

Audit Report



GLOBAL STANDARD FOR PACKAGING AND PACKAGING MATERIALS

(Issue 4, February 2011)

HIGH HYGIENE RISK AUDIT REPORT

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 1 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of NB Certification

**P026: Global Standard for Packaging and Packaging Materials Issue 4
 February 2011**

Audit Report

**Global Standard for Packaging and Packaging Materials
 Issue 4 : February 2011**

Company Name:	Positive Packaging Industries Ltd	Site name:	Khopoli
Audit Category:	High Hygiene Risk	BRC Site Code:	8052374

Audit Result:	CERTIFICATED	Audit Grade:	B
		Audit Frequency :	12 months

A or B = 12 months
 C = 6 months

Audit Start Date:	2011-11-07	Audit Finish Date:	2011-11-09
Re-audit Due Date:	2012-11-22	Previous Audit Date:	2010-11-11

Auditor Number (one only : team leader)	Auditor Names
204014	Anis Munshi

Scope Details

Packaging Field:

04 - Plastics

Select a packaging field

Select a packaging field

Select a packaging field

Scope of Audit:	The production of in-house blown PE film, rotogravure printing, adhesive lamination, extrusion lamination, hot-melt, slitting, pouching, shrink sleeves and supply of reels and pouches/sleeves of these flexible food-contact packaging
------------------------	--

Exclusions from Scope:	None
-------------------------------	------

Products in production at the time of the audit:

Bingo, Biscuits, Old el Paso Tortillas, Motor Oil, Fruit Pack

Company Profile

Positive Packaging is part of the Enpee Group which has operations of its core packaging activity in India, Nigeria & the UAE. India: Positive Packaging Industries Ltd Positive Flexibles at Khopoli (subject of this audit): print, laminate & convert flexibles. Positive Packaging Industries Ltd: Khopoli site (subject of this audit). Positive Packaging established its purpose-built site at Khopoli (130km east of Mumbai) approx. 20 years ago, adding an 'Export Only Unit' (EOU) as a separate, adjoining site in 2004. The two sites were merged into one business unit in 2008 and have BRC-IoP certification and ISO 9001-2000 certification (DNV). The site totals approx. 4 acres, of which 2 acres in covered buildings. The current workforce is approx. 1000, covering 24/7 operations in 8-hour shifts. Throughput currently stands at approx. 2250mt / month from four eight-colour presses, one ten-colour press, one six-colour press, 4 laminators, seven slitters, two blown PE film lines, two extrusion lamination lines, 3 standard pouching machines, three gusset-base pouching machines, a flat retort-pouching line and 7 shrink-sleeve conversion machines. One additional printing line and a new blown PE line are currently being installed and are expected to commence operation early in 2011. The customer base includes food manufacturers & packers, the petro-chemical industry, the cosmetics industry, the detergent industry and the beverage industry in India, the UK, Europe, Africa, the Middle East, Far East & US.

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 2 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

Detail of Non Conformities

Summary of Non-Conformity Raised

	No.		No.
Critical non-conformity	0	Major non-conformity	1
Major against statement of intent of a Fundamental clause	0	Minor non-conformity	5

Critical

No.	Requirement ref.	Detail of Non-Conformity	Proposed audit date	Reviewed by

Major against SOI of a Fundamental Clause

No.	Requirement ref.	Detail of Non-Conformity	Proposed audit date	Reviewed by

Major

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Date signed off	Reviewed by
1	4.7.6	Temporary engineering seen on all old printing machines e.g. -pipes feeding granule into tote bins labelled using sellotape. -cardboard used to prevent splash back on all old printing machines Temporary engineering is not recorded and scheduled for correction	Procedure has been revised to address temporary engineering issues and documentation. Training has also been provided.	Reference: <ul style="list-style-type: none"> • PENG-P-01 Plant Maintenance procedure revised ref PENG-P-01 dated 25/11/11 attached.pdf • Temp Engineering Kiefel machine before and after.ppt slide • Temp. engineering On Printing machine before and after.ppt slide • Training on Temporary Engineering given to personnel on 24/11/11.pdf 	2011/12/01	AMunshi

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG			Auditor: Anis Munshi		
P026 Issue: 4	Page 3 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4		

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

Minor

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Date signed off	Reviewed by
2	4.1.2	Full and empty gas cylinders found "strewn" in external areas	Due to the site being large several engineers around the site use the gas cylinders, which are then left there. A specific location has now been created for the cylinders, and access is via a key held by selected personnel	Cylinders seen locked in particular place on site	2011/11/11	AMunshi
3	5.3.4	Line clearance procedure on "Bimec 5" seen not verified by QA	Line clearance training has been conducted for relevant personnel by Head QA and Slitting HOD.	Reference • Line clearance training done on Slitting Unit 2 on the 17-18/11/11 ref.jpg	2011/12/01	AM
4	5.4.3	Leak test procedure does not indicate the pressure at which the test is to be done	The procedure has been revised to include testing pressures. Accordingly, training on the revised procedure has been conducted.	Reference • SOP revised for Bursting Strength of Pouch by Balloon Burst Tester ref PQAD-W-02-40 version 2 attached.pdf • Training provided on new SOP to all personnel ref ECAT-F-01/17 on 17-18/11/11 attached.jpg	2011/12/01	AM
5	5.8.2.3	List of personnel with sharps is not in place	The list is generated and being maintained in respective departments and updated as necessary.	Reference • List of personnel with Sharps in Lamination Unit 2 dated 18/11/11 attached page 1 & 2.jpg • List of personnel with Sharps in Extrusion Lamination Tandem department attached.jpg	2011/12/01	AM
6	6.5.4	Personnel seen walking outside production area with	Notice has been put up on notice boards with approval from the	Reference	2011/12/01	AM

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG

Auditor: Anis Munshi

Audit Report

		protective clothing	management informing all employees on usage of company issued clothing and accessories.	<ul style="list-style-type: none">• Notice regarding Company Issued Clothing dated 24/11/11 signed by the General Manager displayed.pdf attached		
--	--	---------------------	---	--	--	--

Audit Report

Company Details

Company Name : Positive Packaging Industries Ltd. Flexibles Division	
Site Name : Khopoli	
Address : Survey Nos 51, 52, 53, Village Ranasai, Km16 Khopoli-Pen Rd.,Khopoli, 410 203 Maharashtra.,	
Country : India	Postcode : 410 203 Maharashtra
Telephone : +91 2192 391 300	Fax : +91 2192 391310
Company Representative Name : Mr A K Singh	
Email : aksingh@positivepackaging.com	

Key Personnel

Name/Job Title	Present at Audit (x)			
	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings				
N Narkhede – Sr, GM Operations	X			X
V Balaji – VP Operations	X			X
A Kale - Director	X			X
R Nagle – GM Operational Excellence	X			X
A K Singh – GM R&D and Technical Services and Designated Manager	X	X	X	X
V Chitnis – GM HR and Admin	X			X
A Bajjal – Head Supply Chain	X			X
S Bohle – Manager Printing /Ink/Cylinder	X	X		X
M Jadhav – Manager Ink	X			X
M Bajaj – Consultant Paradigm	X	X	X	X
J Paiva – Assistant Manager QMS & Designated Deputy Manager	X	X	X	X
M Gaikwad – Manager HR & Admin	X			X
P Perumal – AGM QA	X			X
Vishwas Gore – AGM Customer Services	X		X	X
Y Khanna – AGM Lamination and Finishing	X			X
D Nachare – Manager Lamination	X	X		X
S Dighe – Manager Slitting	X			X
S Bagchi – Manager Purchasing & RMS	X		X	X
D Chake – Manager Pouch Area	X			X
C Karnik – Manager Shrink Sleeves	X			X
S Pagare – Manager Training	X			X
A B Jadhav – Manager Extrusion Lamination	X	X		X
U S Gupta – AGM Extrusion	X			X
C Uchil – Manager Packing & Dispatch	X			X

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 6 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

Audit Duration Details
On-site audit duration 6 Man Hours
Duration of production facility audit 20 Man Hours
Reasons for deviation from typical (12 hours) or expected on-site audit duration or typical (3 hours) site inspection duration. There are two separate manufacturing operations on the same site employing approx. 1000 people, and this was the company's first audit to version 4 of the Packaging standard.

Audit Duration per day		
	Start time	Finish time
Day 1	10:00	20:00
Day 2	9:00	19:00

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 7 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

Detailed Audit Report

BRC Requirement No.	REQUIREMENT	Conforms	Details
		Y, N or N/A	

1 SENIOR MANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT

1.1 Product Safety and Quality Management System

Statement of Intent	The company's senior management shall develop and document a product safety and quality management policy, which is authorised, reviewed, signed and dated by an appropriate senior manager.	Y	<p>Quality policy is in place and has been signed by the MD & CEO issue no 3 dated 15/10/2011. The company's commitment to continual improvement is demonstrated by the fact that:</p> <ul style="list-style-type: none"> - It's the first company in India to introduce extrusion. - Also due to a shortfall in capacity relating to demand the company has employed external consultants to help tackle this issue. <p>The policy is displayed in several locations around the site.</p>	
	1.1.1	Y	1.1.2	Y

1.2 Senior Management Commitment

FUNDAMENTAL

Statement of Intent	The company's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging and Packaging Materials. This shall include provision of adequate resources, effective communication and systems of management review to effect continual improvement. Opportunities for improvement shall be identified, implemented and fully documented.	Y	
1.2.1	The company's senior management shall ensure that product safety and quality objectives are measurable, established, documented, monitored and reviewed.	Y	Product safety and quality objectives are established and are monitored and measured on a regular basis.
1.2.2	The company's senior management shall provide the human and financial resources required to implement the processes of the quality management system and product safety programme.	Y	<p>The company's senior management have provided human and financial resources as demonstrated by:</p> <ul style="list-style-type: none"> - The purchase of a new laminator arriving in April 2012 - Looking at increasing the capacity of the warehouse <p>All the initiatives to date have been approved by management</p>
1.2.3	Clear communication and reporting channels shall be in place to report on and monitor compliance with the Standard.	Y	Clear communication channels are in place as demonstrated by the reporting structure on the company organogram
1.2.4	The company's senior management shall have a system in place to ensure that the company is kept informed of all relevant legislative requirements in the country of manufacture and, where known, the country in which the packaging material will be sold. The company shall also be aware of any scientific and technical developments and industry codes of practice applicable.	Y	The Company is a member of the National Safety Council in India and is kept aware of legislative requirements in countries where the product is sold. Legislative and legal requirements are covered by ref to FDA requirements, ref CFR Title 21 177 1520, EEC 85/572 with records for migration, heavy metals etc.
1.2.5	The company shall ensure that the materials manufactured comply with the relevant legislation (including any legislation concerning the use of recycled content) in the country of manufacture and in which the products are intended to be sold and/or ultimately used, where known.	Y	Materials comply with the legislations in the countries sold
1.2.6	The company's senior management shall ensure that non-conformities identified at the previous audit against the Standard are effectively actioned.	Y	Report seen for audit carried out last year, showing all non-conformities had been successfully closed
1.2.7	The company shall have a current, original copy of the Standard available on site.	Y	A copy of the current standard was used throughout the duration of the audit

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 8 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

1.2.8	Where the company is certificated to the Standard they shall ensure that recertification audits occur on or before the audit due date indicated on the certificate.	Y	Recertification audit is before audit due date
-------	---	----------	--

1.3 Organisational structure, responsibilities and management authority

Statement of Intent	The company shall have a clear organisational structure and define the responsibilities, reporting relationships and job functions of those personnel whose activities affect product safety, legality, regulatory compliance and quality.	Y	Organisation chart showing the structure of the company is in place ref "Org Chart – Khopoli" Manager responsible for compliance with the standard is A K Singh (GM R&D and Technical Services), and deputy is J Paiva (Assistant Manager QMS) Roles and responsibilities are in place for all employees, and samples seen were up to date. All senior managers have deputies in place to cover for absence ref document "PIQHMM"	
	1.3.1	Y	1.3.2	Y
	1.3.3	Y	1.3.4	Y
	1.3.5	Y		

1.4 Management Review

Statement of Intent	The company's senior management shall ensure that a management review is undertaken to ensure that the product safety and quality programme is fully implemented, effective and that opportunities for improvement are identified	Y	Last management review was conducted on 14/10/11, and is done on quarterly basis, and is well documented. The review process includes all the items indicated in clause 1.4.2 e.g. pending points raised from previous meeting which were still outstanding had "new" target dates set for completion. All personnel have access to the internet for minutes of management meetings etc. but are not permitted to change anything	
	1.4.1	Y	1.4.2	Y
	1.4.3	Y	1.4.4	Y
	1.4.5	Y		

2 HAZARD AND RISK MANAGEMENT SYSTEM

2.1 Hazard and risk management team

Statement of Intent	A multidisciplinary hazard and risk management team shall be in place to develop and manage the hazard and risk analysis system and ensure this is fully implemented.	Y	There is a multi-disciplinary team in place consisting of members from different departments e.g. General Manager (Operations and R & D), Extrusion Lamination, Assistant Manager QMS who reports to R & D General Manager. In total there are 16 members involved from different parts of the process. The company has employed external consultants to help set up the HACCP. Day to day management is the responsibility of the Team Leader (General Manager Operational Excellence). Training Feedback seen on Form CHR-F-01/32, training done on BRC/loP Global Standard for Packaging and Packaging Materials Since the last audit the company has added a new printing machine and the HACCP has been revised accordingly.	
	2.1.1	Y	2.1.2	Y
	2.1.3	Y		

2.2 Hazard and Risk Analysis

FUNDAMENTAL

Statement of Intent	A formal hazard and risk managements system shall be in place to ensure that all hazards to product safety and integrity are identified and appropriate controls established.	Y	
2.2.1	The scope of the hazard and risk analysis shall be clearly defined and shall cover all products and processes included within the intended scope of certification.	Y	The scope of the hazard and risk analysis has been revised and covers all products and processes e.g. the production of PE film has got "in-house" as it is no longer sent externally.

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 9 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

Audit Report

2.2.2	<p>The hazard and risk analysis team shall maintain awareness of and take into account:</p> <ul style="list-style-type: none"> historical and known hazards associated with specific processes, raw materials or end use of the product relevant codes of practice or recognised guidelines legislative requirements. 	Y	<p>The hazard and risk analysis team maintains awareness of:</p> <ul style="list-style-type: none"> the hazard and risk has been reviewed and now includes more detail. The company has updated the system from 2 to 4 CCP's. the company has taken into account the relevant codes of practice and guidelines as per industry standard legislative requirements are covered via head office
2.2.3	<p>A full description of the product shall be developed, which includes all relevant information on product safety and integrity. As a guide this may include:</p> <ul style="list-style-type: none"> composition, e.g. raw materials, inks, varnishes, coatings and other print chemicals origin of raw materials including use of recycled materials intended use of the packaging materials and defined restrictions on use; for instance, direct food contact, physical or chemical conditions. 	Y	<p>A description of the product is in place, an example is shown below:</p> <ul style="list-style-type: none"> Composition e.g. CPP/BOPP/PET/MET PET/solvents/Inks etc. The origin of the material is stated as Indigenous and imported, except in-house blown PE The intended use is for Food/non-Food and Industrial application (e.g. cement, lubrication oil, spare parts etc.)
2.2.4	<p>A process flow diagram shall be prepared for each product, product group or process. This shall include each process step from the receipt of raw materials to despatch to the customer.</p> <p>The process flow shall as a guide include, as relevant:</p> <ul style="list-style-type: none"> receipt and approval of art work receipt and preparation of raw materials such as additives, inks and adhesives each manufacturing process step the use of rework and post-consumer recycled materials any sub-contracted operations customer returns. <p>The accuracy of the process flow shall be verified by the hazard and risk analysis team.</p>	Y	<p>A process flow diagram has been created for each product and process from raw material to finished product e.g.</p> <ul style="list-style-type: none"> Receipt and preparation of raw materials Each manufacturing step Customer returns etc. The accuracy of the process flow has been verified by the whole of the HACCP team
2.2.5	<p>The hazard and risk analysis team shall identify and record all potential hazards that are reasonably expected to occur at each step in relation to the product and process. The hazards considered shall include, where relevant:</p> <ul style="list-style-type: none"> microbiological foreign objects chemical contamination (e.g. taint, odour, allergen, component transfer from inks, varnishes and glues) potential problems arising from the use of recycled materials legality defects critical to consumer safety hazards that may have an impact on the functional integrity and performance of the final product in use. 	Y	<p>The hazard and risk analysis team has recorded all potential hazards e.g.</p> <ul style="list-style-type: none"> Foreign objects e.g. wood splinters Chemical contamination e.g. grease, moisture Legality Hazard impacting performance and integrity of Inks
2.2.6	<p>The hazard and risk analysis team shall identify control measures necessary to prevent, eliminate or reduce each hazard to acceptable levels.</p> <p>Where control is through a prerequisite programme these shall be reviewed to ensure they adequately control the risk identified and where necessary improvements implemented.</p>	Y	<p>The team has identified control measures to prevent or eliminate the hazards. This has been covered in the Hazard and Risk Management Plan dated Sept 1st 2011.</p>

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 10 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

2.2.7	For each hazard that requires control, other than by an existing prerequisite programme, the control points shall be 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 shall be those control points that are required to prevent, eliminate or reduce a product safety or integrity hazard to acceptable levels. Where controls are not classified as critical and control may be achieved through a prerequisite programme, a programme shall be developed that is sufficiently specified to effectively control the identified hazards.	Y	The hazard and risk analysis has identified pre-requisite programs where required and CCP's, based on the level of risk and severity The company has identified 4 CCP's <ul style="list-style-type: none"> - Back pressure on co-extrusion - Odour after printing - Odour after lamination - Delamination after curing
2.2.8	For each critical control point, the appropriate critical limits shall be defined in order to identify clearly if the process is in or out of control. Critical limits shall be measurable where possible and the rationale for their establishment clearly documented. Relevant legislation and codes of practice shall be taken into account when establishing the limits.	Y	The CCP's have been identified and are measurable and clearly documented e.g. <ul style="list-style-type: none"> - On odour GC test has to be 02/20 - Back pressure the pressure has to be below 600 bar.
2.2.9	For each critical control point a monitoring system shall be defined in order to ensure compliance with critical limits. Records of the monitoring shall be maintained. Procedures relating to the monitoring of critical controls shall be included in internal audits against the Standard (refer to clause 3.3).	Y	CCP's have a monitoring system in place and are measured at regular intervals <ul style="list-style-type: none"> - Procedures are in place for all 4 CCP's e.g. PPRD-W-01/04
2.2.10	The corrective action that shall be taken when monitored results indicate a failure to meet the control limit shall be established and documented. This shall include the procedures for quarantining and evaluating potentially out of specification products to ensure they are not released until their safety can be established.	Y	There is a quarantine procedure in place ref PNCP-P-01
2.2.11	A review of the hazard and risk management system shall be carried out at least once per year and following any significant incidents or when any process changes. The review shall include a verification that the hazard and risk analysis plan is effective and may include a review of: <ul style="list-style-type: none"> • complaints • product failures • recalls • product withdrawals • results of internal audits of prerequisite programmes • results from external third-party auditors. 	Y	The hazard and risk management system was last reviewed on 1 st of Sept 2011 and signed by all members of the hazard and risk management team, and review includes all the items listed

2.3 Exemption of requirements based on risk analysis

Statement of Intent	The site has demonstrated adequate compliance with the requirements of this clause.			N/A	
	2.3.1	N/A	2.3.2	N/A	No exemptions to the standard

3 PRODUCT SAFETY AND QUALITY MANAGEMENT SYSTEM

3.1 Product safety and quality manual

Statement of Intent	The company shall have a manual which describes how the requirements of the Standard are met. These requirements shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary.			Y	The product safety and quality manual contains a list of procedures. The manual refers to section 3.1, 3.6 and 3.8 of the BRC manual. The manual is on pdf format on the company system, and is accessible to all personnel
	3.1.1	Y	3.1.2	Y	

3.2 Customer focus and contract review

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG			Auditor: Anis Munshi		
P026 Issue: 4	Page 11 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4		

Audit Report

Statement of Intent	The company's senior management shall ensure that processes are in place to determine customer needs and expectations with regard to quality and safety and ensure these are fulfilled.	Y	The company has identified personnel responsible for communication with customers i.e. the Assistant General Manager. Communication is via email, hard copy, phone, and face to face visits. There is a procedure in place for product development and scale up ref PRND-P-01. An example was seen relating to a product. New order CD received from customer, pdf is sent for approval, cylinder spec produced, sample produced and sent to customer, customer provides feedback on trials, and once approved leads to the job ticket being raised. Cylinder approval is considered as an approval of design all subsequent jobs will be treated as repeat jobs. Company in contact with customers via satellite offices Who handle changes in contract tender once a year, and reviewed every quarter	
	3.2.1	Y	3.2.2	Y
	3.2.3	Y		

3.3 Internal audits

FUNDAMENTAL

Statement of Intent	The company shall audit those systems and procedures which cover the requirements of the Standard to ensure they are in place, appropriate and complied with.	Y	
3.3.1	Internal audits shall be planned and their scope and frequency shall be established in relation to the risks associated with the activity. Audits shall be scheduled so that all aspects of the Standard are audited at least annually.	Y	Internal audit procedure in place ref PAUD-P-01. The internal audits are planned to occur once per month (23 per month covering all areas) and records were seen.
3.3.2	Internal audits shall be carried out by appropriately trained competent personnel who shall be sufficiently independent from the department being audited to ensure impartiality.	Y	Five employees have been trained to perform internal audits, by and external company Det Norske Veritas (DNV). They were given 2 days Internal auditor training on "Quality Management system as per ISO 9001:2008 Standard" on 30/11/2009 and records were seen. Personnel conducting audits are independent of the areas being audited.
3.3.3	Deficiencies and details of non-conformities shall be notified to appropriate supervisory staff and corrective action implemented within a specified and appropriate time period.	Y	Deficiencies and details of non-conformities are raised and relevant personnel informed, with a specified time scale for completion ref PAUD-F-01/02
3.3.4	The completion of corrective action shall be recorded and verified.	Y	The corrective action is recorded and verified
3.3.5	Internal audit reports shall be sufficiently detailed to ensure that conformity as well as non-conformity can be clearly identified and verified.	Y	Internal audit reports record both conformity and non-conformities

3.4 Supplier approval and performance monitoring

Statement of Intent	The company shall operate procedures for approval and monitoring of its suppliers. This shall include suppliers of materials and services to the company and ensure that materials and services procured conform to defined requirements.	Y	The company has a supplier procedure in place ref "Selection, Evaluation and Re-evaluation of Suppliers" (PPUR-P-01), and uses approx.12 suppliers The company uses an assessment system to approve suppliers and two supplier documents were seen e.g. (Cosmo films, Max India). The assessment is based whether the company has BRC or ISO, otherwise a self-assessment questionnaire or audit is conducted by the company There is supplier audit plan in place for 2011 – 2012. Exceptions are handled by the company requesting supply of C of A, or C of C	
	3.4.1	Y	3.4.2	Y
	3.4.3	Y	3.4.4	Y

3.5 Subcontracting of production

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 12 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

Statement of Intent	Where production processes are subcontracted this shall be with the agreement of customers. Procedures shall be in place for the effective control of subcontractors and the work undertaken.				Y	Subcontracting procedure in place ref PPUR-P-06 Metallising done by SAI Metaplast, and Multilayer PE films done by Supreme Industries SAI Metaplast has ISO 9001:2008, ref certificate no 9793-2007-AQ-IND-RvA ~Rev.03 Supreme Industries has BRC, ref certificate no 81156-2010-ABRC IOP-IND-SINCERT The risks to the product at sub-contractors has been taken into account as part of the hazard and risk analysis and checks are performed according to the specification (ref section 6.4.3 of the sub-contracting procedure) relating to the optical density
	3.5.1	Y	3.5.2	Y		
	3.5.3	Y	3.5.4	Y		

3.6 Documentation control

Statement of Intent	The company's senior management shall ensure that documented procedures and recording forms critical to the management of product safety, legality and quality are in place and effectively controlled.				Y	All documents in use are authorised and are the latest version as demonstrated by the issue number being updated e.g. from 2 to 3. There is a procedure in place ref PDOC-01. Accessibility to documents is via the company's computer system (read only), changes are controlled by QA (Mr Singh) There is a procedure to control obsolete documents where they are stamped obsolete and archived and removed from the system and replaced with the latest version
	3.6.1	Y	3.6.2	Y		
	3.6.3	Y				

3.7 Specifications

FUNDAMENTAL

Statement of Intent	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	
3.7.1	Specifications shall be suitably detailed, accurate and shall ensure compliance with relevant product safety and legislative requirements.				Y	Specifications: - are detailed, accurate and comply with relevant legislation - the specification is produced in-house based on the customer requirements e.g. Tesco XL Diamond Bottom Bag
3.7.2	The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed then the company shall be able to demonstrate that they have taken steps to put an agreement in place.				Y	The company gets formal agreement via email from the customer and a sample approval was email seen for Tesco XL Diamond Bottom Bag
3.7.3	A declaration of compliance shall be maintained, which enables users of the packaging materials to ensure compatibility with the product with which the materials may be in contact. The declaration of compliance shall contain as a minimum: <ul style="list-style-type: none"> the nature of the materials used in the manufacture of the packaging confirmation that materials meet relevant legal requirements the inclusion of any post-consumer recycled materials this shall identify any limitations of use of the declaration of compliance. Products shall meet at least minimum legal requirements in the country of manufacture and use, where known.				Y	The company gets the compliance details for the individual components from the supplier. Once the laminate has been made the company conducts its own tests using an external laboratory for compliance e.g. SIES School of Packaging test report seen for Migration on 15mic PVDC PET/50mic LLDPE Test report SOP/TR-127/11-12 The results of the test reports are collated and a "Food Grade Certificate" is sent to the company with the results. Sample seen for Cadbury India Limited and M/s Britannia Industries Ltd approved by the Head of Quality Assurance
3.7.4	Trademarks for application on packaging materials shall, where appropriate, be formally agreed between relevant parties.				Y	Trademarks are provided by the company

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG			Auditor: Anis Munshi		
P026 Issue: 4	Page 13 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4		

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

3.7.5	The company shall operate a specification review procedure.	Y	There is a specification review procedure in place ref PCPS-P-01, which indicates that the review should be done at least annually
-------	---	----------	--

3.8 Record Keeping

Statement of Intent	The company shall maintain records to demonstrate the effective control of product safety, legality and quality.	Y	Records are clear, well written and suitably authorised, and amendments are recorded with a reason for the change. The period of retention for records is dependent on the legal/regulatory, customer and company's own requirements (minimum 36 months). A procedure for control of records is in place ref PREC-P-01	
	3.8.1	Y	3.8.2	Y
	3.8.3	Y	3.8.4	Y

3.9 Traceability

Statement of Intent	The company shall have a system in place to identify product batches and to trace and follow all raw materials through processing to distribution of the finished product to the customer. Records shall be retrievable in a timely manner.	Y	
3.9.1	The company shall have a system that has the ability to trace and follow all raw materials from the supplier through all stages of processing to distribution of the finished product and vice versa. Where continuous processes are used or raw materials are in bulk, the traceability of silos shall be achieved to the best practical level of accuracy.	Y	There is a system in place which allows all materials to be traced through the different stages of processing. A traceability exercise was performed on a product selected at random
3.9.2	An appropriate system shall be in place to ensure the customer can identify a product or production lot number for the product, for the purposes of traceability.	Y	The customer is able to identify the product by providing either the purchase order no, process no or article no.
3.9.3	The system shall be tested to ensure traceability can be determined from raw material to the 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	A successful trace was conducted on process no T11J357, article no 0011729

3.10 Complaint handling

Statement of Intent	The company shall have a system for the effective capture, recording and management of product complaints.	Y	Complaints are recorded on a spread sheet, which is then classified according to severity e.g. critical, major or minor. A procedure is in place ref PMKT-P-02 Complaints are analysed on a monthly basis and a graph is produced to identify trends Complaints received are investigated and root cause identified and a solution put in place ref complaint seen for 2 foils returned by customer due to no coating. Company has now put in place a system where a label is applied to the rolls with "VMCH Coating Done".	
	3.10.1	Y	3.10.2	Y
	3.10.3	Y		

3.11 Management of incidents, product withdrawals and recalls

Statement of Intent	The company shall have a plan and systems in place to effectively manage incidents, product withdrawals and recalls, in order to ensure that all potential risks to the quality, hygiene and legality of products are controlled.	Y	Product recall procedure in place ref PPRC-P-01 A mock recall was conducted on 11/08/2011 with an external company (M/s General Mills) with all departmental heads from all areas being present. Customer informed that a mock recall was being done which was started at 15.25 and completed by 17.45, the test is done on an annual basis. The person responsible is Mr Singh. The product recall procedure can be operated at any time and all team members have contact numbers for the relevant personnel.	
	3.11.1	Y	3.11.2	Y
	3.11.3	Y	3.11.4	Y
	3.11.5	Y	3.11.6	Y

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 14 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

Audit Report

4 SITE STANDARDS

4.1 External standards

Statement of Intent	All grounds within the site shall be finished and maintained to an appropriate standard.				Y	The site is self-contained on a large industrial estate, with perimeter fencing all around. Suitable measures are in place to minimise impact on the local environment. The external areas are well maintained, and regular cleaning was seen being performed. The buildings are well maintained and proofed against pests. External routes are in suitable condition, and external storage of refuse is in designated places. Some full and empty gas cylinders were found strewn in parts of the external areas
	4.1.1	Y	4.1.2	N		There is no external storage of raw materials
	4.1.3	Y	4.1.4	Y		
	4.1.5	Y	4.1.6	N/A		
	4.1.7	Y				

4.2 Building fabric and interiors

Statement of Intent	The internal site, buildings and facilities shall be suitable for the intended purpose and shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.				Y	There are two manufacturing buildings in use and they are maintained in a good state, with no suspended ceilings in use in production areas. Lights with protective sleeving used to control breakages to enable work to be carried out, and all windows are suitably protected with the use of screens. Glass windows are protected and suitable ventilation is in place to provide a comfortable working environment
	4.2.1	Y	4.2.2	Y		
	4.2.3	Y	4.2.4	Y		
	4.2.5	Y	4.2.6	Y		
	4.2.7	Y				

4.3 Utilities

Statement of Intent	All utilities to and within the production and storage areas shall be designed, constructed, maintained and monitored to effectively control the risk of product contamination.				Y	Water testing is done monthly by an external lab called "Jubilant Pharma & Chemical lab" for bacterial count, coli forms, E-Coli, results were seen for 21/10/11 and found to be within the limits agreed Air compressor used (non-lubricated) for measuring atmospheric dew point: Green -20 deg Red -10 deg Recorded on an hourly basis and records seen for April to Nov 2011
	4.3.1	Y	4.3.2	Y		

4.4 Security

Statement of Intent	Security arrangements shall be assessed to ensure the integrity of products and processes.				Y	There is one entrance on to the site which is manned by security 24 hours a day. Access onto site is controlled by all employees having a swipe card for entry. Visitors and contractors have to report to security for an ID card prior to being let onto site. Reference checks are recorded from two sources one of which has to be from an independent person Access onto site for visitors/contractors is controlled and company personnel accompany them for the duration of their visit. The IT systems have security devices in place e.g. firewall, antivirus. All data is backed up every 3-4 hours and held at HQ. There is a data security policy in place ref PIT-W-01/01
	4.4.1	Y	4.4.2	Y		
	4.4.3	Y	4.4.4	Y		
	4.4.5	Y	4.4.6	Y		
	4.4.7	Y				

4.5 Layout and Product Flow

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG			Auditor: Anis Munshi		
P026 Issue: 4	Page 15 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4		

Audit Report

Statement of Intent	Premises and plant shall be logically designed, constructed and maintained. Procedures shall be in place to control the risk of product contamination and to comply with all relevant legislation.				Y	Process flow is designed to minimise the risk of contamination. There is sufficient working and storage area to provide a safe working environment. WIP is suitably identified, and sorting is done in the same area as manufacturing but segregated from production.
	4.5.1	Y	4.5.2	Y		
	4.5.3	Y	4.5.4	Y		
	4.5.4	Y				

4.6 Equipment

Statement of Intent	Equipment shall be suitably designed for the intended purpose and shall be maintained and used so as to minimise the risk to product safety, legality and quality.				Y	All equipment in use and being purchased is designed for the intended purpose. Equipment specification is raised prior to purchase e.g. new machine(EP3) specification was raised and signed by both the manufacturer and Positive Packaging . Notices are clean and secure
	4.6.1	Y	4.6.2	Y		
	4.6.3	Y				

4.7 Maintenance

Statement of Intent	A documented system of planned maintenance shall be in place, covering all items of equipment and plant that are critical to product safety, legality and quality.				Y	<p>Equipment, fixtures and fittings are maintained to minimise risks. A condition based preventative maintenance programme is in place. A preventative maintenance program is in place for each of the machines ref Cerruti – Printing -960-8C (EP1). The company holds a “daily review” meeting to highlight and implement potential improvements</p> <p>There is a procedure in place for maintenance ref PENG-P-01. There is a post maintenance checklist in place ref MNT-F-01/12.</p> <p>Wooden desks, chairs etc. are sealed properly and checked for splinters, damage etc. every 2 weeks.</p> <p>The company recently bought a new Cerrutti Printing machine in Feb 2011, as part of the installation a new maintenance program was put in place ref Cerrutti Printing -960-8C (EP3)</p> <p>Temporary engineering seen on all the old printing machines e.g.</p> <ul style="list-style-type: none"> - pipes feeding granule in to tote bins labelled using sellotape - cardboard used on ink trays to prevent splash back - cloth used to sieve adhesive stuck to collection unit using sellotape <p>Temporary engineering is not recorded and scheduled for correction</p>
	4.7.1	Y	4.7.2	Y		
	4.7.3	Y	4.7.4	Y		
	4.7.5	Y	4.7.6	N		
	4.7.7	Y	4.7.8	Y		
	4.7.9	Y				

4.8 Staff Facilities

Statement of Intent	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	Hand washing facilities and air-driers are provided in the toilets and at entry points to production. Disinfectant gels are located near each machine. Toilets are segregated and have warm running water, soap and driers. Lockers are accessed without the need to enter production, and provided for all personnel. Personal and protective clothing is not stored in the same locker. Eating, smoking etc. is in designated areas only. All food bought from home is stored in the canteen in a specified location. The site is non-smoking site, but a designated smoking area is provided outside the front gate with suitable waste-disposal containers.
	4.8.1	Y	4.8.2	Y		
	4.8.3	Y	4.8.4	Y		

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG			Auditor: Anis Munshi		
P026 Issue: 4	Page 16 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4		

Audit Report

	4.8.5	Y	4.8.6	Y
	4.8.7	Y	4.8.8	Y
	4.8.9	Y		

4.9 Housekeeping and Cleaning

FUNDAMENTAL

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	
4.9.1	Good standards of housekeeping shall be maintained, which shall include a 'clean as you go' policy.	Y	Good standard of housekeeping seen throughout both sites ref PCAT-W-01/02
4.9.2	All internal surfaces of buildings, equipment and vehicles shall be subject to documented scheduled cleaning. 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 and responsibility for verification. 	Y	Documented schedules were seen for a range of items Records were reviewed and compared with documented schedules and found to be in compliance General cleaning is the responsibility of house-keeping team, with operators cleaning processing equipment.
4.9.3	Cleaning equipment and materials shall be kept in a secure designated location such as a locked cupboard.	Y	Equipment is kept in a locked cupboard
4.9.4	Cleaning chemicals shall be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers' instructions.	Y	Chemicals used are fit for purpose and used as per instructions
4.9.5	Chemicals that are strongly scented or could give rise to taint and odour contamination shall not be used.	Y	None seen
4.9.6	Materials and equipment used for cleaning toilets shall be segregated from those used elsewhere.	Y	Red components for toilet are stored in specified location and the key is held by HR Green items are for production

4.10 Waste and waste disposal

Statement of Intent	Suitable facilities shall be provided for the storage and disposal of process and other waste.	Y	Sufficient waste containers seen around site suitably labelled. All items which are surplus or incorrect are shredded, ref procedure in place PSWD-P-01. Trademarked material is not transferred to 3 rd for destruction without shredding or disposing	
	4.10.1	Y	4.10.2	Y
	4.10.3	Y	4.10.4	Y
	4.10.5	Y		

4.11 Pest control

Statement of Intent	The company shall be responsible for minimising the risk of pest infestation on the site.	Y	A preventive pest control programme is in place ref procedure PCAT-P-04. The company uses an external company called PCI, Licence no 1/2114/291 valid from 5/2/10 to 4/2/12. The company visits twice a month or quarterly depending on the activity. There is a map available showing locations of EFK's, baits for mice, and external baits dated 5/5/2011. In the event of infestation a catch analysis is done. Details of pest control products used are: Delamethrin, Bromaiodinelone, Cyphenothrin Safety data sheets for the products used were seen Detailed records of pest activity are maintained and were examined and found to be up to date.	
	4.11.1	Y	4.11.2	Y
	4.11.3	Y	4.11.4	Y
	4.11.5	Y	4.11.6	Y

4.12 Transport, storage and distribution

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 17 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

Statement of Intent	The transport, storage and distribution of raw materials and finished products shall be undertaken in a manner to minimise the risk of contamination or malicious intervention.	Y	All finished product is placed inside a box, and identified with a label containing the product code, name, batch number etc. All pallets are checked to ensure they are not damaged or contaminated, wooden pallets used in production have a plastic sheet on them before corrugated box with finished goods is placed on top Work in progress is suitably labelled to prevent cross contamination. Vehicle drivers comply with site rules and trucks are checked prior to loading. There is an agreement in place with 3 rd party contractors (approx. 20) agreement seen for Narayan Damodar Naik, Shirish Cargo Services. Sample of truck hygiene records seen and found to comply for vehicles, and QA container checklist	
	4.12.1	Y	4.12.2	Y
	4.12.3	Y	4.12.4	Y
	4.12.5	Y	4.12.6	Y
	4.12.7	Y	4.12.8	Y
	4.12.9	Y	4.12.10	Y
	4.12.11	Y	4.12.12	Y
	4.12.13	Y		

5 PRODUCT DESIGN AND PROCESS CONTROL

5.1 Product design and development

Statement of Intent	Product design and development processes shall be in place to ensure the production of safe and legal products to defined quality parameters.	Y	Customer design requirements are agreed prior to undertaking product design Final product concept art work is formally agreed with the client. Specifications for each process stage are created to ensure product safety, legality etc. are covered. Final product concepts are agreed via email or by approval on line etc. Production trials are performed when a new product is being developed by the R & D department in conjunction with production and the customer	
	5.1.1	Y	5.1.2	Y
	5.1.3	Y	5.1.4	Y
	5.1.5	Y	5.1.6	Y

5.2 Packaging print control

Statement of Intent	Where packaging is printed with allergen/safety/legal information, procedures shall be in place to ensure that the information is fully legible and correctly printed to the customer's specification.	Y	Print one product at a time and a line clearance is done, prior to starting another product. All materials used e.g. printing plates etc. are fully traceable. Plates are suitably stored and samples are kept to be used as standards. Each print run is matched against the agreed colour standard. Production samples are kept for a set period or until the next production run. All personnel on the line are trained as well as QA personnel who carry taught the final checks. Light bulbs used in the production area are changed after 2000 units of use	
	5.2.1	Y	5.2.2	Y
	5.2.3	Y	5.2.4	Y
	5.2.5	Y	5.2.6	N/A
	5.2.7	Y	5.2.8	Y
	5.2.9	Y	5.2.10	N/A

No composite printing is used
No request from customers for inspection cabinets

5.3 Process control

Statement of Intent	Procedures shall be in place to ensure effective quality assurance of operations throughout the process.	Y	
5.3.1	The company shall undertake a review of the manufacturing and, where applicable, printing process to identify critical manufacturing process control points that could affect the quality of the products produced.	Y	The company has recently undertaken a review of the manufacturing and printing processes and revised the number of CCP's from 2 to 4

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG		Auditor: Anis Munshi	
P026 Issue: 4	Page 18 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

5.3.2	For each critical manufacturing process control point, machine settings or process limits shall be established and documented – the process specification.	Y	For each of the 4 CCP's the process limits have been established and documented ref section 2 (HACCP)
5.3.3	Documented process checks shall be undertaken at start up, following adjustments to equipment, and periodically during production, to ensure products are consistently produced to the agreed quality specification.	Y	Checks are undertaken on the set up sheet, during production, and on completion of the job.
5.3.4	A clearance procedure shall be in place to ensure that at start up, the line is clear of all previous work and production documents.	N	Line clearance procedure in place on "Bimac 5", but results had not been verified by QA
5.3.5	Suppliers of incoming materials, as appropriate, shall provide evidence of conformity.	Y	Suppliers provide certificate of conformance with materials
5.3.6	Quality checks shall be carried out to demonstrate that the finished product is within the tolerances laid down in the agreed product specification and conforms to any critical technical/legal requirements.	Y	Quality checks are performed by production personnel at each stage, and verified by the on-site QA laboratory. Checks conducted include dimensions, colour, text, registration etc. Quality checks seen for "Bil Nuirtrichoice" PQAD-F-02/01
5.3.7	In the event of changes to product composition, processing methods or equipment, the company shall, where appropriate, re-establish process characteristics and validate product data to ensure product safety, legality and quality are achieved.	Y	Prior to any changes being made the company performs trial runs, followed trials in production. Samples are approved by the customer before any changes are implemented

5.4 Product inspection and analysis

Statement of Intent	The company shall use appropriate procedures and facilities when undertaking or subcontracting inspection and analyses critical to product safety, legality and quality.	Y	Quality checks are performed at different stages of the process against the agreed specification. Checks are performed to industry standards. All physical testing is conducted by the on-site laboratory and methodology of testing is well documented. Microbiological testing is undertaken by Microchem pvt ltd Leak test procedure does not indicate the pressure at which the test is to be performed	
	5.4.1	Y	5.4.2	Y
	5.4.3	N	5.4.4	Y
	5.4.5	Y		

5.5 In-line testing and measuring equipment

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.	N/A		
	5.5.1	N/A	5.5.2	N/A
	5.5.3	N/A	5.5.4	N/A
				Not Applicable as no in-line testing is done

5.6 Calibration

Statement of Intent	Measuring equipment used to monitor critical manufacturing process points and product safety and legality shall be calibrated.	Y	A well controlled calibrating systems in use, traceable to national standards. Measuring equipment is checked and adjusted at pre-determined frequency by internal trained personnel and by external companies operating to recognised in e.g. Micrometer (ref 2/20): 1/4/11-1/4/12 Vernier (ref 3/09): 1/6/10-1/6/11 Height guage (ref 4/02): 4/6/11 – 4/6/12 Only qualified trained staff or external calibration agencies are permitted to adjust the measuring tools and equipment. Measuring equipment is suitably protected to prevent misuse	
	5.6.1	Y	5.6.2	Y
	5.6.3	Y	5.6.4	Y
	5.6.5	Y		

Audit Report

5.7 Control of non-conforming product

Statement of Intent	The company shall ensure that out-of-specification product is clearly identified, labelled and quarantined.			Y	Procedure are in place indicating that clear labelling of NCP is required, and subsequent removal to designated quarantine area from which it may not be removed without senior management authorisation, based on results of investigation and laboratory inspection. Corrective action is implemented to avoid re-occurrence
	5.7.1	Y	5.7.2	Y	
	5.7.3	Y			

5.8 Foreign body contamination control

Statement of Intent	All practicable steps shall be taken to identify, avoid, eliminate or minimise the risk of foreign body contamination.			Y	
---------------------	--	--	--	----------	--

5.8.1 Foreign body control

	5.8.1.1	Y	5.8.1.2	Y	There is a glass and brittle plastics register in place for Unit 1 and 2, and also high level breakables register in Unit 1. Ref PCAT-F-03/02 Every window and lamp-fitment is individual numbered for identification and audited quarterly. Status of machine items and glasses is verified on daily cleaning / Pre-start records. Random sample selected seen for July 2011 found to be up to date
	5.8.1.3	Y	5.8.1.4	Y	
	5.8.1.5	Y			

5.8.2 Sharps control

	5.8.2.1	Y	5.8.2.2	Y	There is a documented policy for sharps in place, and no tools or blades were observed which could contaminate the product. The company does not permit the use of snap of blades No loose fastening items were seen There is no record indicating which personnel have sharps
	5.8.2.3	N	5.8.2.4	Y	
	5.8.2.5	Y			

5.8.3 Chemical and biological control

Statement of Intent	Controls shall be in place to prevent contamination from chemical or biological hazards.			Y	Chemicals and cleaning materials are stored in a specified location and secured with Admin and HR in possession of the key. Glue used is CAC SF11 (from Henkel) which is a two component solvent-free laminating adhesive. Safety data sheet indicated harmful by ingestion and possible irritation Industrial multipurpose grease E, health and safety indicates "unlikely to present any significant health or safety hazard when used properly" Shell Omala Oils used, no specific hazard under normal conditions
	5.8.3.1	Y	5.8.3.2	Y	

6 PERSONNEL

6.1 Training and competence

Statement of Intent	The company shall ensure that all employees are adequately trained, instructed and supervised commensurate with their activity and are competent to undertake their job role.			Y	
---------------------	---	--	--	----------	--

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG			Auditor: Anis Munshi		
P026 Issue: 4	Page 20 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4		

This report shall not be reproduced in part without the permission of NB Certification

Audit Report

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	All personnel are suitable trained in the printing and lamination areas, records were seen for five personnel and found to be up to date e.g. fire and safety, colour management, Quality and hygiene training, refresher for BRC training, printing trouble shooting and defect analysis, monitoring of CCP's etc. Contract workers are also trained e.g. working instruction for packaging seen
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	The competencies of personnel is reviewed on a quarterly basis. The review covers all the relevant areas e.g. HACCP, safety, quality assurance etc.
6.1.3	Records of training shall be kept for all current and recent key employees.	Y	Records were seen for several employees selected at random from different departments e.g. M Shethe (printing), A Awale (blown film), M Dhene (packing)
6.1.4	A programme of refresher training shall be in place.	Y	A refresher training programme is in place and records were seen showing training provided in fire & safety, first aid, visitor introduction on site etc.
6.1.5	The company shall document training procedures and records to demonstrate that training is effective and regularly reviewed.	Y	Training procedures and records are documented as indicated in 6.1.3

6.2 Access and movement of personnel

Statement of Intent	The company shall ensure that access and movement of personnel, visitors and contractors shall not compromise product safety and quality.			
	6.2.1	Y	6.2.2	Y
	6.2.3	Y		
	Site plan is in place indicating access points, travel routes etc. and dedicated walkways with adequate segregation from materials. Facilities have been designed to enable logical movement of personnel			

6.3 Personal hygiene

Statement of Intent	The company's personal hygiene standards shall be documented and adopted by all personnel, including visitors to the production facility. These standards shall be developed with due regard for risk of product contamination.				Y	There is a jewellery policy in place ref V4. No mobile, jewellery etc. with the exception of plain wedding ring is permitted in production. Procedure for personal medicine indicates that it is not permitted in manufacturing and storage areas. All visitors and contractors are required to follow the company hygiene rules otherwise they are not permitted to enter the production areas.
	6.3.1	Y	6.3.2	Y		
	6.3.3	Y	6.3.4	Y		
	6.3.5	Y	6.3.6	Y		
	6.3.7	Y	6.3.8	Y		
	6.3.9	Y				

6.4 Medical Screening

Statement of Intent	Health conditions likely to adversely affect product safety shall be monitored and controlled.				Y	There is a procedure in place ref PIQHMM - 01 There is a doctor who is based on site. All personnel report to him if they are feeling ill or returning from sick leave, prior to going into the production environment. All employees have to undergo a medical examination on annual basis Blue plasters are available for cuts and grazes, and are issued and monitored by the company
	6.4.1	Y	6.4.2	Y		
	6.4.3	Y				

6.5 Protective clothing

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG			Auditor: Anis Munshi		
P026 Issue: 4	Page 21 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4		

This report shall not be reproduced in part without the permission of NB Certification

**P026: Global Standard for Packaging and Packaging Materials Issue 4
February 2011**

Audit Report

Statement of Intent	Appropriate protective clothing shall be worn in production and storage areas to minimise the risk of product contamination.				Y	Two sets provided tops, trousers, socks and shoes, disposable hats. A policy is in place for the wearing of snoods and hats in production. Clean and dirty clothing are segregated via the use of split lockers. Staff are required to launder their own Company-issued clothing at home in accordance with documented guidance (PCAT-W-01/01). Personnel seen walking outside of production areas with protective clothing on
	6.5.1	Y	6.5.2	Y		
	6.5.3	Y	6.5.4	N		
	6.5.5	Y	6.5.6	Y		
	6.5.7	Y	6.5.8	Y		
	6.5.9	Y	6.5.10	Y		
	6.5.11	Y				

NB Certification, Santia House, Caerphilly Business Park, Caerphilly, CF83 3GG			Auditor: Anis Munshi		
P026 Issue: 4	Page 22 of 22	Report No: 1085466	Global Standard for Packaging and Packaging Materials – Issue 4		

This report shall not be reproduced in part without the permission of NB Certification