality and productivity with excellent application of modern technology incorporated into new machinery and control systems to achieve products meeting customer requirements. The principal activity is the manufacturing and supply of labels (either plain or printed) on rolls and factored printers. The company has always focused on a local clientele to ensure rapid service and accessibility to discuss product application in the clients' environment. The owner, who has over 18 years experience of setting up customer labelling systems and resolving operational problems places great emphasis on partnership with the company's customers. First Choice has chosen probably the best die-cutter manufacturer in the United Kingdom to produce the press manufacturing cylinders, a large number in the most popular sizes being held in stock. This allows them to support their clients with competitive tooling costs and this also helps them provide fast turnaround in today's deadline driven market.

Continual investment in the latest computer hardware and software has enabled First Choice to keep up to date with ever-changing technology. New technology labelling systems are being developed in conjunction with a major, world-class customer

The standard of housekeeping is excellent, with a corresponding culture reflecting the application of hands-on management supported by the dedicated workforce. The fabric of the building is in excellent condition and the location is suitable for the production of food grade product.

Audit Duration Details

On-site audit duration 8.15 Man Hours

Duration of production facility audit 2 Man Hours

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Reasons for deviation from typical (12 hours) or expected on-site audit duration or
typical (3 hours) site inspection duration

Small company, well established IMSM

Audit Duration per day

	Start time	Finish time
Day 1	0845	1700
Day 2		

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NON-CONFORMITY SUMMARY SHEET

List of Non Conformities

Critical

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Revisit date	Reviewed by
		None			

Major

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Evidence provided Document Photograph Visit/Other	Reviewed by
		None			

Minor

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken	Evidence provided Document Photograph Visit/Other	Reviewed by
		None			

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Detailed Audit Report			
BRC Requirement No.	REQUIREMENT	Conforms	Details
		Y, N or N/A	
1	SENIOR MANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT		
Statement of Intent	The company's senior management shall demonstrate they are fully committed to the implementation of requirements of the Global Standard for Packaging. Opportunities for improvement shall be identified, implemented and fully documented.	Y	Senior Management's commitment is defined in the policy statement contained in the integrated manual. The manual contains appropriate statements and approved by the Managing Director, Nigel Willis . Dated 11 th March 2009.
1.1	The company's senior management shall provide the human and financial resources required to implement and improve the technical management systems.	Y	Management review held 12/05/2009 Agenda generally in line with the standard
1.2	The company shall have an organisation chart demonstrating the structure of the company.	Y	BS EN ISO 9000 – MS1 organisation chart (Form 3) defines structure. Job descriptions cover responsibilities
1.3	Clear communication and reporting channels shall be in place to report on and monitor compliance with the Standard.	Y	Manual defines responsibilities and the reporting chain in FCL Management structure MS1
1.4	The control of the system implementing the Standard shall rest with a suitably competent person (the designated manager).	Y	The Managing Director started this business in 2002 and is deemed competent.
1.5	The designated manager shall have a designated, suitably competent deputy to provide support and cover for absence.	Y	The Deputy is Kirk Lamplugh, many years experience in the industry
1.6	The company's senior management shall take responsibility for reviewing compliance with requirements of the Standard.	Y	Through the Management Review process and internal audits by consultant
1.7	The review process shall be undertaken at appropriate planned intervals, as a minimum annually, to ensure critical evaluation of the product safety and risk management system's suitability and effectiveness.	Y	Management Review annually covers the Hazard analysis
1.8	The review process shall include the evaluation of: <ul style="list-style-type: none"> • internal, second party and third party audits • previous management review documents and action plans • customer performance indicators, complaints and feedback • incidents, corrective actions, out-of-specification results and non-conforming materials • process performance and deviation from defined parameters • reviews of the hazard and risk management system • developments in scientific information associated with the products produced by the company • resource requirements. 	Y	Minutes of management review dated 12 th May 2009 cover this agenda. Action points allocated to individuals.
1.9	Records of management reviews and corrective action shall be comprehensively documented and retained.	Y	Minutes of previous management review held on PC back to 13/5/2005

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1.10	The company shall have a system in place to ensure that it is kept informed of relevant product safety issues pertinent to this category; legislative requirements, scientific and technical developments; and Industry Codes of Practice applicable in the country of production and, where known, the country where the product will be sold and/or ultimately used.	Y	Information from the customer base and the consultant – FSA, RSSL etc
1.11	The company shall ensure that the materials manufactured comply with the relevant legislation in the country which the products are sold and/or ultimately used, where known.	Y	Note is taken of the information in www.foodcontactmaterials.com .
1.12	The company shall have the current issue of the Global Standard for Packaging available.	Y	Have an up to date copy of the standard held on site.
1.13	The company's senior management shall ensure that non-conformities identified at the previous audit against the Standard are effectively actioned.	Y	None raised at last audit
2 HAZARD AND RISK MANAGEMENT SYSTEM			
Statement of Intent	A formal hazard and risk management system shall be in place to ensure that all hazards to product safety and integrity are identified and appropriate controls established.	Y	No CCP's for product integrity are listed – covered by PRP's
2.1 Hazard and Risk Management Team			
2.1.1	The hazard and risk management system shall have senior management commitment and shall be implemented through the company's documented management system.	Y	The systems are approved by the Managing Director
2.1.2	The hazard and risk management system shall be developed, reviewed and managed by a multidisciplinary team. In the event that the company does not have the appropriate expertise in-house, external expertise shall be sought and used to develop and review the hazard and risk management system. However, the day-to-day management shall remain the responsibility of the company.	Y	Developed by the team comprising the M/D, Consultant and Sales Office Manager Includes pre requisite programs.
2.1.3	The multidisciplinary team shall have a clearly identified leader who shall be suitably trained in hazard analysis and risk management techniques.	Y	The team ensure a full view of the overall process and employee ownership.
2.1.4	The team shall be suitably trained and kept up to date with factory changes and customer requirements as they occur.	Y	The consultant has many years experience in HACCP principles and is academically qualified in HACCP
2.2 Hazard and Risk Analysis			
2.2.1	The company shall establish and document the packaging category to be implemented using the packaging category determination decision tree.	Y	Customers require category 2 standards. Risk assessment methodologies, and decision tree have been used to determine category.

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2.2.2	The packaging category shall be verified through the hazard and risk management process.	Y	See above. Quantification and decision tree method used.
2.2.3	During a hazard and risk analysis the company shall take into consideration known and potential hazards and risks related to the process and raw materials. It shall include the warehouse or storage associated with the production processes.	Y	The HACCP is well expressed. All chemical, Physical Biological and Quality factors are considered and satisfactorily addressed. PRP's controlling product contamination are in place
2.2.4.	The hazard and risk analysis shall consider microbiological, foreign objects and chemical contamination, legality and defects critical to consumer safety as well as those hazards that may have an impact on the functional integrity and performance of the final product taking into account the customer requirements.	Y	The HACCP considered Chemical, physical and biological contamination as well as defects critical to product safety.
2.2.5	<p>The hazard and risk analysis shall be appropriately recorded and shall incorporate the following steps:</p> <p>2.2.5.1 A full description of the product, taking into account the intended use by the customer.</p> <p>2.2.5.2 Establish a precise, validated plan of process flow(s).</p> <p>2.2.5.3 Identify and record hazards associated with possible failure at each process step and the controls required.</p> <p>2.2.5.4 Assess the risk level for each hazard based on the likelihood of the occurrence and the severity of the outcome.</p> <p>2.2.5.5 Identify those process steps which are critical to the safety and quality of the final product.</p> <p>2.2.5.6 Confirm and implement the control and monitoring procedures including clearly defined limits appropriate to the level of risk.</p> <p>2.2.5.7 Establish the corrective action to be taken when monitoring indicates a loss of control.</p> <p>2.2.5.8 Establish the documentation for all the procedures and records necessary to maintain process control.</p> <p>2.2.5.9 The monitoring and controls required by the hazard and risk analysis shall be regularly reviewed, verified and validated to ensure they are up to date and functioning effectively.</p>	Y	<ol style="list-style-type: none"> 1. In the management review 2. Starts at customer enquiry to establish customer need, 3. Detailed in flow chart 4. Low/Medium/High for each hazard 5. No CCP's identified. 6. Limits are determined mainly by colour matching, samples are always available for reference. 7. Quality system defines quarantine and rewind or scrap 8. Well-documented and controlled systems in place. 9. The HACCP is reviewed annually.

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2.2.6	Procedures relating to the monitoring of critical process steps shall be included in internal audits against the Standard (refer to clause 3.4).	Y	Internal audit plans have made provision for HACCP PRP auditing as part of the Integrated Quality System. Ref audit on 15.04.09 against every line of the version 3 standard.
2.2.7	Review of the hazard and risk management system shall be carried out at least once per year or when any process changes.	Y	See above at management review.
2.2.8	Upon a request in writing from a customer, the company shall conduct a supplementary hazard and risk analysis specific to use of a product of the company that is outside the promoted range of uses. This shall be specific to that use and for that customer only and shall be considered exceptional.	Y	Not required, no customer has ever requested this.

2.3 Hazard and Risk Management Prerequisites

2.3.1	A hazard and risk analysis shall be fully supported by the implementation of the prerequisite requirements set out in requirements clauses 4 to 6. The hazard and risk analysis may indicate that some of these requirements are not applicable. These shall be documented and regarded as proposed exemptions for review at audit. Acceptance or rejection of the proposed exemptions shall be recorded in the auditor's report.	Y	See above, pre requisites in place and functioning well..
2.3.2	The company shall keep recorded exemptions to the Standard under review and provide documented evidence of this review at subsequent audit.	Y	No exemptions defined.

3.0 TECHNICAL MANAGEMENT SYSTEM

3.1 Technical Management Policy

3.1	The company's senior management shall develop and document the company's quality and hygiene policy ensuring it is authorised, reviewed, signed and dated by an appropriate senior manager and implemented.	Y	Compliant, Safe and Legal product
3.1.1	The policy shall state the company's intention to meet its obligations to produce safe and legal products and to meet customer requirements.	Y	It is a very well crafted policy
3.1.2	The policy shall be understood by all supervisory and relevant personnel and implemented accordingly.	Y	Published on notice boards and manual.
3.1.3	The policy shall be communicated throughout the company and regularly reviewed.	Y	See above

3.2 Quality Manual

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3.2	The company shall have a manual that states its commitment to quality and hygiene and plans its effective implementation.	Y	Manual in place and signed by the Managing Director
Statement of Intent			
3.2.1	The manual shall have a scope which covers the requirements of this Standard and shall be maintained as an essential element of demonstrating compliance with this Standard.	Y	Scope is relevant to the company's product range
3.3 Customer Focus and Contract Review			
3.3	The company's senior management shall ensure that processes are in place to determine customer needs and expectations and ensure these are fulfilled.	Y	The company management have reviewed all company practices and procedures.
Statement of Intent			
3.3.1	The company shall clearly identify those individuals responsible for communication with customers and shall have an effective system for communication.	Y	Communications with customers are driven through the Sales Office Manager and M/D
3.3.2	Customer needs and requirements shall be reviewed on a suitable predetermined frequency. Any changes to existing agreements or contracts shall be agreed, documented and communicated to appropriate departments.	Y	Frequent customer liaison through sales order negotiations.
3.4 Internal Audits			
3.4	The company shall audit those systems and procedures which cover the requirements of the Global Standard for Packaging to ensure they are in place, appropriate and complied with.	Y	Audits are planned for 2009 implemented to date last in April 2009
Statement of Intent			
3.4.1	An internal audit procedure shall be documented and shall specify the scope and frequency of audits which shall be established in relation to the risks associated with the activity. Audits shall be carried out by nominated, appropriately trained personnel who shall be independent of the activity being audited.	Y	Audit training done by Consultant.
3.4.2	Deficiencies and details of non-conformities shall be notified to appropriate supervisory staff and corrective action implemented within a specified and appropriate time period. This shall be documented.	Y	P 4, 5 and 6 Control of Nonconforming Product and Corrective and Preventive action
3.4.3	The management shall review a summary of audits and ensure corrective action has been taken.	Y	This is part of the annual Management System review.
3.4.4	Records of internal audits shall be maintained to ensure that conformity as well as non-conformity can be clearly identified and verified.	Y	Evidence of audits of PRP's on 15.04.09 audit of sections 4, 5 and 6 of the standard.
3.5 Supplier Monitoring			The performance, quality and service of materials and their suppliers are continually monitored.

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3.5	The company shall operate procedures for approval and monitoring of its suppliers. This shall include suppliers of materials and services to the company where appropriate to this Standard.	Y	Suppliers are few. This is a simple process; changes are usually due to customer demand for new materials and price.
Statement of Intent			
3.5.1	The company shall have a documented supplier approval procedure and continual assessment programme in place, based upon hazard and risk analysis.	Y	All supplier assessment records are in place.
3.5.2	Records of any results of supplier assessment and any necessary actions shall be maintained.	Y	Papers are provided by Fasson, Scanstik, Raflatac
3.5.3	As part of hazard and risk analysis, and where appropriate, suppliers of packaging materials shall either be certified to this Global Standard for Packaging or the company shall be responsible for ensuring their suppliers are undertaking adequate technical practices which are maintained, audited and documented.	Y	See above- PSMA members will not get BRC certification by policy
3.6 Subcontracting of Production			
3.6	Procedures shall be in place for the effective control of subcontractors.	Y	No subcontractors used.
Statement of Intent			
3.6.1	Where any production processes are subcontracted, the risks to the product from this process shall form part of the hazard and risk analysis.	Y	N/A see above
3.6.2	The company shall carry out a hazard and risk analysis to establish whether any subcontractor should be certified to this Standard.	Y	N/A see above
3.7 Documentation Control			
3.7	The company shall ensure that documented procedures are established and maintained to control all documents.	Y	Documents are well managed. They are contained in master manual on PC and are completely adequate.
Statement of Intent			
3.7.1	All documents in use shall be properly authorised and be the current version.	Y	Authorised by the M/D, last change December 2008
3.7.2	Documents shall be clearly legible, unambiguous and sufficiently detailed to enable their correct application by appropriate personnel and shall be readily accessible at all times.	Y	Clean and unambiguous. They are basically work instructions and specifications combined in an Excel spreadsheet. A simple but highly effective system.
3.7.3	All changes and amendments to documents critical to product safety, legality or quality system procedures shall be recorded.	Y	All recorded

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3.7.4	A procedure shall be in place to ensure obsolete documentation is rescinded and, if appropriate, replaced with a revised version.	Y	All documents up to date and well archived.
3.7.5	Documentation and records shall be retained as defined within the company quality manual, and the period of record retention shall be appropriate to the usable life of the packaging in recognition of the customer requirements.	Y	Quality records will be kept for a minimal period of three years depending on P 01 of QM.
3.8 Specifications			
3.8	The company shall ensure that appropriate specifications exist for raw materials, intermediate and finished products and any product or service which could affect the integrity of the finished product and customer requirements.	Y	Specifications are available via the suppliers' websites.
3.8.1	Specifications shall be adequate, accurate and shall ensure compliance with relevant product safety and legislative requirements.	Y	The products this company make are very simple and they are subject to the usual due diligence regulations as Regulation 2004/1935 EC
3.8.2	Specifications shall, where appropriate, be formally agreed with relevant parties.	Y	This and artwork is determined during the contract review stages with customers
3.8.3	Specifications shall be maintained, which ensure that components or articles used shall be suitable for intended use.	Y	Specifications are defined e g Jacomelli Ice Cream JAC 004 – Plain colour wash
3.8.4	Trademarks for application on packaging materials shall, where appropriate, be formally agreed between relevant parties.	Y	Agreed during the contract review stages and supplied as a proof for approval
3.8.5	The company shall operate a specification review procedure.	Y	Reviews between Sales and Customers done for each order
3.9 Record Keeping			
3.9	The company shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.	Y	All records are up to date and are appropriately archived on completion.

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3.9.1	<p>Records shall be maintained in order to demonstrate that technical and hygiene procedures have been followed. Records shall include as a minimum, the following:</p> <ul style="list-style-type: none"> • Hazard and risk management plan and verification • Records supporting product compliance and suitability for food/cosmetics/toiletries use • Management review • Training • Internal auditing • Traceability • Supplier monitoring • Results of any product analysis • Cleaning schedules and cleaning records • Instances of foreign-body contamination • Receipt and investigation of customer complaints • Pest control reports and records • Maintenance and engineering work • Control of glass and brittle plastics • Control of blades and sharp objects • Product recall – test and actual • Non-conforming goods • Calibration of equipment. 	Y	<p>Records examined for: Hazard and risk management, records supporting product compliance, Management review, training, internal auditing, supplier monitoring Cleaning schedules and cleaning records. Instances of foreign-body contamination Receipt and investigation of customer complaints, pest control reports and records Maintenance and engineering work, control of glass and brittle plastics Control of blades and sharp objects, Product recall – test Non-conforming goods. The above list is not exhaustive.</p>
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3.10 Traceability

3.10 Statement of Intent	The company shall have a system in place to trace materials through all stages, including purchasing, processing and distribution of the finished product to the customer.	Y	Traceability is fully functioning using peel-off labels from the master reel stuck onto the Job Sheet.
3.10.1	The company shall ensure that its suppliers have appropriate traceability systems in place to comply with relevant legislation in the country of intended use where known.	Y	There are no BRC registered suppliers of label substrates.
3.10.2	The company shall have a system which has the ability to trace and follow all raw materials from source through all stages of processing and distribution of the finished product	Y	See above statement of intent.
3.10.3	An appropriate system shall be in place to ensure the customer can identify a product for the purposes of traceability.	Y	Identification is through labels on boxes of finished product through job number and record of date of despatch
3.10.4	The system shall be tested to ensure traceability can be determined from raw material to finished product and vice versa. This shall take place on a predetermined frequency, at least on an annual basis, and results retained for inspection.	Y	Traceability system is periodically tested during audits

3.11 Complaint Handling

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3.11	The company shall have a system for the effective capture, recording and management of product complaints.	Y	The NCR system identifies and includes customer complaints..
3.11.1	All complaints shall be recorded, investigated and the results of the investigation documented.	Y	See above. Only three complaints 2008
3.11.2	Complaint data shall be analysed on a predetermined frequency to identify trends and used to implement ongoing improvements.	Y	Analysed continually.
3.11.3	A corrective action plan shall be approved by a designated manager who shall ensure that such action is fully implemented and is effective in preventing a recurrence.	Y	This is always co-ordinated by the Sales Office Manager for management team
3.12 Management of Incidents and Product Recalls			
3.12	The company shall have a plan and systems in place to effectively manage incidents in order to ensure that all potential risks to the quality and hygiene of products are controlled.	Y	Incident report procedure in place and utilised.
3.12.1	The company shall provide written guidance to relevant staff regarding the type of event that would constitute an incident and a documented incident reporting procedure shall be in place.	Y	Procedures are well written, employees are trained to them
3.12.2	An effective documented Product Recall procedure shall be in place and shall be tested on a predetermined frequency and the results retained for inspection.	Y	FCL/ RCL 1 Product recall system tested 6 th May 2009 with Ampersand – Keith Anderson
3.12.3	The recall procedure shall be capable of being operated at any time and will take into account notification to the supply chain, stock return, logistics for recovery, storage of recovered product and disposal. Arrangements for notifying relevant stakeholders within a specified time frame shall be defined within the procedure (e.g. contact details).	Y	The product recall system operates whenever the company is open
3.12.4	A nominated manager shall be responsible for ensuring that preventive action is taken based on a review of incidents.	Y	Kirk Lamplugh
4.0 SITE STANDARDS			
4.1 Perimeter and Grounds			
4.1	All grounds within the site shall be finished and maintained to an appropriate standard.	Y	The area was examined during the site tour and found to be acceptable

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4.1.1	The external area shall be kept in good order and free from litter.	Y	The area was examined during the site tour and found to be acceptable
4.1.2	Where possible, a clean and unobstructed area shall be provided along the external walls of the building used for production and/or storage.	Y	Examined during the site tour and found to be acceptable
4.1.4	External silos, pipe work or other access points for product and/or raw materials shall be appropriately sealed to prevent pest entry, ingress of water and other contaminants.	Y	Examined during the site tour and found to be acceptable
4.1.5	External drains shall be properly protected to prevent entry of pests.	Y	Examined during the site tour and found to be acceptable
4.1.6	Where natural drainage is inadequate, external drainage shall be installed.	Y	No materials stored externally.
4.1.8	Where external storage of raw materials is necessary these shall be protected from contamination.	Y	Examined during the site tour and found to be acceptable
4.1.9	External storage of refuse shall be in designated areas. Refuse shall be removed at appropriate intervals.	Y	Examined during the site tour and found to be acceptable

4.2 Security

4.2 Statement of Intent	Security shall be maintained to prevent access of unauthorised persons to production and storage areas.	Y	Examined during the site tour and found to be acceptable
4.2.1	All personnel including visitors and contractors shall only enter any part of the site through designated entrances.	Y	Examined during the site tour and found to be acceptable
4.2.2	Security shall be maintained to prevent the entry of unauthorised persons to the premises.	Y	Examined during the site tour and found to be acceptable
4.2.3	Based on hazard and risk analysis, procedures shall be in place to ensure the secure storage of raw materials, intermediate and finished products.	Y	Examined during the site tour and found to be acceptable

4.3 Layout and Product Flow

4.3 Statement of Intent	Premises and plant shall be logically designed, constructed and maintained to control the risk of product contamination.	Y	Examined during the site tour and found to be acceptable
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4.3.1	Process flow shall be maintained to prevent cross-contamination or damage to the product.	Y	Examined during the site tour and found to be acceptable
4.3.2	Work in progress shall be identified clearly and adequately protected.	Y	Examined during the site tour and found to be acceptable
4.3.3	Sorting or other activities involving the direct handling of product shall take place in areas that have, as a minimum, the same standards as production areas.	Y	Examined during the site tour and found to be acceptable
4.3.4	Customer returns shall not, where possible, enter finished goods areas without hygiene inspection and positive release. Activities that could produce a contamination risk, such as the removal of outer packaging, shall be carried out in a designated, segregated area.	Y	Quarantine area established. Products may only be released following Management investigation.
4.3.5	Entry into production areas shall be via properly designated entry routes and access points.	Y	Examined during the site tour and found to be acceptable
4.4	Building Fabric Raw Material Handling, Preparation, Processing and Storage Areas		
4.4 Statement of Intent	The fabric of the site, buildings and facilities shall be suitable for the intended purpose.	Y	Examined during the site tour and found to be acceptable
4.4.1	External walls shall be well maintained and of sound construction.	Y	Examined during the site tour and found to be acceptable
4.4.2	Where suspended ceilings exist they shall be accessible for inspection and cleaning where required.	Y	Examined during the site tour and found to be acceptable
4.4.3	Suitable and sufficient lighting shall be provided for a safe working environment, correct operation of processes, effective inspection of product and cleaning.	Y	Examined during the site tour and found to be acceptable
4.4.4	Walls, floors, ceilings and pipe work shall be maintained in good condition and shall be capable of being kept clean.	Y	Examined during the site tour and found to be acceptable. Crack along wall floor junction at rear wall appears to be long established.
4.4.6	All internal drain openings shall be suitably protected against the entry of pests and odour.	Y	Examined during the site tour and found to be acceptable
4.4.7	Suitable and sufficient ventilation shall be provided.	Y	Examined during the site tour and found to be acceptable

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4.5 Maintenance of Plant and Equipment			
4.5	Statement of Intent	Y	
	Equipment shall be designed for the intended purpose and adequately maintained to minimise the risk of product contamination.	Y	Examined during the site tour and found to be acceptable
4.5.2	Equipment, including fixtures and fittings, shall be maintained to minimise the risk of product contamination.	Y	Examined during the site tour and found to be acceptable
4.5.3	Wooden equipment including desks, chairs, tables, etc. shall be kept clean, in good condition and free from splinters or other sources of physical contamination.	Y	Examined during the site tour and found to be acceptable
4.5.5	Compressed air that comes into contact with the product shall be filtered and the equipment maintained to prevent contamination.	Y	No air directly onto the web
4.5.6	Temporary engineering and modifications using adhesive tape, cardboard or similar materials shall not be permitted, except in emergencies.	Y	None observed on the shop floor. Recorded on Cleaning record if present
4.5.7	When temporary modifications are made these shall be subject to a time limit and shall be recorded and scheduled for correction.	Y	See above, none evident.
4.5.8	Persons undertaking maintenance activities shall comply with site hygiene requirements, including those relating specifically to protective clothing, hand washing and personal hygiene.	Y	Operators do basic maintenance. Specialist repairs are done by Manufacturers or specialist contractor
4.5.9	Contractors involved in maintenance or repair activities shall be under the supervision of a nominated person.	Y	Nigel Willis
4.5.10	On completion of any maintenance work, machinery and equipment shall be clean and free from contamination hazards.	Y	Examined during the site tour and found to be acceptable
4.6 Staff Facilities			
4.6	Statement of Intent	Y	
	Staff facilities shall be sufficient to accommodate the required number of personnel, and designed and operated to minimise the risk of product contamination. Such facilities shall be kept in a good and clean condition.	Y	Examined during the site tour and found to be acceptable
4.6.2	Toilets shall be provided with hand-washing facilities comprising basins with soap and water available at a suitable temperature with adequate hand-drying facilities and waste containers, as necessary.	Y	Examined during the site tour and found to be acceptable; wash-hands signs in lavatories
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4.6.3	Advisory signs shall be in place to prompt hand washing where required.	Y	Examined during the site tour and found to be acceptable
4.6.4	All equipment and surfaces in rest facilities shall be clean, well maintained and of suitable construction.	Y	Examined during the site tour and found to be acceptable
4.6.5	Lockers shall be provided for all personnel who work in raw material handling, processing, preparation, packing and storage areas. Lockers shall be of sufficient size to accommodate all reasonable personal items.	Y	Examined during the site tour and found to be acceptable
4.6.7	Eating, drinking and smoking shall not be allowed in locker and changing rooms.	Y	Examined during the site tour and found to be acceptable
4.6.8	Facilities for visitors and contractors shall enable compliance with the company's hygiene policy.	Y	Satisfactory arrangements and PPE in place
4.6.10	All food brought into manufacturing premises shall be held in sealed containers, in an appropriate area which shall be kept in a clean and hygienic state.	Y	Thermometer for fridge temperature records. 6 degrees Celsius today
4.6.11	Designated controlled smoking areas shall be isolated from production areas to an extent that ensures smoke cannot reach the product. Where smoking is allowed under national law, sufficient extraction to the exterior of the building shall be ensured. Adequate arrangements for dealing with smokers' waste shall also be provided at smoking facilities, both inside buildings and at external locations. Facilities shall be available, with adequate reminders, for hand washing after smoking.	Y	No smoking at all on site.
4.6.12	Canteen and food waste shall be stored in suitably lined and lidded containers.	Y	Examined during the site tour and found to be acceptable

4.7 Housekeeping and Cleaning

4.7 Statement of Intent	Housekeeping and cleaning systems shall be in place which ensure that appropriate standards of hygiene are maintained and that risk of contamination to the product is minimised.	Y	The site is very clean and tidy. Appropriate controls are in place and are monitored.
4.7.1	Good standards of housekeeping shall be maintained which shall include a 'clean as you go' policy.	Y	See above.
4.7.2	All internal surfaces of the building shall be kept free from excessive dust, dirt and cobwebs.	Y	Examined during the site tour and found to be acceptable
4.7.3	Where possible, an adequate gap shall be provided around the internal perimeter to facilitate cleaning and inspection.	Y	Examined during the site tour and found to be acceptable

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4.7.4	All internal surfaces of buildings, equipment and vehicles shall be subject to documented scheduled cleaning, which shall cover all areas of the site with particular reference to production and storage areas. Cleaning schedules shall include the following information: <ul style="list-style-type: none"> responsibility for cleaning item/area to be cleaned frequency of cleaning method of cleaning cleaning materials to be used cleaning record checks. 	Y	All surfaces, equipment and vehicles are subject to documented cleaning recorded on the cleaning records weekly.
4.7.5	Tools and other maintenance equipment shall be cleared away after use and appropriately stored.	Y	This is documented in production records.
4.7.6	Cleaning equipment and materials shall be kept in a designated location.	Y	Yes, locked away when not in use.
4.7.7	Workstations shall be kept in good order and potential physical contamination hazards properly controlled.	Y	Examined during housekeeping audits e g 15/04/2009 and monthly housekeeping audits.
4.7.8	Cleaning chemicals shall be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers' instructions.	Y	Examined during the site tour and found to be acceptable
4.7.9	Chemicals that are strongly scented or could give rise to taint and odour contamination shall not be used.	Y	Examined during the site tour and found to be acceptable
4.7.10	Materials and equipment used for cleaning toilets shall be segregated from those used elsewhere.	Y	Stored separately. Examined during the site tour and found acceptable

4.8 Waste and Waste Disposal

4.8 Statement of Intent	Suitable facilities shall be provided for the storage and disposal of process and other waste.	Y	Examined during the site tour and found to be acceptable
4.8.1	Suitable and sufficient refuse and waste containers shall be provided which shall be emptied at appropriate frequencies and maintained in an adequately clean condition.	Y	Examined during the site tour and found to be acceptable
4.8.2	Waste containers shall be suitably labelled or marked.	Y	Examined during the site tour and found to be acceptable
4.8.3	Where agreed with the customer, suitable and sufficient containers shall be provided for collection of substandard trademarked materials. Where agreed, such materials shall be rendered unusable through a destructive process. All materials disposed of shall be recorded.	Y	All sub standard goods are destroyed by recycling.

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4.8.4	If substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be a specialist in appropriate waste disposal and shall provide records of material destruction.	Y	Examined during the site tour and found to be acceptable
4.8.5	The company shall ensure that third-party waste disposal contractors are licensed in accordance with the requirements of local law.	Y	SITA and local council remove waste and are Licensed Waste Carriers.
4.9 Pest Control			
4.9 Statement of Intent	The company shall be responsible for minimising the risk of pest infestation on the site.	Y	Precision Pest Control. BPCA member M15/515 to March 2008: 4 routine visits per annum.
4.9.1	A preventive pest control programme shall be maintained at manufacturing, storage and transport facilities under the company's control.	Y	Program covers rodents and crawling insects
4.9.2	Unless competent in-house expertise exists, a competent pest control company shall be contracted. The company shall ensure, by regular audit that the system is fully implemented by the contractor and is effective.	Y	Two baits not dated on 6 th May 2009. Company have identified the shortfall and dealt with the supplier.
4.9.3	The frequency of inspections shall be determined by hazard and risk analysis. Pest control staff shall be suitably trained to carry out inspection and control.	Y	Every 12 weeks.
4.9.4	Effective precautions shall be in place to prevent pests entering the premises. The building shall be suitably proofed against the entry of all pests via doors, windows, ducts and cable entry points.	Y	Examined during the site tour and found to be acceptable. Gap under door sealed
4.9.5	An up-to-date site plan shall indicate positions of baiting points and flying insect control devices. These shall not be positioned in areas where dead insects can contaminate packaging materials. If there is a danger of insects being expelled from any extermination device and contaminating the product, alternative systems and equipment shall be used.	Y	Examined during the site tour and found to be acceptable
4.9.6	In the event of infestation, immediate action shall be taken to eliminate the hazard. Action shall be taken to identify, evaluate the potential for contamination or damage and authorise the release of any product potentially affected.	Y	Examined during the site tour and found to be acceptable
4.9.8	It shall be the responsibility of the company to ensure all the relevant recommendations made by the contractor or in-house expert are implemented in a timely manner and monitored for effectiveness.	Y	Recommendations made by contractor ; site is well secured.
4.9.9	Written procedures and activity documentation shall be maintained.	Y	Examined in Hygiene Manual and Pest manual and found to be acceptable

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4.10 Transport, Storage and Distribution			
4.10	The transport, storage and distribution of raw materials and finished products shall be undertaken in a manner to minimise the risk of contamination.	Y	Company's own vehicles are used..
4.10.1	All finished products and materials transferred between premises, shall be protected during transit and storage by appropriate external packaging or transported under conditions to protect product from contamination, including taint or odour.	Y	Products are not transferred between premises – two adjacent units
4.10.2	All pallets shall be checked. Damaged, contaminated or unacceptable pallets shall be discarded.	Y	Inspected and rejected if found to be unsuitable.
4.10.3	Vehicle drivers shall comply with the site rules relevant to this Standard.	Y	Drivers are company employees and obey all of the rules
4.10.4	All vehicles used for deliveries shall be kept clean and in a condition to minimise the risk of product contamination.	Y	Checked on cleaning schedules
4.10.6	All delivery vehicles and shipping containers shall be subject to a hygiene-checking procedure before loading.	Y	As above.
4.10.7	Storage, including off-site storage, shall be controlled to protect product from contamination including taint or odour. Where off-site storage is used the same requirements apply as for on-site storage.	Y	Segregation in warehouse on racks.
5.0 PRODUCT AND PROCESS CONTROL			
5.1 Product Design and Development			
5.1	Product design and development processes shall be in place to ensure the production of safe products to defined quality parameters.	Y	Satisfactory. Contract review and quotation records the application by the customer where known
5.1.1	Where appropriate, customer design requirements shall be defined and agreed prior to undertaking product design.	Y	As above
5.1.2	Where appropriate, a process shall be in place to ensure final product concepts or art work are formally accepted by the specifier.	Y	Proof approved by customer before press.

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5.1.3	The company shall ensure that the product design processes, procedures and records of design together result in the development of specifications for each manufacturing process step to ensure the production of safe and legal products of the prescribed quality.	Y	Standard print and rewind process
5.1.4	Samples agreed with the specifier shall be retained for future reference.	Y	Retained in job sheet
5.2 Process Control			
5.2	Procedures shall be in place to ensure effective control of operations throughout the process.	Y	Work instructions are included in specifications.
Statement of Intent			
5.2.1	The company shall operate procedures that verify that the processes and equipment used are capable of producing safe and legal products to the prescribed quality within the process specification as defined by the hazard and risk management process.	Y	Dies control product size. Colour is calibrated by Pantone and densitometer.. Quality is determined by functionality and visual appearance.
5.2.2	Based on hazard and risk analysis, procedures for monitoring incoming materials shall be specified and documented. Suppliers of incoming materials, as appropriate, shall provide evidence of conformity.	Y	All goods inward checked as per procedure Section 11 of IQM
5.2.3	In order to prevent contamination, procedures shall be in place to appropriately segregate raw materials, intermediate and finished products.	Y	All stages of manufacturing are segregated.
5.2.4	Material intended for recycling shall be appropriately protected against contamination hazards.	Y	Material disposed of by SITA
5.2.5	In the event of changes to product formulation, processing methods or equipment, the company shall, where appropriate, re-establish process characteristics and validate product data to ensure product safety, legality and quality is achieved.	Y	Plates are renewed and proofing is re-established..
5.2.6	Non-conforming materials or customer-returned product shall be subject to inspection and positive release before any alternative use.	Y	There are no alternative used, rejects can only be inspected and defects scrapped.
5.3 Product Inspection and Analysis			
5.3	The company shall use appropriate procedures and facilities when undertaking or subcontracting inspection and analyses critical to product safety, legality and quality.	Y	Standard industry methods are used for the various products.
Statement of Intent			

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5.3.1	Quality checks shall be carried out to demonstrate that the product is within the tolerances laid down in the agreed product specification.	Y	Checks undertaken continuously as defined by the Job instructions in the work sheet.
5.3.2	Procedures shall be in place to ensure the reliability of test results.	Y	Process controls for product integrity. Production Procedures 18
5.3.3	Personnel undertaking analyses shall be suitably qualified and/or trained and shall be competent to carry out the analyses required.	Y	Satisfactory.
5.3.4	Frequency of checks shall be in accordance with industry-accepted practice based on hazard and risk analysis.	Y	Checks per Work sheet.
5.3.5	Where the company undertakes or subcontracts analyses critical to product safety or legal compositional verification to a laboratory, the laboratory shall use agreed and documented test methods and sampling procedures.	Y	Not applicable, no work is subcontracted.
5.3.6	Subcontracted laboratories, as appropriate, shall be independently accredited by a recognised or agreed competent body.	Y	Use paper or ink suppliers' laboratories for testing if problems identified.

5.4 In-line Testing Equipment

5.4 Statement of Intent	The company shall use hazard and risk analysis principles to determine the need for in-line product testing equipment to ensure the integrity and quality of products.	Y	No in-line tests, apart from visual
5.4.1.	The accuracy of measurement of in-line equipment shall be specified having due regard to the product parameter being controlled.	Y	Not precision manufacturing. Fit for purpose meeting colour standards.
5.4.2	The company shall establish and implement procedures for the operation, routine monitoring and testing of equipment. This shall include: <ul style="list-style-type: none"> • frequency and sensitivity of checks • authorisation of trained personnel to carry out specified tasks • documentation of test results. 	Y	Densitometer is checked with calibrated white tile but essentially used as a comparator against the customer approved proof.
5.4.3	In-line testing equipment critical to product integrity or safety shall incorporate a system to identify and, where appropriate, divert non-conforming product out of the product flow.	Y	No in line testing equipment
5.4.4	The company shall establish and implement corrective action and reporting procedures in the event of the monitoring and testing procedure identifying any failure of the in-line test equipment. Any such failures shall be subject to an assessment of potential risk and subsequent action may include a combination of isolation, quarantine and re-inspection of products produced since the last acceptance test of the equipment.	Y	Full Quarantine processes in place.

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5.5 Calibration			
5.5	Statement of Intent	Measuring equipment used to monitor critical manufacturing process points and product safety and legality shall be calibrated to a recognised national standard.	Y None used
5.5.1		Measuring equipment used to monitor critical manufacturing process points and the product's compliance with relevant legal requirements and specifications, shall be identified and calibrated. Where possible, this shall be traceable to a recognised national standard.	Y Pantone swatches checked annually against retained standard..
5.5.2		Where a traceable calibration is not possible, the company shall demonstrate the basis by which standardisation is carried out.	Y Pantones are a guide to colour for mixing, the white tile is produced by the densitometer maker.
5.5.3		All identified measuring equipment shall be checked and adjusted at a predetermined frequency, based on hazard and risk analysis. This shall be carried out by trained staff to a defined method to ensure accuracy within defined parameters.	Y See above
5.5.4		The identified measuring equipment shall be marked in accordance with calibration requirements.	Y See above
5.5.5		The identified measuring equipment shall be prevented from adjustment by unauthorised staff and shall be protected from damage, deterioration and misuse.	Y See above
5.5.6		Results and any actions taken when measuring equipment is found to be operating outside the specified limits shall be documented.	Y See above
5.6 Control of Non-conforming Product			
5.6	Statement of Intent	The company shall ensure that out-of-specification product is clearly identified, labelled and quarantined.	Y Reject product is promptly identified and is processed/scrapped very soon after.
5.6.1		Clear procedures for the control of out-of-specification, non-conforming materials shall be in place and understood by all authorised personnel. This may include rejection, acceptance by concession or authorisation for an alternative use.	Y See above. Reject product is promptly identified and is processed very soon after. Materials are only released by Managers.
5.6.2		Corrective actions shall be implemented to avoid recurrence of the non-conformance. Actions taken shall be documented.	Y The Company records and monitors corrective actions.
5.7 Foreign Body Control			

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5.7	All practicable steps shall be taken to identify, avoid, eliminate or minimise the risk of foreign body contamination.	Y	PRP's in place to prevent Contamination, checked with housekeeping audits.
Statement of Intent			
5.7.1	Training shall be given to all relevant staff in the avoidance and detection of foreign bodies.	Y	Hygiene training records have been completed per training records detailed in Management review
5.7.2	A written policy and documented controls shall be in place for: <ul style="list-style-type: none"> • non-production glass • brittle plastics • all materials used in the construction, fixture and fittings of the production area which could be confused with packaging material. 	Y	Contained in IMS manual - GLASS 1 and GLASS 2
5.7.3	There shall be no unnecessary non-production glass or brittle plastic which may pose a risk of contamination. Necessary glass and brittle plastic shall be maintained in good condition and protected, where possible, against breakage.	Y	Examined during the site tour and found to be acceptable
5.7.4	Based on hazard and risk analysis and where they constitute a risk of glass contamination, all bulbs and strip lights, including those on flying insect control devices shall be protected.	Y	Fluorescent in diffusers
5.7.6	Where damage occurs that poses a risk of contamination, a responsible person shall be placed in charge of the clean-up operation and ensure that no other area is allowed to become contaminated due to the breakage.	Y	Detailed in glass breakage procedure
5.7.7	Any product that has become contaminated shall be segregated and disposed of. A relevant quarantine procedure shall apply after any incident.	Y	Examined during the site tour and found to be acceptable
5.7.8	All breakages that pose a risk of product contamination shall be recorded in an incident report.	Y	None broken
5.7.9	There shall be a documented policy for the control of the use of sharps.	Y	Examined during the site tour and found to be acceptable
5.7.10	Sharp blades, equipment and tools shall not be left in a position that allows them to contaminate the product.	Y	Examined during the site tour and found to be acceptable
5.7.11	Sharp cutting instruments used in the manufacture of packaging materials shall be controlled to prevent product contamination. This shall include control into and out of the factory where they shall be disposed of in a sealable container when no longer usable.	Y	Examined during the site tour and found to be acceptable
5.7.12	Snap-off blade knives shall not be used.	Y	None observed during tour of site.

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5.7.13	Where open notice boards are present, loose fastenings such as drawing pins and staples shall not be used.	Y	Examined during the site tour and found to be acceptable
5.7.14	Notices on equipment shall be cleanable and secure.	Y	Examined during the site tour and found to be acceptable
5.8 Chemical and Biological Control			
5.8	Controls shall be in place to prevent contamination from chemical or biological hazard.	Y	Examined during the site tour and found to be acceptable
5.8.1	Chemicals including cleaning materials, lubricants and adhesives shall be of the appropriate grade and be suitably controlled to prevent contamination of the product.	Y	Examined during the site tour and found to be acceptable
6.0 Personnel Raw Material Handling, Preparation, Processing, Packing and Storage Areas			
6.1 Training			
6.1	The company shall ensure that all employees are adequately trained, instructed and supervised commensurate with their activity.	Y	Training is done by Peter Harris
6.1.1	All personnel, including temporary personnel, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period. Induction training shall include the company hygiene rules.	Y	Induction records for all staff
6.1.2	The company shall routinely review the competencies of staff and provide relevant training as appropriate. This shall cover all packaging quality assurance, potential contamination and safety hazards, including those specific to established critical process steps.	Y	Training has been done.
6.1.3	Records of training shall be kept for all current and recent key employees.	Y	All employees have training records.
6.1.4	A programme of refresher training shall be in place.	Y	See above.

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6.2 Access and Movement of Personnel			
6.2	The company shall ensure that access and movement of personnel, visitors and contractors shall not compromise standards of product quality.	Y	Small site, defined walkways
Statement of Intent			
6.2.1	If it is necessary to allow access through production areas, designated walkways shall be provided that ensure there is adequate segregation from materials.	Y	Examined during the site tour and found to be acceptable
6.2.2	All facilities shall be designed and positioned, where possible, so that movement of personnel is by simple, logical routes.	Y	Examined during the site tour and found to be acceptable
6.2.3	Contractors and visitors including drivers shall be made aware of all procedures for the premises and the requirements of the areas they are visiting with special reference to hazards and potential product contamination.	Y	Visitors sign in at reception. Comprehensive rules on sign-in sheet
6.3 Personal Hygiene			
6.3	The company's personal hygiene standards shall be documented and adopted by all personnel, including visitors to the production facility. These standards shall be developed with due regard for risk of product contamination.	Y	Advised on induction.
Statement of Intent			
6.3.1	The company shall document its jewellery policy.	Y	Well-defined policy
6.3.2	Jewellery shall not be worn, with the exception of a plain wedding ring, a wedding wristband and sleeper earrings (continuous loop). Rings and studs in exposed parts of the body, such as noses, tongues and eyebrows, shall not be worn.	Y	Conforming. No banned jewellery observed on site tour.
6.3.4	Personal items and belongings including personal mobile telephones shall not be taken into production areas.	Y	See above
6.3.5	Drinking of water from purpose-made dispensers and/or by using disposable conical cups or spill-proof containers, may be allowed provided it is confined to a designated area away from equipment.	Y	Satisfactory facilities in place and are monitored for effectiveness.
6.3.6	Procedures shall be in place to control the use of personal medicines to minimise the risk of contamination of product.	Y	Hygiene 2 section of IMS
6.3.7	All personnel, visitors and contractors shall wash their hands after using the toilet, eating, smoking or drinking (unless drinking only water in accordance with the conditions set out in clause 6.3.6) and whenever otherwise necessary.	Y	Satisfactory procedures in place and are monitored for effectiveness

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6.3.8	Fingernails shall be kept short and clean. False fingernails and nail varnish/polish shall not be used.	Y	Satisfactory procedures in place and are monitored for effectiveness
6.3.9	If gloves are used, they shall be replaced regularly. Where appropriate gloves shall be of a disposable type, of a distinctive colour, be intact and not shed loose fibres.	Y	Gloves are of a suitable colour (blue nitrile)
6.3.10	Eating (including the eating of confectionery and chewing of gum or tobacco), drinking and smoking shall not be allowed in the production or packing areas. If it is impractical for personnel to leave their work area, local controlled facilities (such as a fully walled area with hand-washing facilities if appropriate) shall be provided.	Y	Satisfactory procedures in place and are monitored for effectiveness
6.4 Medical Screening			
6.4 Statement of Intent	Health conditions likely to adversely affect product safety shall be monitored and controlled.	Y	Satisfactory procedures in place and are monitored for effectiveness
6.4.1	Personnel shall report if they are suffering from, or have been in contact with, any disease likely to be transmitted through high-risk products, from infected wounds, skin complaints or gastrointestinal illness. Employees and visitors suffering from any of the above shall be excluded from work involving contact with packaging for as long as the symptoms persist.	Y	All employees are trained to report infectious illnesses.
6.4.2	Visitors and contractors shall be required to fill in a health questionnaire prior to being allowed into production areas within the scope of the Standard.	Y	Signed by auditor at entry
6.4.3	All cuts and grazes on exposed skin shall be covered by an appropriately coloured plaster different from the product colour (preferably blue), and containing a metal detectable strip where metal detection equipment is in use. These shall be company issued and monitored. Where appropriate, in addition to the plaster, a finger stall shall be worn, different from the product colour (preferably blue).	Y	Blue metal detectable plasters used.
6.5 Protective Clothing			
6.5 Statement of Intent	Appropriate protective clothing shall be worn to minimise the risk of product contamination.	Y	Clothing is fit for purpose.
6.5.1	Appropriate clean protective clothing that cannot contaminate the product shall be worn.	Y	See above.
6.5.2	Sufficient sets of clothing shall be provided appropriate to the activities carried out.	Y	Employees issued with 3 sweat shirts and 10 polo shirts

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6.5.4	Based on hazard and risk analysis, a policy shall be documented and implemented to state where protective clothing can be worn away from the production environment.	Y	Not considered to be a hazard.
6.5.7	Protective clothing shall be kept clean and laundered. Laundering shall be carried out by one of the following methods: professional laundry service, in-house, controlled laundering facilities or self care.	Y	Self care system used using BRC guidelines
6.5.8	Self-care shall be permitted provided adequate controls and appropriate guidelines are in place. There shall be a defined process for monitoring the effectiveness of the system.	Y	Controlled by supervision.
6.5.9	Clean and dirty clothing shall be segregated and controlled to prevent cross-contamination.	Y	Segregation system in place.

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