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PRODUCT SAFETY AND QUALITY MANUAL

(Based on BRCGS Packaging Issue 6)

ABC

FSMS

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ABC
BRCGS- V.6 Packaging Material Manual

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	SECTION D	**Rev. No. : 00**
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BRCGS Scope for the manufacture and sale of Polyester Film and its Metallization for packaging.

SENIOR MANAGEMNET COMMITMENT

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1. Senior management commitment

1.1 Senior Management Commitment and Continual Improvement Focus

Top mangemnet of the organization has a documented a Quality and Food safety policy which states, site's intention to meet its obligation to produce safe and legally compliant products to the specified quality and confirms its responsibility to its customers. The policy is signed by the CEO and the same is communicated to all staff.

Quality and Food safety Policy is stated below:

a) Product Safety and Quality Culture

Top management has defined and maintained a clear and effective plan for the development and continual improvement of a product safety and quality culture. This include:

a) Defined activities involving all sections of the site that have an impact on product safetyand quality.

b) a description of how the activities will be undertaken and measured, and the intendedtime lines

c) a review on the effectiveness of completed and ongoing activities.

The product safety and quality culture plan is documneted in ABC/BRC/001.

b) Objectives On Product Safety

Site's senior management has established food safety objectives to maintain and improve the quality, safety and legality of products manufactured, in accordance with the site's product safety and quality policy and the BRCGS Packaging Standard. These objectives are:

- Documented and include targets or clear measures of success
- Cearly communicated to relevant staff
- Monitored, and the results are reported top management along with management review meetings. Product safety objectives (ABC/BRC/002)

c) Resources Required

Senior Management provides the human and financial and other resources required for the production of safe packaging material, to the required quality, and in compliance with the requirements of this Standard.

d) System for Review and information to the Site

Senior Management have a system in place to ensure that the site is kept informed of and reviews on the latest:

- scientific and technical developments
- industry codes of practice
- all relevant legislation applicable in the country of manufacture and, where known, the country where the product will be used.

Products shall meet the minimum legal requirements in the country of manufacture and of use where known.

e) The site have a genuine, original copy of BRCGS standard

It is ensured that the site has a genuine, original hard copy or electronic version of the current Standard BRCGS Packaging – version 6.

f) Audits after certification to site

Once the site is certificated to the standard, it will be ensured that recertification audits occur on or before the audit due date indicated on the certificate.

g) Sr. Operation Manager to participate in the meetings

Senior production or operations manager on site shall participate in the opening and closing meetings of the audit for certification to the Standard.

Departmental managers or their deputies will be available as required during the audit.

i) Non-Conformities and Root causes

Senior management shall ensure that the root causes of any non-conformities identified at the previous audit against the standard have been effectively addressed to prevent recurrence.

j) Usage of BRC Logo

The BRCGS logo and references to certification status shall be used only in accordance with the conditions of use detailed in the audit protocol.

1.2 Management Review

Management review meetings are conducted at least once in six months and it is ensured that the top management shall attend the meeting to review the site's performance against the Standard and the Quality and Food Safety Objectives.

The review process includes the evaluation of the agenda items as minimium listed below :

- Previous management review documents, action plans and time frames
- Results of internal, second-party and third-party audits
- Customer performance indicators, complaints and feedback
- Effectiveness of the hazard and risk management (HARM) system
- Impact of any applicable legislative and certification scheme changes
- Incidents, corrective actions, out-of-specification results and non-conforming materials
- Resource requirements
- Objectives that have not been met, to understand the underlying reasons.
  This information will be used when setting future objectives and to facilitate continual improvement.
- The effectiveness of the product defence and product fraud prevention plans.

The minutes of the MRM will be documented and used to revise the objectives. The decisions and actions agreed within the MRM will be effectively communicated to appropriate staff, and actions implemented within agreed time lines.

Site has established a demonstrable system which enables product safety, legality, integrity and quality issues to be brought to the attention of authorised person and resolution of issues requiring immediate action.

1.3 Organizational Structure, Responsibilities and Management Authority

Site has esatblished a documneted organisation chart (ABC/BRC/Annx-01) demonstrating the management structureand reporting channels of the company.

Responsibilities and authorities for the management of activities which ensure product safety, quality and legality are clearly allocated and understood by the managers responsible. It shall be clearly documented who deputizes in the absence of the responsible person.

Site's senior management will ensure that all employees are aware of their responsibilities. Where documented work procedures or instructions exist for activities undertaken, the relevant employees will have access to these and be able to demonstrate that work is carried out in accordance with the instructions.

References

1. Product safety and quality culture plan- ABC/BEC/001
2. Product safety objectives - ABC/BEC/002
3. Organization structure - ABC/BEC/Annx-01

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HAZARD AND RISK MANAGEMNET

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2. Hazard and Risk Management

2.1 Hazard and Risk Management Team

Hazard analysis and risk assessment is developed, reviewed and managed by amultidisciplinary team that includes those responsible for Quality, Production, Engineering/ Maintenance, Operations and other relevant functions as detailed below:

Name	Designation	Role	Qualification
		Team Leader	
		Team Member	
		Team Member	
		Team Member	
		Team Member	
		Team Member	
		Team Member	

In the event that the site does not have the appropriate expertise in-house, external expertise may be used to analyze any hazards and the risk of them occurring, and/or developand review the hazard and risk management system.

In that case, the day-to-day management of the system shall remain the responsibility of the site/Team.

2.2 Hazard Analysis and Risk Assessment

Scope of the hazard analysis and risk assessment is defined and documented, which covers all the products and processes included within the intended scopeof certification.

The HARA team shall maintain awareness of and take into account:

- historical, known and foreseeable product safety hazards associated with specific processes and raw materials
- intended use of the product (where known)
- known likely product defects that affect safety
- relevant codes of practice or recognised guidelines
- regulatory requirements.

Full details of the product, product group and processes will be developed, whichwinclude all relevant information on product safety and integrity:

- Composition of raw materials, ingredients and processing aides used
- Origin of raw materials, including use of recycled materials

Intended use of the packaging materials and defined restrictions on use such as direct contact with food or other hygiene-sensitive products, or the physical or chemical conditions etc. are documented.

Process Flow Diagram

Process flow diagram prepared for manufacture and supply of Polyester Film and its Metallization which will detail each process from the receipt of raw materials, through manufacture, storage, to dispatch to the customer. It will include:

- Receipt and preparation of raw materials , additives and adhesives
- Each manufacturing process step
- In-line testing or measuring equipment
- The use of rework and post-consumer recycled materials
- Any subcontracted processes
- Customer returns.

On Site Confirmation of Flow diagram

The accuracy of the process flow diagram will be verified by the HARA team at least onceper year or following any significant incidents or process changes.

Hazard Analysis and CCP determination

The HARA team identifies and record all potential product safety hazards that are reasonably expected to occur at each step in relation to the product and process. Hazards considered shall include, where relevant:

- Microbiological hazards
- Chemical contamination (e.g. taint, odour, allergen, component transfer, varnishesand glues)
- Potential for unintended migration of substances from the packaging material into food orother hygiene-sensitive products
- Foreign objects
- Potential problems arising from the use of recycled materials
- Foreseeable misuse by the consumer
- Defects critical to consumer safety
- Hazards that may have an impact on the functional integrity and performance of the final product in use
- Potential for malicious intervention(Produt Defense)
- Potential for raw material fraud.

HARA team identifed the control measures necessary to prevent, eliminate or reduce each product safety hazard to acceptable levels.
Where control is through prerequisite programmes, these will be reviewed to ensure they adequately control the risk identified and, where necessary,improvements implemented.

For each hazard that requires control, other than by an existing prerequisite program, the control points are reviewed to identify those that are critical. This process shall include an assessment of the risk level for each hazard based on the likelihood of the occurrence and the severity of the outcome.

Critical Control Points are those control points that are required to prevent, eliminate or reduce a product safety hazard to acceptable levels. Where a control point is not classified as critical and control may be achieved through a prerequisite programme, a programme will be developed that is sufficiently specified to effectively control the identified hazard(s).

CCPs , Critical limits, Monitoring

For each CCP, the appropriate critical limits are defined in order to identify clearly whether the process is in or out of control. Critical limits are measurable, where possible, and the rationale for their establishment clearly documented. Relevant regulatory requirements andcodes of practice willl be taken into account when establishing the limits.

For each CCP, a monitoring system is defined in order to ensure compliance with critical limits. Monitoring records are maintained. Documented procedures relating to the monitoring of critical controls is included in internal audits against theStandard.

The corrective action that needs to be taken when monitored results indicate a failure to meet the control limit for CCPs shall be established and documented. This will include the procedures for quarantining and evaluating potentially out-of-specification products to ensure they are not released until their safety, quality and legality can be established.

A review of the hazard and risk management system and prerequisite programmes will be carried out at least once per year and following any significant incidents or when any process changes.

The review includes a verification that the hazard analysis and risk assessment plan is effective. It also include any:

- Process changes
- Product composition changes
- Complaints
- Product failures and finished product recalls from consumers (including system tests)
- Product withdrawals/recall
- Results of internal audits of prerequisite programmes
- Results from external and third-party audits
- New developments in the industry associated with materials, process or product.

References

1. HACCP Manual.

PRODUCT SAFETY AND QUALITY MANAGEMNET

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3. Product Safety and Quality Management

3.1 Product Safety and Quality Management

Organization has established and documented product safety and quality policies, procedures, work instructions and specifications for processes which are readily accessible and consideration being given to translation into local languages as required

All policies and procedures necessary for the operation of the site being madeavailable at the site. System will be fully implemented, reviewed periodically along with management review meetings and improved as necessary.

3.2 Document Control

Organization has documented procedure (ABC/BRC/003)to manage documents which form part of the product safety and quality management system. This includes:

- A list of all controlled documents indicating the latest version number
- Method for the identification and authorisation of controlled documents
- Record of the reason for any changes or amendments to the documents
- System for the replacement of existing documents when these are updated.

Documents and records are mainatined in hard copy/ electronic form.

Where documnets are maintained in electronic form, it is ensured that the documnets are:

- Stored securely (e.g. with authorised access, control of amendments, or password-protected)
- Backed up to prevent loss or malicious intervention.

3.3 Control of Records

Records are legible, appropriately authorized, retained in good condition, and readily available. Any alterations to records will be authorized and justification for the alteration will be recorded and maintained.

Senior Management ensured that documented procedures are established and implemented for the organization, review, maintenance, storage and retrieval of all records relating to product safety, legality, regulatory compliance and quality.

Site has documented period of retention for records which relate to the usable life of the packaging and the products. These are prepared to take care of customerrequirements as well

3.4 Specifications

Specifications are suitably detailed, accurate and compliant with relevant product safety and legislative requirements. They are maintained in the form of hard copy or electronic document, or part of an online specification system.
Organization makes formal agreement of specifications with relevant parties where required by the customer. Where specifications are not formally agreed, then the organization will be able to demonstrate that it has taken steps to put an agreement in place.

Where packaging for food or other hygiene-sensitive products is produced, a statementof compliance shall be maintained which enables users of the packaging to ensure compatibility between the packaging and the product with which it may be in contact.

The statement of compliance shall be compiled and authorised by a suitably competent person. It shall contain as a minimum:

- Nature of the materials used in the manufacture of the packaging
- Confirmation that the packaging meets relevant legal requirements
- Inclusion of any post-consumer recycled materials.The statement shall

identify:

- Date of issue and, where appropriate, its expiry date
- Limitations of use of the product, and
- Usable life of the packaging

Site will review the statement of compliance at a risk-based frequency.

A specification review process shall be operated where the product composition or characteristics change or at an appropriate predetermined interval. Reviews and changes shall be documented and communicated to the customer, where required.
Any changes to existing agreements or contracts shall be agreed, documented and communicated to appropriate departments.

3.5 Internal Audit

Organization has documneted procedure (ABC/BRC/005)for conducting internal audits.

The frequency at which each activity is audited will be established in relation to the risks associated with the activity and previous audit performance.

All processes shall be audited at least annually.
The internal audit programme shall be fully implemented and effective.

Scope of internal audit program as a minimum to include:

- HARA or product safety and quality plan, including the activities to implement it (e.g.supplier approval, corrective actions and verification)
- Prerequisite programmes (e.g. hygiene, pest control)
- Product defence and product fraud prevention plans
- Procedures implemented to achieve the Standard and modules.

Each internal audit within the programme shall have a defined scope and consider a specific activity or section of the HARA or product safety plan.

Internal Audits are carried out by appropriately trained and competent auditors. Auditors are independent from the process or activity being audited to ensure impartiality (i.e. they must not audit their own work).

Internal audit reports identifies conformity as well as non-conformity.
Results are notified to the personnel responsible for the process/activity audited. Root cause analysis is used to determine appropriate corrective actions and a designated manager will be responsible for the implementation.

Site Inspection

In addition to the internal audit program, a separate program of documented site inspections is formulated (ABC/BRC/006)to ensure that the factory environment and processing equipment are maintained in a suitable condition. This include:

- Hygiene inspections to assess cleaning and housekeeping performance
- Inspections to identify risks to the product from the building or equipment.

The frequency of these inspections will be based on risk.

3.6 Corrective and Preventive Actions

Site has a procedure (ABC/BRC/007)for root cause analysis and corrective actions and to determine preventive actions. Root cause analysis to be usedto implement on going improvements and to prevent recurrence of non-conformities in the event of:

- Analysis of non-conformities for trends which shows that there has been a significantincrease in a type of non-conformity
- Non-conformity which places the safety, legality, integrity or quality of a product at risk(including withdrawals)
- Results of internal, second- or third-party audits
- Customer complaints
- Failure of in-line testing equipment

any incidents.

Organization evaluates the effectiveness of root cause analyses, and of any corrective and preventive actions.

3.7 Supplier Approval and Performance Monitoring

Site has a documented supplier approval procedure (ABC/BRC/008) and continual assessment program in place, based upon risk analysis and defined performance criteria.

These applies to the suppliers of:

- Raw materials, ingredients and packaging materials
- Outsourced (subcontracted) processes.

The procedure ensures that the materials and services procured conform to defined requirements where there is a potential impact to product safety, quality or legality.

Approval procedure is based on risk and include either one or a combination of:

1. Valid certification to the applicable standard or GFSI-benchmarked standard.

2. Supplier audits, scope to include product safety, traceability, HARA review and goodmanufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor.

3. Where a valid risk-based justification is provided, a satisfactorily completed supplier questionnaire may be used for initial approval. The questionnaire has a scope that includes product safety, traceability, HARA review and good manufacturing practices, and it shall have been reviewed and verified by a demonstrably competent person.

Supplier Performance Evalaution

Documented process for ongoing supplier performance review, based on risk and defined performance criteria. This process is fully implemented.

Ongoing supplier assessment records and any necessary actions are maintained andreviewed.

Site mainatins an up-to-date list or database of approved suppliers.

Organization ensures that its suppliers of raw materials have an effective traceability system. Where a supplier has been approved based on a questionnaire instead of certification or audit, verification of the supplier's traceability system will be carried out onfirst approval and then at least every 3 years. This may be achieved by a traceability test.

Where raw materials are purchased from agent, broker or wholesaler , site obtains the identity of the last manufacturer or packer.

Information to enable the approval of the manufacturer or packer will be obtained from the agent/broker or directly from the supplier, unless the agent/broker is certificated to the relevant standard.

The procedures also defines where the company collects the documents listed below on receipt of materials in the form of ::

- Certificate of Analysis
- Statement of Compliance.

3.8 Product Authenticity, Claims and Chain of Custody

Organization has processes in place to access information on historical and developing threats to the supply chain which may present a risk of substitution of raw materials (i.e. fraudulent raw materials). Such information may, for example, come from:

- Trade associations
- Government sources
- Private resource centres.

A documented vulnerability assessment shall be carried out on all raw materials or groups ofraw materials to assess the potential risk of substitution. This shall take into account:

- Historical evidence of substitution
- Economic factors which may make substitution more attractive
- Ease of access to raw materials through the supply chain
- Sophistication of routine and upstream testing to identify substitution
- Nature of the raw material.

Output from this assessment is documented in vulnerability assessment plan.(ABC/BRC/011)

Plan is kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risks.

It shall be reviewed annually.

Where raw materials are identified as being at particular risk of substitution, the vulnerability assessment plan shall include appropriate assurance and/or testing processes to mitigate the identified risk(s).

3.9 Management of Subcontracted activities and Outsourced processes

Organization demonstrates that, where any part of the production is outsourced and undertaken off-site, this has been declared to the customer where required, approval has been granted.

Where any processes are subcontracted, risks to the quality and safety of the product will form part of the hazard andrisk analysis and the organization evaluation of the system will be held on record.

Clear specifications are agreed for all work outsourced or subcontracted.

Where any process steps in the manufacture of the packaging materials are subcontracted oroutsourced, final release of the product shall remain the responsibility of the site.

Controls shall be in place for checks on finished work to ensure product safety and quality meets specification prior to dispatch to the final customer.

organization ensures that any subcontracted or outsourced processors have an effective traceability system.

Where a supplier has been approved based on a questionnaireinstead of certification or audit, verification of the supplier's traceability system shall be carried out on first approval and then at least once every 3 years. This may be achieved by a traceability test.

3.10 Management of Suppliers of Services

There shall be a documented procedure for the approval and monitoring of suppliers ofservices. Such services shall include, but are not limited to:

- Pest control
- Laundry services
- Transport and distribution
- Storage and dispatch
- Sorting or rework
- Laboratory services
- Calibration services
- Waste management
- Product safety and quality consultants to the site.

Providers of utilities such as water, electricity or gas may be excluded on the basis of risk.This approval and monitoring process shall be risk-based and take into consideration:

- Risk to the safety and quality of products
- Compliance with any specific legal requirements

potential risks to the security of the product (i.e. risks identified in the vulnerability and product defence assessments).

Contracts or formal agreements shall exist with the suppliers of services which clearly define service expectations and ensure potential risks associated with the service have beenaddressed.

3.11 Traceability

Organization has documented traceability procedure and system that can trace and follow all raw materials from the supplier through all stages of processing (including subcontracted processes) and distribution of the finished product, and vice versa.(forward & backward)

Identification of raw materials, intermediate products, finished products, non-conforming products and quarantined goods shall be adequate to ensure traceability.

For traceability, batch number system is in place to ensure that the customer canidentify a product or production lot number for the product.

Traceability procedure and system(mock traceability) is tested at a predetermined frequency, at least annually, and the results shall be retained and easily retrieved for inspection.

Traceability of all materials shall be achievable in a timely manner.

Where rework or any reworking operation is performed or outsourced or subcontractedactivities are carried out, traceability shall be maintained.

Traceability of test data and samples to production lots are maintained.

3.12 Complaint-handling

Documneted procedure (ABC/BRC/012) for handling customer complaints are recorded and investigated (including root cause analysis) and the results of the investigation documented.

Actions appropriate to the seriousness and frequency of the problems identified are carried out promptly and effectively by appropriately trained staff.

Complaint data are analyzed to identify significant trends. Where there has been an increase or repetition of a complaint type, root cause analysis is used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. Analysis will be made available to relevant staff.

3.13 Management of Product Withdrawals, incidents and product recalls

Documnetred procedure (ABC/BRC/013)for product withdrawal/recall is documented and include as a minimum:

- Identification of the key personnel involved in assessing potential product withdrawals orreturns, with their responsibilities clearly defined
- A communications plan including methods of informing customers
  root cause analysis and corrective action to implement appropriate improvements asrequired.

Withdrawal procedure is capable of being operated at any time and will take into account notification to the supply chain, stock return, logistics for recovery, storage ofrecovered product, and disposal.

Organization provides written guidance and training for relevant staff regarding the type of event that would constitute an incident.

Incidents will include:

- Disruption to normal production processes
- Disruption to key services such as water, energy, transport, refrigeration processes, staffavailability and communications
- Events such as fire, flood or natural disaster
- Malicious contamination or sabotage
- Failure of, or attacks against, digital cyber-security.

Where products which have been released from the site could be affected by an incident, the need to withdraw products and, where appropriate, advise customers to withdraw and/or recall products is considered.

A documented incident reporting procedure shall be in place.

Organization determines and document the activity required to effectively manage an incident to prevent release of product where hygiene, safety or quality may have beenaffected.

A procedure to manage product recalls initiated by the brand owner or specifier is documented and includes:

- Identification of the key personnel involved in assessing potential recalls, together withclearly defined responsibilities
- A communications plan that includes methods of informing customers and (where necessary) regulatory bodies in a timely manner.
- Where a site's products are involved in a product recall, the site will assist with provision of information (such as traceability) as required.

The product withdrawal procedure is tested, minimum annually, in a way that ensures its effective operation. Results of the test is retained.

Results of the test, and of any actual withdrawals, shall be used to review the procedure and implement improvements as necessary.

References

1. Procedure for Control of Documents. ABC/BRC/003
2. Procedure for Control of Records. ABC/BRC/004
3. Procedure for Internal Audit. ABC/BRC/005
4. Procedure for PRP/Site Inspection. ABC/BRC/006
5. Procedure for Corrective and Preventive Action. ABC/BRC/007
6. Procedure for Supplier Approval/ Evaluation. ABC/BRC/008
7. Procedure for Product Fraud. ABC/BRC/009
8. Product Vulnerability Assessment. ABC/BRC/010
9. Product Vulnerability Plan. ABC/BRC/011
10. Procedure for Customer Compliant Handling ABC/BRC/012
11. Procedure for Product Recall/ Withdrawal ABC/BRC/013

SITE STANDARDS

4.1 External Standards

External areas of the site environment, which may have an adverse impact on the safety or quality of the finished product or raw materials, are maintained well to prevent contamination. Where measures have been put in placeto protect the site, they are regularly reviewed to ensure they continue to be effective.

External areas of the plant are maintained in good order. Any grassed or planted areas surrounding buildings shall be regularly tended and well maintained. External traffic routesunder site control shall be suitably surfaced to avoid contamination of the product.

Building fabric is maintained to minimise potential for pest entry, ingress of water and other contaminants. External silos, pipework or other access points for the product and/or raw materials are sealed and secured. Where possible, a clean and unobstructed area will be provided along the external walls of the buildings used forproduction and/or storage.

Drainsshall be properly protected to prevent entry of pests.

4.2 Building Fabric and Interiors

Raw materials Handling, Preparation, Processing, Packing and Storage areas

Walls, floors, ceilings and pipework are maintained in good condition and are facilitatecleaning.

Internal drain openings are suitably protected against the entry of pests anddesigned to minimize odour. Where they constitute a risk to product, and based on the likelihood and risk ofcontamination, windows and roof glazing are protected against breakage.

Where glass panels constitute a risk to product, based on the likelihood and risk of non- production glass contamination, all bulbs and strip lights, including those on flying-insect control devices, are adequately protected. Glass policy is established.

Lighting

Suitable and sufficient lighting is provided to ensure a safe working environment, correct operation of processes, effective inspection of the product and cleaning.

Suitable and sufficient ventilation shall be provided.

4.3 Utilities

Water

All water used in the processing of the products or equipment cleaning are potable or suitably treated to prevent contamination.

Based on risk assessment, the microbiological and chemical quality of water, steam, air, compressed air or other gases which come into direct contact with packaging are regularly monitored. These will present no risk to product safety or quality and shall comply with relevant legal regulations.

4.4 Site Security and Product Defense

Documented risk assessment (threat assessment) procedure in place of the security arrangements and potential risks to the products from any deliberate attempt to inflict contamination or damage. This threat assessment includes both internal and external threats.

The output from this assessment is documented product defence plan.

Areas shall be assessed according to risk; sensitive or restricted areas shall be defined, clearly marked, monitored and controlled.

This plan shall be kept under review to reflect changing circumstances and external influences. It will be formally reviewed at least annually.

Measures are in place to ensure only authorised personnel have access to production and storage areas, and access to the site by employees, contractors and visitors are controlled.

Visitor reporting system is in place. Staff being trained in site security proceduresand encouraged to report unidentified or unknown visitors.

External silos and any intake pipes with an external opening aresufficiently secure to prevent unauthorized access.

4.5 Layout, Product Flow and Segregation

Site maintains a current map or plan of the site which defines:

- Access points for personnel
- Travel routes for personnel, raw materials and intermediate or finished products
- Staff facilities
- Routes for the removal of waste
- Production and process flows
- Storage areas.

The process flow from intake to dispatch are arranged to minimize the risk ofcontamination or damage to the product.

Premises allow sufficient working space and storage capacity to enable all operationsto be carried out properly under safe and hygienic conditions.

Sorting or other activities involving the direct handling of the product takes place in areas that have, as a minimum, the same standards as production areas.

4.6 Equipment

Production, storage and warehousing equipment are designed for the intended purpose and ensures minimise the risk of contamination to the product. Lubrication points andapplication methods of any lubricant are be able to contaminate the product.

Equipment are constructed of suitable materials and be designed to ensure it can be effectively cleaned and maintained.

Newly installed equipment are properly specified before purchase. New equipment are tested and commissioned prior to use and a maintenance and cleaning programmeestablished.

Wooden equipment including desks, chairs, tables, etc. are properly sealed to enableeffective cleaning. This equipment is kept clean, in good condition and free from splinters or other sources of physical contamination.

4.7 Maintenance

Documented preventive maintenance program (ABC/BRC/017) is operated, covering all items of production equipment and plant critical to product safety, legality and quality, to prevent contamination and reduce the risk of breakdown.

Maintenance logs are maintained for all off-line testing equipment.

In addition to any preventive maintenance programme, where there is a risk of product contamination by foreign bodies arising from equipment failure or damage, the equipment will be inspected at predetermined intervals, inspection results documented, and appropriate action taken.

Maintenance work shall not place product safety, quality or legality at risk. Maintenance work is followed by a documented clearance procedure which records that contamination hazards have been removed and equipment cleared to resume production.

Tools and other maintenance equipment are cleared away after use and appropriatelystored.

Temporary Repairs

Temporary repairs/modifications using tape, cardboard, etc. are only be permitted in emergencies and where product contamination is not at risk. Such modifications will besubject to a time limit and are recorded and scheduled for correction.

Engineering workshops is controlled to prevent transfer of engineering debris to production or storage areas.Contractors involved in maintenance or repair are suitably monitored (work permit system) by a staff memberwho are responsible for their activities.

4.8 House keeping and Cleaning

Documented cleaning procedure(ABC/BRC/018) is in place and maintained for buildings, equipmentand vehicles. Cleaning schedules and procedures includes the following information:

- Responsibility for cleaning
- Item/area to be cleaned
- Frequency of cleaning
- Method of cleaning
- Cleaning materials to be used
- Cleaning record and responsibility for verification.

Frequency and methods of cleaning are based on risk.

Cleaning chemicals used are fit for purpose, suitably labelled, and used in accordance with manufacturers' instructions. They are stored in a secured, designated location, in closed containers. Chemicals that are strongly scented or could give rise to taint and odour contamination are not used.Materials and equipment used for cleaning toilets are differentiated from those usedelsewhere, and physically segregated where necessary.

Environment Monitoring Program

Environment monitoring programme is documented (ABC/BRC/019) based on risk, is in place to ensure that the cleaning operations are effective in minimising the risk of contamination by microorganisms that would be detrimental to the products.

Program considers the likelihood of the microorganisms' survival on packaging materials and their use.

EMP include:

- Sampling protocol
- Identification of sample locations
- Frequency of tests
- Target organisms (e.g. pathogens, spoilage organisms and/or indicator organisms)
- Test methods
- Recording and evaluation of results.

4.9 Product Contamination Control

4.9.1 Glass, Brittle plastics, Ceramics and Similar materials control

Glass and brittle plastic policy is documented and implemneted, which include controls over glass, brittle plastic and ceramic or similar products in the prodution and storage areas.

Glass or brittle plastics (other than the product) that pose a potential product contaminationhazard is controlled and recorded on a register that includes:

- List of items detailing location, number, type and condition
- Recorded checks of condition of items, carried out at a specified frequency that is based onthe level of risk to the product
- Details on cleaning or replacing items to minimise the potential for product contamination.

Where non-production glass or brittle plastic breakage occurs, a responsible person is placed in charge of the clean-up operation and shall ensure that no other area is allowed to become contaminated due to the breakage. Any product that has become contaminated are segregated and disposed of.All breakages are recorded in an incident report.

4.9.2 Sharp and Metal Control

Policy for the controlled use and storage of sharp implements,including knives, needles and wires, to prevent contamination is documented

Production equipment that incorporates blades or sharps will be monitored. Blades orother sharp implements are not allowed to contaminate the product.Snap-off blade knives are not used.Notice boards in production, packing and storage areas, loose fastenings, such as drawing pins and staples, are not used.

4.9.3 Chemical and Biological Control

Procedure is documented to manage the use, storage and handling of non-production chemicals, to prevent chemical contamination. These include:

- List of approved chemicals for purchase
- Availability of material safety data sheets and specifications
- Avoidance of strongly scented products
- Labelling and/or identification of containers of chemicals at all times
- Designated storage area with access restricted to authorised personnel
- Use by trained personnel only.

Hazard and risk analysis is used to identify, control and manage any potential risks from microbiological contamination and any potential allergens.

4.10 Waste and Waste Disposal

Procedure (ABC/BRC/023) is established to manage the waste collection and disposal of waste.Licensed waste collators are engaged for remaoval of waste.Process waste is managed to minimize release to the environment.

Suitable and sufficient refuse and waste containers are provided, which are emptied at appropriate frequencies and maintained in an adequately clean condition.

Waste containers are categorized based on the intended means of disposal (such as recycling), and sorted, segregated and collectedin appropriate designated waste.Substandard trademarked materials are rendered unusable through a destructiveprocess. All materials disposed of are recorded.

Wherever substandard trademarked materials are transferred to a third party for destruction or disposal, that third party will be a specialist in appropriate waste disposal and provides records of material destruction.

4.11 Pest Management

Pest control procedure (ABC/BRC/024) is esatblished to control pest in the facility.

Organization assesses the suitability of its pest management program to address variationin pest activity through different seasons, and consider any additional preventive activity required.

Organization has a contract with a competent pest management organisation for the regular inspection and treatment of the site in order to deter and eradicate infestation. The frequency of inspections are determined by risk assessment and documented.

Services of a pest management contractor are employed, the service contractwill be clearly defined and reflect the activities of the site.

Equipment such as bait stations traps or electric fly-killing devices are appropriatelylocated and operational.Effective precautions are in place to prevent pests entering the premises. Buildingis suitably proofed against the entry of all pests via doors, windows, ducts and cable entry points.

Which will include measures to prevent birds from entering buildings or roosting above loading or unloading areas.

In the event of infestation, immediate action will be taken to eliminate the hazard. Action shall be taken to identify, evaluate the potential for contamination or damage, and authorisethe release of any product potentially affected.

In the event of an infestation, and at appropriate intervals, the site requests a catchanalysis from flying-insect control devices to help identify problem areas.
In the event of increase in activity, the site uses risk assessment to determine theactivity required to eliminate the hazard.

Documented procedures and detailed records of pest activity, pest management inspection sand recommendations are maintained. These include:

- an up-to-date, signed and authorised site plan identifying numbered pest control devicesand their locations
- Identification of the baits and/or monitoring devices on site
- Clearly defined responsibilities for the site management and the contractor
- Details of pest control products used and instructions for their effective use
- Detailed records of inspections, recommendations and of any pest infestation.

It will be the responsibility of the site to ensure that all the relevant recommendations
Are made by the contractor are implemented in a timely manner and monitored for efficacy.

Employees are made aware of the signs of pest activity and the need to report anyevidence to a Pest Control Officer.

References

1. Procedure for Product Defense. ABC/BRC/014
2. Product Defense Threat Assessment . ABC/BRC/015
3. Procedure for Preventive Maintenance. ABC/BRC/016
4. Procedure for House Keeping & Cleaning. ABC/BRC/017
5. Procedure for EMP ABC/BRC/018
6. EMP Risk Assessment ABC/BRC/019
7. Glass, Brittle Control Procedure ABC/BRC/020
8. Chemical Control Program ABC/BRC/021
9. Procedure for Waste Management ABC/BRC/022

PRODUCT AND PROCESS CONTROL

5 Product and Process Control

5.1 Product Development

It is not applicable as it is not covered in the scope

5.2 Graphic design and artwork control

It is not applicable as it is not covered in the scope

5.3 Packaging print control

It is not applicable as it is not covered in the scope

5.4 Process control

Hazard and risk management team identifies and record all potential product defects that are reasonably expected to occur at each step in relation to the product and process based on flow diagram.

The hazards considered includes:

- Product quality defects
- Defects that may have an impact on the functional integrity and performance of the finalproduct in use defects which result in the production of products which are outside customer-specified quality parameters.

For each manufacturing process control point, machine settings or process limits areestablished and documented – the process specification.Where equipment settings are critical to the safety or legality of the product, changes tothe equipment settings are only be completed by trained and authorised staff. Where applicable, controls are password-protected or otherwise restricted.Process specification (including manufacturing process control points) are available for each batch or lot during production.

Documented process check is esatblished at start-up, following adjustments to equipment and periodically during production, to ensure products are consistentlyproduced to the agreed quality specification.

In the event of changes to product composition, processing methods or equipment, the site, re-establish process characteristics and validate product data to ensure that product safety, legality and quality are achieved.

The documented line clearance procedure includes:

- Roles of persons involved in line clearance

- Areas where materials can become trapped
- Validation of the line clearance
- Sign-off for continuing production.

The line clearance procedure is fully implemented for each production run.

5.5 Calibration and Control of Measuring and Monitoring devices

Pocedure for calibration of measuring and monitoring equipments is (ABC/BRC/025) established to identify and control in-line and off-line measuring equipment used to monitor the product safety, quality and legality.

Which will include:

- Documented list of equipment and its location
- An identification code and calibration due date
- Prevention from adjustment by unauthorised staff
- Protection from damage, deterioration and misuse.

All identified measuring equipment are checked and adjusted at a predetermined frequency, based on risk analysis. This will be carried out by trained staff to a defined method to ensure accuracy within defined parameters. All results are documented.Where possible, calibration shall be traceable to a recognised national or international standard. Where a traceable calibration is not possible, the site demonstrates the basisby which standardisation is carried out.

Corrective action and reporting procedures are documented in the event of the monitoring and testing procedure identifying any failure of product inspection, testing or measuring equipment. Any such failures will be subject to an assessment of potential risk; subsequent action may include a combination of isolation, quarantine and re- inspection of products produced since the last acceptance test of the equipment.

Organization conducts a root cause analysis into the equipment failure and implement the appropriate corrective action.

5.6 Product Inspection, Testing and Measuring

In process and final product inspection/ testing for quality checks are carried out to demonstrate that the finished product is within the tolerances laid down in the agreed product specification and conforms to any criticaltechnical/legal requirements.

Frequency of checks and sampling are in accordance with industry-accepted practice or customer requirements and based on risk analysis.

Procedure for quality control (ABC/BRC/026) defines how samples used for checking in-process quality are disposed of.Hazard and risk analysis principles are used to determine the need for in-line producttesting equipment to ensure product safety, quality and legality.

Accuracy of in-line equipment are specified (with permitted tolerances), having due regard to the product parameter being controlled.

Organization has established, documented and implemented procedures for the operation, routine monitoring and testing of all equipment used in product inspection, testing and measurement. Which includes:

- Frequency and sensitivity of checks
- Authorisation of trained personnel to carry out specified tasks
- Documentation of test results.

Routine off-line quality checks are carried out at appropriate stages in production to demonstrate that the product is within the tolerances laid down in the agreed product specification.In-line testing equipment critical to product quality or safety is incorporated to the system to identify non-conforming product for removal or divert it out of the product flow.

Test methods used by the site in both on-line and off-line testing are validated to ensure their sensitivity, reproducibility and range, in addition to any other relevant criteria.

Where standardised tests are used, the site ensures prescribed methodologies arefollowed.

Where testing shows out-of-specification results, a documented procedure for

investigating these results are established and followed to determine whether the cause is non-conforming product or a testing failure.Organization has established and implemented a procedures in the event of a failure in the equipment.

Where the Organization undertakes or subcontracts an analysis critical to product safetyor legality, the laboratory or subcontractors will have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025 for the test undertaken.

5.7 Control of Non Conforming Product

Procedure for control of non conforming products (ABC/BRC/027) for the control of out-of-specification or non-conforming materials are in place, These includes the effective identification and management of materials before a decision has been made on their final disposition.Non-conforming materials are assessed and a decision taken to reject, accept by concession, rework or put to alternative use. The decision and reasons are documented.

5.8 Incoming Goods

Incoming inspection criteria being documented for raw materials and intermediate product intake procedure to ensure that incoming goods match purchase or product specifications. This may take theform of:

- Purchase orders
- Delivery notes.

Procedure for the inspection of loads on arrival to ensure that products are free from pest infestation, contamination or damage and are in a satisfactory condition.Unloading areas for bulk deliveries are clearly identified and designed to preventproduct mix-ups.

Regarding raw materials, all complaints or defects identified by the site are recorded and investigated (including root cause analysis) and the results of the investigation documented.Procedure for the acceptance of raw materials includes a valid certificate of analysis (CoA) or testing.

All raw materials awaiting the results of in-house testing or verification of data are held until released for use.

Receipt documents and/or product identification arel facilitate correct stock rotation ofgoods in storage and, where appropriate, ensure materials are used in the correct order and within the prescribed shelf life.

5.9 Storage of all materials and intermediate and finished products

Procedures for safety and quality during storage is risk-based, understood by the relevant staff, and implemented accordingly. Which shall include:

- Instructions for the packing of finished product
- Segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergenic), mixing of sorts, or taint
- Storage of product/materials off the floor and away from walls
- Specific handling or stacking requirements to prevent product damage.

All materials, work in progress and finished product are properly identified and protected during storage by appropriate packaging to protect them from contamination.

Storage, including off-site storage, are controlled to protect the product from contamination, including taint or odour and malicious intervention.

Finished or intermediate product storage will meet customer requirements (with regard tofirst in, first out (FIFO), where applicable), with dispatch after positive release.

Where external storage of finished product is required, the product shall be suitablyprotected.

Packaging used for storage or dispatch of intermediate or finished products, such as pallets, are appropriately protected if stored outside and inspected for signs of damage or contamination prior to use.

In order to prevent contamination, documented procedures is in place to appropriately segregate raw materials, intermediate products and finished products.

It is ensured that hazardous chemicals are handled in such a way that risk to productsafety, quality and legality is minimised.

Material intended for recycling are appropriately protected against contaminationhazards.

5.10 Desptach and Transport

Procedure for Despatch and transport (ABC/BRC/029) esatblished which include:

- Restrictions on the use of combined loads (e.g. where materials from other companies are in the same transport)

- Requirements for the security of products during transit, particularly when vehicles are parked and unattended away from a designated storage depot.

All products and materials are identified and either protected during distribution by appropriate external packaging or transported under conditions to protect the product from contamination. This includes the risk of taint or odour and of malicious intervention.

All pallets are checked. Damaged, contaminated or unacceptable pallets are discarded. Wooden pallets that come into direct contact with finished products or raw materials are not be allowed to contaminate the product.

All company-owned or leased vehicles used for deliveries included in the documented cleaning schedules and kept clean and in a condition that minimises the risk of product contamination.

Delivery vehicles and shipping containers are subject to a documented hygiene and odour checking procedure before loading.Where the organization employs third-party contractors, and there will be a contract or agreed terms and conditions which will include general carriers, the packaging to be adequate to protect the product against damage, contamination hazards, taint and odour

Vehicle drivers must comply with the site rules relevant to this standard.
Access to the site for third-party transport personnel are controlled and, where possible, facilities provided to negate the need to enter storage or production areas.

References

1. Procedure for Production. ABC/BRC/024
2. Procedure for Calibration of Measuring Equipment. ABC/BRC/025
3. Procedure for Quality Control. ABC/BRC/026
4. Procedure for Control of Non Conforming Products . ABC/BRC/027
5. Procedure for Storage of Raw Materials/ Intermediary products & Final products ABC/BRC/028
6. Procedure for Dispatch and Transport ABC/BRC/029

PERSONNEL

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6 Personnel

6.1 Training and Competence

Procedure for training (ABC/BRC/030) is esatblished covering all personnel, including temporary personnel and contractors, who are appropriately trained prior to commencing work and adequately supervised throughout the working period.

Induction training includes the company hygiene rules.

Where personnel are engaged in activities relating to product safety, quality and legality, relevant training and competency assessment are in place. Which includes:

- Calibration
- Product inspection, testing and measuring
- Printed packaging controls
- Operatives at manufacturing process control points
- Laboratory testing
- Product defence.

Procedure defines and document how new or changed procedures, working methods and practices related to product safety or quality are communicated to relevant personnel.

Organization periodically review and document the competencies of all staff and provide relevant training as appropriate. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience.

Records of training are available. which includes:

- Name of the trainee and confirmation of attendance
- Date and duration of the training
- Title or course contents, as appropriate
- Training provider (external or internal provider).

Where training is undertaken by agencies outside the company, records of the training are mainatined.

It is ensured that documented training needs of relevantpersonnel are identified. Which includes:

- Identifying the necessary competencies for specific roles
- Providing training or other action to ensure staff have the necessary competencies
- Reviewing the effectiveness of training and trainers
- Delivery of training in the appropriate language of trainees.

6.2 Personal Hygiene

Procedure for personal hygiene (ABC/BRC/031) is inplace for personal hygiene at sites producing materials for direct contact withproducts. Which include the following instructions:

- Wrist bands, wrist-worn devices or watches shall not be worn
- Jewellery including piercings shall not be worn on exposed parts of the body, with theexception of a plain wedding ring, wedding wristband or medical alert jewellery
- Fingernails shall be kept short and clean and free from nail varnish
- False fingernails and nail art shall not be worn
- Excessive perfume or aftershave shall not be worn.

Requirements at sites producing materials not for contact with food are based on risk assessment. Compliance with the site's requirements are checked routinely.

Hand-washing must be performed on entry to the production areas and at a frequency that is appropriate to minimise the risk of product contamination.Personal items and belongings, including personal mobile phones, are not be taken into production areas without the permission of the management.

Site uses risk assessment to determine the procedures and written instructions necessary to control the use and storage of personal medicines in production and storage areas, to minimise the risk of product contamination.

Where visitors cannot comply with site hygiene rules, suitable control procedures will be inplace.

All cuts and grazes on exposed skin to be covered by an appropriately coloured plaster that is different from the product colour. These shall be site-issued and monitored when people are involved in work with materials intended to come into direct contact with food or other hygiene-sensitive products. Where appropriate, in addition to theplaster, a finger stall or glove shall be worn.

6.3 Staff Facility

Locker rooms are accessed without the need to enter production area.Lockers are provided for all personnel who work in raw material handling, processing, preparation, packing and storage areas.

Eating (including the eating of confectionery and chewing of gum or tobacco), drinking andsmoking are not allowed in locker and changing rooms.

Sufficient hand-washing facilities are available to enable cleaning of handsbefore commencing work, after breaks, and as necessary during the course of work. Such hand-washing facilities provides:

- Sufficient quantity of water to encourage hand-washing
- Unscented liquid soap or foam
- Adequate hand-drying facilities/ Disposal paper towel
- Advisory signs to prompt use.

It is ensured that hand-washing facilities are not situated at the entrance to the production area.Toilets are not open directly into storage, processing or production areas in order to prevent the risk of contamination to product. Toilets are provided with suitable andsufficient hand-washing facilities.

Facilities for visitors and contractors are enable compliance with the site's hygiene policy.No food shall be taken into storage, processing or production areas.Eating , drinking and smoking are not allowed in the production or storage areas.

Smoking is only be permitted in designated controlled areas which is isolated from production and storage areas. Adequate arrangements for dealing with smokers' waste shall also be provided at smoking facilities, both inside buildingsand at external locations.

6.4 Medical Screening

Medical examination of the personal who are intended for direct contact with food are done annually and records are maintained. Procedure for the notification by personnel, including temporary personnel, of any relevant infections, diseases or conditions with which they may have been in contact or be suffering from.

Employees, contractors and visitors suffering from any of the above shall be excluded from work involving the handling of direct food contact product packaging for as long as the symptoms persist.

Visitors and contractors are required to fill in a health questionnaire or otherwise confirm that they are not suffering from any symptoms which may put product safety at risk, prior to being allowed into production, packing or storage areas.

6.5 Protective Clothing

Hair coverings and/or beard snoods, are worn in production areas for direct contact with products.

Hazard and risk principles are applied to determine the need for any other protective clothing, including garments and footwear in areas handling raw materials, and in preparation, production and storage areas.

Where protective clothing is required, clean protective clothing shall be provided.Protective clothing shall have no external pockets on the upper body garments or sewn-on buttons.

Protective clothing are kept clean and laundered. Laundering are carried out by one of the following methods:

- Professional laundry service
- In-house
- Controlled laundering facilities

Clean and dirty clothing shall be segregated and controlled to prevent cross-contamination.

Disposable protective clothing, if used, shall be subject to adequate control to avoid product contamination.

References

1. Procedure for Training . ABC/BRC/030
2. Procedure for Personal hygiene . ABC/BRC/031

REQUIREMENTS OF TRADED PRODUCTS

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7. **Requirements for traded products**

At Present Not applicable as there is no such activity