Audit Report

Global Standard Packaging Materials Issue 6: August 2019

Audit summary			
Company name	Film and Foil Solutions Ltd	BRCGS site code	7725375
Site name	Haydock		
Scope of audit	Perforation, macro punching, folding, slitting and rewinding (Outsourced print process) of OPP, BOPP and PET film onto reels. The slitting and rewinding of Kraft paper onto reels for food, consumer and retail products (Contact and non-contact).		
Scope exclusions	OPP, BOPP and PET, reel film differentiated by supplier branded outer packaging and product codes.		
Justification for exclusion	Purchased and sold on without site intervention.		
Start date	2021-02-11	Finish date	2021-02-12
Re-audit due date	2022-02-11	Previous audit date	2019-07-02

Additional modules included			
Modules	Result	Scope	Exclusions from Scope
Choose a module	Choose an item		
Choose a module	Choose an item		

Audit results			
Audit result	Certificated	Audit type	Remote
Audit grade	AA	Previous audit grade	AA
Certificate issue date	Select a date	Certificate expiry date	2022-03-25

Number of non-conformities		
	Major against SOI of Fundamental	0
	Critical	0
	Major	0
	Minor	2

Company details			
Address	North Building North Florida Road Haydock WA11 9UB		
Country	United Kingdom	Telephone	44 01942 727151
Commercial representative Name	Steven Walsh	Email	steven@filmfoil.com
Technical representative Name	Steven Walsh	Email	steven@filmfoil.com

Company profile					
Plant size (square metres)	<10K sq.m	No. of employees	1-50	No. HARA Plans	1-3
Subcontracted activities	No				
Outsourced processes	Yes				
Other certificates held	None				
Regions exported to	None Choose an item. Choose an item. Choose an item. Choose an item.				
Major changes or auditor observations since last BRCGS audit	No major changes since the last audit.				
Company description	The site is privately owned and was originally set up to provide over winding film tape for the electrical component industry before expanding into the food and consumer sectors. There is a dedicated and experienced Management Team at site, and this is reflected by the ongoing success and development of the plant. The nature of the business is the perforation, slitting and rewinding of a range of purchased films for food, consumer and retail products customers on 1 slitting machines, 2 with hot needle perforation unit and one with a punch				

Company profile	
	unit. The site infrastructure is very well maintained and is entirely suitably for the BRC high hygiene risk category as products manufactured at the site do come into direct food contact. To this end, the site has now been audited and approved for supply to Tesco. The site is 2,770 square metres in size. There are 29 employees working a 2-shift system with 20 on site at one time. The company has developed procedures and systems that are in compliance to meet the requirements of the BRCGS Packaging Materials.

Product and process characteristics	
Manufacturing Categories	02 - Papermaking 05 - Flexible plastics Please select Please select Please select
Products in production at the time of the audit	There were heat sealable lidding films for produce and bakery in production at the time of the site inspection.

Audit duration details			
On-site duration	12 hours	Duration of production facility inspection	4 hours
Reasons for deviation	No deviation, P606 compliant		
Next audit type selected	Announced		

Audit Duration per day

Audit Day	Date	Start Time	Finish time
1	2021-02-11	09:00	17:00
2	2021-02-12	09:00	13:00

Auditor information		
Auditor number	Auditor Name	Role
110021	Paul Blake	Auditor
N/A		Please select

Present at audit
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings

Name/Job Title	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Dave Green – Operations Manager	X			X
Steven Walsh – Quality Manager	X	X	X	X
Keith Ogden - Consultant	X	X	X	X
Jason Butler – Machine Operator		X		

GFSI Audit History		
Date	Scheme/Standard	Announced/Unannounced

Template control	PackMat	Version	1.0

Non-Conformity Summary Sheet

Major non-conformity against statement of intent of a fundamental requirement				
No.	Clause	Detail	Critical or Major	Ant. re-audit date

Critical			
No.	Clause	Detail	Ant. Re-audit date

Major							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

If you would like to feedback comments on the BRCGS Standard or the audit process directly to BRCGS, please contact tell.brcgs.com

Minor							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by
1	4.1.3	Roller Shutter door in Keedwell Warehouse is not sealing properly and could allow pest ingress.	A Bristle strip has been fixed to the bottom of the roller shutter door to prevent pest ingress. See photo.	The installation of the new bristle strip will prevent future problems of the roller shutter door not sealing properly. Regular internal inspections by QM and also by Pest control contractors will be undertaken to assess this issue.	Neither the Pest contractor or our BRCGS consultant had noted the issue. As the building was only recently occupied by us, the roller shutter door had been in constant use as the warehouse was being loaded with materials at the time of the pest control inspection and consultant inspections and therefore the gap hadn't been noted.	2021-02-24	Paul Blake
2	4.8.2	Cleaning schedules do not contain the method of cleaning.	The cleaning schedules have been updated to include the cleaning method for Hygenol Guard. Attached pdf showing new text on a filled out cleaning schedule.	All the cleaning schedules have been re-issued with the text "Method for Hygenol Guard = Spray Hygenol Guard on the surface and wipe off with a clean cloth". All staff have been briefed in the new wording and information regarding this.	This was an oversight by the management team when the schedules were originated.	2021-02-24	Paul Blake

Comments on non-conformities
Click or tap here to enter text.

Additional Modules/Head Office Non-Conformity Summary Sheet

Critical			
No.	Clause	Detail	Re-audit due date

Major							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

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Minor							
No.	Clause	Detail	Correction	Proposed preventive action plan	Root cause analysis	Date reviewed	Reviewed by

Detailed Section

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

The site has documented both Quality and Hygiene Policy Statements which include a declaration that products produced are entirely safe and legal. The policies are reviewed every year at the annual Management Review Meeting. The policies are clearly displayed in the reception and are briefed to new starters during the induction process.
The site has a plan in place that shows the policy of holding regular toolbox briefs and the use of noticeboards that can be regularly monitored for content and measured for performance and a plan put in place to improve problem areas, on an rolling programme of improvements.
There are measurable objectives in place that are reviewed and re-set at the annual Management Review meetings. Examples of site objectives for 2021 are defined as follows: -

- Complaints to be reduced by 10% with a target of 17 over the next 12 months
- Achieve BRCGS certification to A grade or above
- Internal non cnformances to be reduced by 10% to an average of 3.375 per quarter
- Hygiene incidents to be 2 or less per year

There are other operational/departmental KPI's in place that feed into the main site-wide Quality objectives. Extensive trending is undertaken and documented monthly.
The site is run by a privately-owned company; the owners of the business have ensured resources are available to maintain and improve standards to meet customer requirements. There is dedicated BRCGS Resource provision on site in the form of the Technical Manager and Quality Assistant as BRCGS deputy. Technical Manager advises the site on legislative requirements. The Food Standards Agency are also consulted and also provide regular communications. Customers and suppliers are used as a source of information as and when necessary. Products sold conform to all relevant legislation. The Quality Co-ordinator regularly attends annual events to keep the site abreast of scientific developments. The site ensures materials are safe for use with food and has Declarations of Compliance in place which are sent to Customers on request. There is ongoing BRCGS support from an external consultant. Product Specification sheets are generated for all products manufactured at the site. Products are sold globally and conform to current legislation such as, but not necessarily limited to, EU 2019/37, EC1935/2004, EC 2023/2006. Suppliers Declarations of Compliance also confirm the above.
The site has a genuine electronic copy of the standard on site which is held by the Quality Manager. The site has a system to ensure re-certification occurs on or before the audit due date.
There were two non-conformances raised at the previous audit that were closed within the required timeframe using root cause analysis to determine the corrective and preventive actions to be implemented.
The Operations Manager was present at the opening and closing meeting. The site uses the BRCGS logo on its website and invoices and are compliant with the protocol (Part lll, section 5.6).

Audit Evidence;
Quality Policy Statement – signed by Managing Director, Ian Hillman, dated 2nd July 2020.
Quality Objectives 2019, documented June 5th 2021.
Electronic copy of Standard version 6.0

1.2	Management review

There are monthly and annual review meetings held on site. The last meeting was held 05.06.2021. The site has moved to reviewing objectives monthly and document the review of documentation as and when required. The meetings are chaired by the MD and other attendees were all members of the Senior Management Team. The Review meetings follow a pre-defined agenda which was compliant with the requirements of the standard including; -

- Minutes of the previous meeting
- Results of audits
- Customer performance indicators, complaints and feedback
- The effectiveness hazard and risk management system
- Impact of any applicable legislative and certification scheme changes
- Incidents, corrective actions, out specification results and non-conforming products
- Resource requirements
- Any objectives that have not been met, to understand the underlying reasons etc.
- The effective ness of the product defence and product fraud prevention plans

The meeting is documented, and the minutes sent out to all attendees with specific action points defined and timescales allocated as required through the action plan. Any issues of product safety, quality or safety can be brought to the attention of a senior manager through the management structure.

Audit Evidence;
Annual Management review meeting minute dated 05/06/2020

1.3	Organisational structure, responsibilities, and management authority

There is an organisational chart in place. Reporting channels are clearly defined on the charts. The Quality Manager and has overall responsibility for managing the BRCGS Standard on site with the Operations Manager as deputy in his absence. Operationally the chart starts at the Managing Director and is inclusive of all key personnel on site. Dept. Heads report to the Managing Director and include as examples the Finance, Technical and Operations Manager. Job descriptions are in place for key members of staff, and responsibilities and deputies are defined as part of the QMS.

Audit Evidence;
Organisation chart issue 3 dated 03/07/2020
Responsibilities procedure (for product safety, quality and legality) Issue 3 dated 03/07/2020

Non-applicable clauses	1.1.7, 1.1.9,

2.	Hazard and risk management

2.1	Hazard and risk management team

There is a multi-disciplinary H&RM Team in place at the site which has developed the system. The system is subject to continual management and review (at least annually).
The Team is led by the Quality Manager, other team members include; the Finance Assistant, Planner, Operations Manager, Warehouse Manager, Production Operative, Customer Service Representative and External Consultant.
The Quality Manager and the Quality and Hygiene Supervisor members have been formally trained in H&RM and training records are held on site. The other team members have been trained in-house. The team has extensive experience of food packaging manufacturing operations. There is external expertise used for the maintenance of the HARM System via the external consultant, Keith Ogden, who also conducted the HARM training

Audit Evidence;
HARM review dated December 2020.
HARM Plan Issue 5 dated 12/10/2020.
Harm training certificates for Warehouse Manager, Production Operative and Finance assistant from 26th – 27th August 2020.
Harm training certificates for Quality Manager, Operation Manager, 1st May 2018

2.2	Hazard analysis and risk assessment

There is a documented HARM system in place at the site. The system comprises control point steps controlled through various documented control measures in addition to documented pre-requisite programs.
The scope of the HARM System covers the conversion, by slitting, (sub-contract printing) re-winding, perforating, macro punching, and/or folding, of plastic film into film on reels, plus the storage, collation and distribution of "Pick and Pack" reels of plastic film. Film is used as direct food contact packaging, as packaging for food packaging products non-food products and for print finishing.
The system is designed to meet agreed customer expectations, and satisfies statutory, regulatory and safety expectations. The team is experienced and understand the potential industry hazards such as; - Microbiological, physical, chemical, potential for unintended migration, potential problems arising from the use of recycled materials, foreseeable misuse by the consumer, defects critical to consumer safety, hazards to product legality, etc. The study has identified the stages in the manufacturing process from definition of the product through delivery of raw materials in a process flow chart that has been validated by the HARM team 03.07.2020. The study considers all potential contamination sources throughout the various processes and the system has been developed to produce safe and legal products. The construction of the system has considered all relevant recognised guidelines and legislative requirements. All products are processed on site, with the exception of subcontracted printed film and sold within the UK. Product descriptions and intended use has been fully documented as part of the system. Materials used in the manufacturing process are defined as food grade contact standard.
Flow diagrams detail all processes for the site and are validated.
Verification of the process is carried out by the team on at least an annual basis or when changes to process or product produced are identified.
The site has identified and documented potential hazards and risks relating to all stages of the manufacturing processes undertaken on site, such as perforation, folding, slitting and rewinding, with Hazards are identified for each process step and associated defects such as poor perforation bad folding, incorrect slitting, poor rewinding. Risk is assessed by scoring likelihood and severity and using a risk matrix to define the outcome of low risk, medium risk or high risk. High risk hazards are put through the decision tree process to determine if they warrant CCP status. There are no CCP's that have been identified at the site. Hourly checks are recorded as part of the batch inspection records, and there are also end of shift and start of shift checks. Control measures have been identified for all hazards associated with the manufacturing process and include the use of a Pest Control contractor, visual checks on every delivery of Raw Material, approved Supplier use, visual checks before loading of Finished Product, Stock Control, GMP, Personal Hygiene, Site Security, Controls, Cleaning Schedules, PPM, Glass Management, Calibration Control, Protective Clothing and Q.C. Procedures. These are present in the form of PRP's and documented Work Instructions. The site has considered the requirement of P552, such as material substitution, malicious intervention, security.

Audit Evidence;
HARM Plan Issue 5 dated 12/10/2020.
Last HARM review dated December 2020.
Process Flow Chart Appendix 1, Signed by all members of the HACCP team, dated 03.07.2020.

Non-applicable clauses	2.2.9, 2.2.10, 2.2.11

3.	Product safety and quality management

3.1	Product safety and quality management system

There is a well-established, concise, detailed QMS in place, designed to meet the requirements of the BRC Packaging Standard. The QMS at the site is electronic and paper based and logically addresses the requirements of the standard. There is a combined Quality Manual in place which is version controlled. The QMS cross-references all the relevant Quality Procedures, Hygiene Procedures, Works Instructions, Forms, and SOP's necessary to implement the specific requirements. Key employees have read only access to the QMS documents held on the system which are held on Google Drive. The Quality Manager is authorised to make changes to the QMS documentation. High level changes are signed off by the Operations Manager. The QMS is reviewed on an on-going basis when any changes to systems or processes occur, or when there is a revision to the BRCGS or ISO Standards. The QMS is also reviewed at Management Review meetings, monthly and annually, and through the internal audit process.

Audit Evidence;
QMS system in electronic format.

3.2	Document control

The site has a documented procedure for the control of documentation. Document control protocol is title, issue number and date. Documents and records are controlled by the BRC Team. All changes must be formally authorised. The Quality Manager can make changes to the QMS documentation in collaboration with the process owners, but the authorisation of amendments and the issuing of new documents must follow site approval protocols and be authorised by nominated personnel. The reason for any changes to documentation is recorded on document revision version amendment sheet found at the back of the document or record. There are Document Master lists in place. Electronic documents are protected on password protected systems which incorporate anti-virus controls, and the documents are held on Google Drive. The computer system is centrally managed by the site's IT department. Information is backed up daily to cloud based storage.

Audit Evidence;
Document Control Procedure 3.2, Issue 2, dated 13/07/2020.
Document Master List 3.6, Issue 2 dated 05/01/2021.

3.3	Record keeping

The site has a documented procedure for the control of records. Hard copy records of quality inspections and approvals are held in bespoke job bags relevant to each order. Electronic records are backed up daily. Records and amendments are initialled or signed by the relevant Operator, Supervisor or Manager. The system is both computer and hard copy based. Records are stored suitably and are easily retrievable when required via Google Drive. Records pertaining to product safety, legality, and integrity are maintained. The retention time for records is defined as 2 years, however with cloud storage the term is essentially indefinite. Information is backed up daily to cloud based storage, via DNA software using online server system called UK Fast, and an onsite server, in addition to the documents held on Google Drive.

Audit Evidence;

Record Keeping Procedure 3.3, Issue 2, dated 13/07/2020.
Sampled various records as part of the traceability exercise referred to in section 3.9, and audit which included: but not necessarily limited to: Training records, cleaning records, maintenance records, process checks and quality inspections.

3.4	Specifications

Specifications are in place for Raw Material, Finished Product and Services. Specifications are generated by the Technical Manager after agreement with Customers on DNA System (the site's MIS). Specifications are suitably detailed and include composition and applications. Associated legislative requirements are detailed on the suppliers accompanying Declaration of Compliances. Finished product specifications also define compliance with legislative requirements. Specifications are formally agreed between the Customer and the company after the specification and design process has been completed and the specification, design or artwork has been signed off. Order acknowledgements/emails are sent to all customers for all orders prior to any production run taking place. The site ensures materials are safe for use with food and has Declarations of Compliance in place, which are sent to Customers on request. Declaration of Compliances are detailed and define all materials used in the manufacturing process, legislative compliance, product limitations and current migration information. The Statement of Compliance is dated 09/09/2020, referenced various compliances, such as, but not necessarily limited to 1935/2004, 2023/2006, 10/2011 including EC 1245/2020. The Statement of Compliance also makes reference to the use of post-consumer recycled material (none) in the composition of the Packaging. Manufacturer's trademarks and logos are currently not applied to the packaging. There is a specification review process in place. The order processing procedure entails conducting a specification review on each order by relevant internal depts. All changes or amendments to existing specifications are reviewed for consideration and possible implications. Specifications are also reviewed in collaboration with the Customer on an annual basis.

Audit Evidence;
Raw Material specification for OPLAR SCL (A01) General purpose BOPP Film, supplied by SRF, including various aprameters, such as but not necessarily limited to, Thickness, Grammage, tensile strength and elongation. Rev 9 iss 2 dated 16/03/2020.
Finished Goods Specification for Heat Sealeable Co-ex BOPP, width 400mm, length 1500mm, 25 micron.
Statement of Compliance issue 3 dated 09/09/2020.
Declaration of Compliance from Supplier SRF, for BOPET films rev2 iss 3 dated 16/03/2020, detailing compliance with, but not necessarily limited to; 1935/2004, 2023/2006, 10/2011, and EU 2019/37.

3.5	Internal audits

There are formal procedures in place for internal auditing of site operations against the standard, and there is a documented Internal Audit Schedule in place. The internal audit schedule covers all the activities associated with the implementation and maintenance of the BRC standard. Audits are undertaken to a schedule in relation to the risks associated with the activity.
The internal audit team comprises of the Quality co-ordinator and the external consultant, and as a result the Internal Audit Team is suitably diverse to ensure impartially.
All team members have been formally trained and training records are present on site.
N/C's when raised are recorded on the audit report and also on the summary sheet with root cause considered as part of the corrective action. There is also an audit matrix of N/C's held on the system as an overview. Corrective actions are allocated a timeframe for completion, this typically being 4 weeks. The completion of corrective action is signed off on the system by Auditor. The site has introduced a programme of hygiene and housekeeping inspections on a quarterly schedule but the frequency could be changed if the risk to the product should alter.

Audit Evidence;
Audit Schedule for 2020/2021 (the audit year runs from July to July)
Internal Auditing Procedure, Issue 3, dated 28/08/2020.
Full sytem audit conducted by external consultant July 2020 and February 2021, completed by the Quality Manager and the Consultant and highlighted 2 non-conformances both of which have been addressed using root cause analysis and closed out.
Hygiene and Housekeeping inspection dated 11/09/2020.
Training record for Keith Ogden from Effective Control, in Qaulity Assurance Auditing, May 1995, issued by Bywater plc Certificate A2161, registeed under the IQA Register of Certified Auditors.
Competency assessment record for Steven Walsh for internal auditing from Effective Control Ltd 2019.

3.6	Corrective and preventive action

The site introduced a dedicated Root Cause Analysis and Preventive Actions Procedure to ensure the completion of root cause analysis following; -

- establish a root cause team to investigate the issue
- describe the event or non-conformity (i.e. provide a summary of what went wrong)
- confirm the sequence of events and a list of dates and times
- compile a list of implicated products/raw materials or processes
- provide a summary of any incident management or immediate corrective action that has been completed to manage the issue
- summarise any other relevant data or information (e.g. records, test results, information from staff or other complaints)
- collate all the available information
- investigate possible scenarios and collate this information

The site evaluate the effectiveness of root cause analysis at least annually at the Management review meeting.

Audit Evidence;
Root Cause Analysis and Preventive Actions Procedure Issue 1, date 01/09/2020

3.7	Supplier approval and performance monitoring

The site has a documented procedure to manage purchasing. There is an Approved Supplier list in place, held on the incorporating suppliers of films and consumable materials. Approved suppliers complete a self-assessment questionnaire which focuses on the organisations QMS, environmental and which is reviewed and signed off by the Quality Manager. Suppliers of raw materials used to manufacture products must hold certification to a recognised quality management standard such as ISO 9001 or BRCGS Packaging. If not certified, then a supplier audit will take place. All new suppliers are subject to a trial period. Suppliers are monitored on a continual basis by the Quality and Purchasing Departments. Supplier non-conformance and results are captured, trended and actioned accordingly. Site that are BRCGS certificated have their BRCGS certification status validated against the BRCGS directory at least once annually. The site does not use agents or broker but purchases materials direct from the producer. The procedure defines how exceptions are to be handled, via DoC or CoC on delivery or before.

Audit Evidence;
Supplier approval information for: Alupol, Questionnaire dated 2020, BRCGS certificated Site Code 1322187 issued via TUV, expiry 09/03/2021.BRCGS validation seen.
Approved Supplier List June 2020.
Supplier Approval and Monitoring Procedure, Issue 2, dated 29/07/2020.

3.8	Product authenticity, claims and chain of custody

The site, and their consultant, use the trade press, various websites, including the BRCGS, Techni-K, FSA, customer and suppliers to help get news of any issues in the supply chain in relation to raw material fraud.
A Documented Vulnerability assessment has been completed that includes into account; -

- Historic evidence of substitution.
- Economic factors that 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 raw materials.

The site has detected no materials currently at risk of substitution.

Audit Evidence;
Raw Material Vulnerability Assessment Issue 1 dated 28/08/2020

3.9	Management of subcontracted activities and outsourced processes

Film is sent out to a Outsource Printer for printing then returned to the site for further processing such as slitting and rewinding. Clear documented specifications are sent to the subcontractor and the site takes control of final release to the customer

Audit Evidence;
Supplier Approval and Monitoring Procedure, Issue 2, dated 29/07/2020.
Approval for subcontract printer Tipografic, with accompanying BRC certificate, AA grade issued via QAI, certificate expiry 24th March 2021.
Email communication with Chris Round Business Development Manager Kite Packaging showing awareness of the use of outsourced supplier and their status within BRC certification.

3.10	Management of suppliers of services

The site uses several suppliers of services such as, but not necessarily limited to, pest control, waste, laundry, transport. The approval of these suppliers is covered in the purchasing procedure. Service specifications are in place for suppliers of services, examples being Transport, Waste Management and Pest Control and measuring and monitoring of suppliers of service is carried out in the same way as that for suppliers of raw materials.

Audit Evidence;
Service Supplier approval information for: Haulier agreement, signed by M Kennedy from M & S Transport, dated 14/12/2020.
Approved Supplier List June 2020.
Supplier Approval and Monitoring Procedure, Issue 2, dated 29/07/2020.

3.11	Traceability

The site has formal procedures in place to trace and follow raw materials through all stages of the manufacturing process and vice versa. Raw materials enter the site and contain unique coil reference numbers which are linked to the PO No. Raw materials are booked into stock and given a location in the warehouse and a reel identification number or paper batch number is allocated via the DNA system (the site's MIS system). Raw materials are then issued to

production and linked to a unique W/O No. The W/O No. follows the job through all stages of the manufacturing process and into the finished goods warehouse where they are scanned in and out.
Traceability is maintained via bespoke manufacturing works order No. that tracks products through the manufacturing and delivery process. Data is recorded on manufacturing documents. The Customer can identify finished goods via box labels and delivery notes. Box labels carry Barcode, Product Code, Quantity, Weight, W/O No. Date, Press, Time, Carton No and Description. The site conducts both forward and reverse tests annually. Completed within a reasonable timeframe. Rework is not carried out. Any retained sampes have the job number applied for trace ability.

Audit Evidence;
Site traceability exercise, conducted 17th June 2020, for both forward and reverse. This was achieved by essentially starting with a despatch note, 27556, linked to a job number 21715, and tracing that backwards to raw material supply and tracing it forwards to customer, as follows; for 1 master roll of 25 micron, Heatseal Co-ex BOPP film, measuring 520mm wide with roll number 430055211/158020/2/5, supplied by Alupol of PO 3382, delivered 08/03/2020, GIN number 39750 was assigned to this product. The MIS determiend that this was used for Goodfellows of Dundee Ltd against customer order number Roy15062020, the roll was slit by operator Ian Farrington on the Deacro machine, against works order 21715. There as an accompnaying list of batch numbers for the subsequent rolls produced. Full traceability was demonstrated. Within 2 hrs
Traceability during audit - Works order number 22938, for customer Evesham Speciality Packaging, against order number 33658, for Heat Sealable Co-ex BOPP 25 micron, 64 rolls, with accompanying sales order acknowledgement, produced on machine Eldec Punch BOPP length 1700m, width 880mm. Weight 20.05kg, material delivered by Nahar Poly Films Ltd, against site PO 3633, dated 16/05/2020, IPC chart (Internal Process Control) for job 22938, Certificate of Conformity, delivery note 29759, Full traceability was demonstrated. Duration 2 Hrs
Traceability procedure 3.9, Issue 2, dated 01/09/2020.

3.12	Complaint handling

The site has documented procedures for the handling of customer complaints. Complaints come into the business direct from Customers via email or phone. All Customer complaints, in additional to internal complaints, are logged on the Complaint Log and are investigated, and depending on the nature and severity a thorough root cause analysis investigation is carried out – this is detailed in the procedure. Action is proposed and agreed, and the Customer is informed in writing of the results of the investigation and the time scale for completion.
Complaints are trended and discussed at the Management Review meetings. The trend analysis works on the Management Review year, i.e. June to June. There have been 9 complaints June to date in 2020/21, and there was a total of 31 for 2018/19, 19 for 2019/20 thus showing a downward trend year on year.

Audit Evidence;
Complaint data:
Complaints Procedure 3.11, Issue 2, dated 29/07/2020.
Complaint spreadsheet 2020 – this non conformance data base includes external NCR's raised by customers, internal NCR's and NCR's raised on suppliers.
Complaint D157, dated 02/12/2020, for customer Prolam, due to a Short reel. Root cause determined that this was due to the operator slabbing off some damaged materials and not recording. The operator was retrained and the complaint closed out.

3.13	Management of product withdrawals, and incidents and product recalls

The site has a written procedure to manage product withdrawals and recalls. The incident management team is defined the General Manager, Quality Manager and any other relevant member of staff whose expertise may be required.
Any incident is recorded on the system and acted upon immediately. The site makes staff aware of what constitutes a recall. The procedure is capable of being put into operation at any time. The General Manager in collaboration with the Customer is ultimately responsible for withdrawal decisions. Contact lists for Customers are in place. Customer and regulatory body communications are the remit of the General Manager should the incident require it. The withdrawal procedure is tested annually and was reviewed during the assessment and found to be effective and undertaken in collaboration with the Customer who was able to successfully identify the product at their site There have been no product withdrawals and the site has not been asked to assist in any Customer product recalls during the last 12 months. The site makes staff aware of what constitutes a recall.

Audit Evidence;
Withdrawal procedure 3.12, Issue 3, 01/09/2020.
Traceability procedure 3.9, Issue 2, dated 01/09/2020.
Last withdrawal exercise was conducted conducted 17th June 2020, for 1 master roll of 25 micron, Heatseal Co-ex BOPP film, measuring 520mm wide with roll number 430055211/158020/2/5, suppplied by Alupol of PO 3382, delivered 30/05/2019, GIN number 50337was assigned to this product. The MIS determiend that this was used Goodfellows of Dundee Ltd against customer order number Roy150620209, the roll was slit by operator Ian Farrington on the Deacor machine, against works order 21715. There as an accompanying list of batch numbers for the subsequent rolls produced. Additionally, there was copies of email communication with the customer who was able to identify, locate, and quarantine the stock. The test took approximately 54 minutes.

Non-applicable clauses	3.4.4, 3.11.5

4.	Site Standards
4.1	External standards

The site comprises 2 units covering just over 2770 square metres. The site is located on an industrial estate in Haydock with other activities on the estate not affecting site operations. A full review was undertaken of all external areas. Grounds within the Site were seen to be controlled, managed and maintained to an appropriate standard at the time of assessment. The external buildings are relatively modern, dating from the 1980's, and are predominantly brick and steel cladding. The external structures are being maintained well. The site had a clean and unobstructed area along the external walls of buildings. External pipe work and other access points for product and/or raw materials were generally appropriately sealed so as to prevent pest entry, however there is a potential access point in the new warehouse and a minor NCR was issued. External traffic routes were observed to be well surfaced at the time of the assessment. Natural drainage is adequate. Drains are trapped / protected with suitable gratings in place. There are dedicated areas given over to waste streams with clearly marked containers in evidence. Raw materials are not stored externally.

Audit Evidence;
A full inspection of all external areas of the site was carried out during audit 11th February 2021.

Roller Shutter door in Keedwell Warehouse is not sealing properly and could allow pest ingress. NC 1

4.2	Building fabric and interiors: raw materials handling, preparation, processing, packing and storage areas

Floors are constructed of concrete and sealed with epoxy resin. Designated routeways are in place. Floors are maintained and in good condition. Walls are steel cladding and breezeblock and are painted in some areas. The roof is corrugated sheeting incorporating Perspex sky lights. Production and storage lighting consist of suitable, protected and/or shatterproof tubes, no evidence of breakages was evident on the site tour. There are fly screens on external windows where necessary. Ventilation cooling systems are in place. There are no Suspended ceilings, there are no internal drain opening. There are no elevated walkways.

Audit Evidence;
A full site inspection including staff facilities, storage and production areas, engineering and tooling workshop, office areas 11th February 2021.

4.3	Utilities

Water is only used for cleaning purposes. It is via mains supplies provided by the local water authority United Utilities. A report on water quality is available on the provider's website. All water supplied to site is of potable quality and is not used in the manufacturing process. Compressed air is utilised on machinery for operational control of valves and cylinders and also to blow product out of the forming machines. Compressed air is filtered, dried, and oil separated. The 2 compressors on site are maintained and serviced to a schedule by Airflow Compressors and Pneumatics Ltd.,

Audit Evidence;
Last Air Compressor service report, conducted 20/11/2020, B service with oil and oil filter change, for machine BOGE C25 5079849, by Airflow Compressors and Pneumatics Ltd.

4.4	Site security and product defence

The site has undertaken and documented a vulnerability risk assessment. The assessment focuses on site security and the potential for malicious intervention.
The site is protected with a full CCTV monitoring, part security fencing, security gates and security lighting. All entrances are number access pads. Signage is clearly displayed on reception. All visitors sign in on entry and staff are encouraged to report or challenge any unidentified or unaccompanied personnel. There are no external tanks or silos.

Audit Evidence;
Hazard and Risk Management System, issue 5, dated 12/10/2020.
Security Risk and Product Defence Risk Assessment and Procedure issue 3 dated 01/09/2020.

4.5	Layout, product flow and segregation

There is a plan of the site in place, which shows all access points for personnel, staff facilities, waste routes, storage areas, people flow and process flow. There is an appropriate laid out production flow system in operation. Segregation in the plant is via departmental layout i.e., raw material storage, work in progress and finished goods. The manufacturing area has sufficient space provided for all operations. Sorting rarely takes place but is conducted in a segregated area to the same standards, Outer packaging is removed prior to production to avoid contamination.

Audit Evidence;
Site plan dated 21/12/2020.

4.6	Equipment

The equipment is designed specifically for its intended purpose. The site has dedicated engineers with the knowledge and expertise required to ensure compliance with this clause. The machinery is being maintained to very high standard. There are 11 slitting lines, one fitted with a punching unit and two fitted with hot needle perforation units, one rewinder and one centrefold machine on site. There is no wooden equipment used in manufacturing and storage areas. Notices on equipment were observed to be cleanable and secure.

Audit Evidence;
Inspected all machinery and ancillary equipment during audit 11th February 2021.

4.7	Maintenance

There is a fully implemented PPMP in place supported by several full time Engineers operating under the stewardship of General Manager, Dave Green.
The system is a both paper-based and electronic and is maintained by the on-site team. All machinery and assets are subject to scheduled PPM on a 4 weekly, quarterly, 6 monthly and annual basis. Procedures included but were not limited to lubrication, checking of clutch and brake and mechanical and electrical checks. All maintenance including line clearance hand backs are recorded on the PPM Checklist or the Engineering Rectification Form following a breakdown or adjustment to the machine. Food grade lubricants are used when PPM is being undertaken.
Temporary modifications are undertaken on site, but instances are extremely rare. They are recorded and are always subject to a timed permanent fix.
The excellently maintained workshop opens onto the Mezzanine floor and has swarf mat provision in place.

Audit Evidence;
Excel Preventive Maintenance Planner – open tasks reviewed daily, and colour coded to completion.
Machine Eldec Punch records dated 30/10/2020, conducted by D Green (Engineer), for a service.

4.8	Housekeeping and cleaning

There are established cleaning procedures in place at the site. Production staff are responsible for cleaning their own areas and machinery as are Warehouse Personnel. Staff facilities are cleaned by a dedicated inhouse employee.
There is a clean as you go policy in place and excellent standards of hygiene were observed during the assessment in all areas.
Cleaning schedules are also in place for all areas of the site, that contain the item/area to be cleaned, frequency, materials used, verification for cleaning, the method for cleaning is nit there and a minor NCR raised.
Cleaning chemicals observed during the assessment were fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers' instructions. There is a COSHH Register in place with MSDS's available for all materials used on site. No strongly scented chemical noted on site.
Toilet cleaning equipment is colour coded red and stored separately. Other cleaning equipment is also colour coded and stored in dedicated locations around the site.
The site have carried out a risk assessment for environmental monitoring as part of the HARM Study, the result is that this is not required due to the nature the materials being processed.

Audit Evidence;
Viewed cleaners' cupboard.
Cleaning procedure 4.8, Issue 3, dated 02/09/2020.
Welfare Cleaning records for 12/02/2021, completed by Dominique Purcell, and verified by Steven Walsh.

Cleaning schedules do not contain the method of cleaning. NC 2

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

Controls to minimise foreign body contamination are in place across all areas of the site and were observed to be effective during the assessment.
The site has documented policies and procedures for the control of glass and brittle plastics. Light tubes are shatterproof and/or protected in production and storage areas. Glass and brittle plastics are monitored through monthly audits, undertaken by the Quality Manager. Registers were up to date at the time of the assessment. There is no unnecessary glass or brittle plastic in place. There is a glass breakage procedure in place and all Incidents of glass breakage are recorded on the Glass Breakage Report Form.

Audit Evidence;
Glass and Brittle Materials Procedure 4.9.1, Issue 3 dated 03/09/2020.
Last glass audit conducted 04/02/2021 by Steven Walsh, Quality Manager.
Viewed for the time of the VA Job 10/10/2020,

4.9.2	Sharps and metal control

The site has documented procedures to manage the control of sharps. No sharp objects were observed out of place during the assessment. Snap off blades are not permitted on site. Conventional Stanley knives only with retractable blades and are issued to warehouse personnel and setters only. Knives & blades are controlled via registers and validated by the Shift Supervisors. Disposal of blades is via yellow sealed sharps containers. There are no open noticeboards in production.

Audit Evidence;
Blades and Sharp Control Procedure 4.9.2.1., Issue 2, dated 02/09/2020.
Knife register spreadsheet 2020 showing all employees having received a new knife on 19th January 2021.

4.9.3	Chemical and biological control

There is a formal control system in place for chemicals. The Quality Department maintain a list of approved chemicals and MSDS's. The company have assessed chemical and microbiological risks using the hazard analysis system and controls have been designed to prevent contamination where appropriate. Cleaning chemicals were observed to be controlled, all seen to be labelled, closed/capped with manufacturers' instructions and stored away from production in secure designated locations at the time of the assessment and may only be used by authorised personnel. No strongly scented chemicals were noted during the assessment.

Audit Evidence;
MSDS for Food Safe Grease K968, supplied by Brit-lube dated 18/08/2010 edition 2.
Master list of all chemicals used on site

4.10	Waste and waste disposal

Waste is well controlled on site in accordance with legislative requirements. There are also skips in evidence in the external yard clearly marked with the designated waste streams. Waste is split into dry mixed recycling, in the form of plastic films, and general waste. Waste is removed from site via licenced contractors such as EWC (Environmental Waste Controls) – cardboard and PP and Freshco Environmental Ltd – General Waste. Trademarked (printed) waste is disposed of with the relevant waste stream.

Audit Evidence;
Freshco Environmental Ltd. Waste Carrier registration CBDU44197 Expires 21/10/2021
Environmental Waste Controls Ltd, CBDU158060 Expires 17/03/202

4.11	Pest management

Site pest control is managed by an approved contractor NWPC who provide 8 routine, 4 EFK and 2 field biologist visits per annum. The file was up to date and well maintained.

Audit Evidence;
NPTA certificate membership no. 0852 exp 15.04.2021.
Last technician routine visit report – 05-01-2021 with no evidence of rodent activity. Sticky pads were replaced.
Last biologist technical visit report 25/01/2021 with a number of recommendations relating to potential for pest ingress or potential for pest harbourage, all of which have been closed out.
Last EFK visit 09/06/2020 plus catch tray analysis trending and last bulb change also 09/06/2020.
Any evidence of Long-Term Infestation: - None observed during audit or from technician's or biologists reports.
Site bait plan dated 04/01/2021.
Training records for S Dunlop – Field Biologists, and Jon Thompson, Technician.

Non-applicable clauses	4.1.5, 4.2.2, 4.2.3, 4.2.6, 4.4.3, 4.11.3

5. Product and process control

5.1	Product development

As the site simply handles product and slits and rewinds film predominantly, there is no product development as such. Trials are undertaken but this is more about the customer ensuring runnability on the customer's machine. The site has procedure for the transfer of data from customer enquiries to the operating in the specification and contract review procedure with an order acknowledgement sent to the customer to validate the details are correct.

Audit Evidence;
Specifications and Contract Review Issue 2 14/07/2020

5.2	Graphic design and artwork control

The site subcontracts print on the few occasions that it is required. Artwork is received as approved, electronically, from customers and passed to the General Manager for technical assessment and suitability to print. The artwork is then sent to the print supplier to print the film. The General Manager is responsible for checking printed film received from the supplier.

Audit Evidence;
Viewed artwork approval for Enquiry EFFQ000158/2 for Kite packaging by Chris Round via e-mail.

5.3	Packaging print control

No Printing undertaken on site.

5.4	Process control

The site has procedures in place to ensure effective control of all operations relating to critical product defects. It was observed that the operations on site were controlled through effective Process procedures, Quality Assurance procedures and Works Instructions to continually achieve correct manufacture of safe and legal products.
Senior members of the Technical Production and Quality Departments continually review on site processes to ensure consistency of product is maintained. Established controls are in place to ensure product integrity with corresponding manufacturing Works Instruction's and a "Control of Non-Conforming Product Procedure". PRP's maintain standards of hygiene. Production specifications and machine settings, inclusive of tolerances are available for all products.
Specifications are approved internally by Technical, Production, Sales & Quality personnel, before a quotation is raised to the customer. There are 2 manufacturing processes in operation on site and examples of typical machine settings would include speeds, tensions and pressures.
The Works Order defines the specification and process set up of the production machinery and also includes the Bill of Materials. There are first off sampling and inspection regimes in place. Following first off sample sign off, there are in-process inspections by operatives, defined through Works Instruction's and recorded every hour on the production paperwork. Lines clearance procedures are in place. Line clearance is recorded on the "Internal Process Control Chart", with the process defined in the process control procedure – Slitting, Perforation and Punch Processes, and defines the requirements of the standard, Roles of the person involved, area where to check, validation of the line clearance and approval to carry on production.
New specifications are raised after an approval process with the customer. The quality procedures are then re-validated to ensure conformity to specification and are verified via in-process inspection regimes.

Audit Evidence;
Process Control procedure - Slitting, Perforation and Punch Processes, 5.4.1 Issue 3 dated 08/09/2020.
Checks carried out during tour on Eldec Punch for a job for customer Evesham Speciality Packaging job number 230

5.5	Calibration and control of measuring and monitoring devices

There are several items of calibrated equipment on site. Calibration is performed either internally or by recognised Calibration houses that use equipment traceable to National Standards.
Equipment is subject to scheduled calibration and both hard copy and electronic records maintained by the Quality Department.

Audit Evidence;
Register of calibrated equipment, dated 18/12/2020.
Calibration Procedure Issue 3, 07/09/2020
Marsden Scales, location production room at Eldec machine certificate number AW/68/66/20, serial number 28773.

5.6	Product inspection, testing and measuring

Process control procedures and Works Instructions define checks on each product. Quality in process inspections are carried out at all stages of manufacturing by line operatives. Checks are recorded every set by operators on the production paperwork and include but are not limited to Width, tension, record edge and core profile. Checks were in evidence at the time of the assessment.
The site has used hazard and risk principles to assess the need for in-line testing and has deemed offline quality checks sufficient to ensure the safety and legality of all manufactured products.
Migration testing is not undertaken by the site.

Audit Evidence;
Quality Checks recorded for order no. 22938 as part of Traceability test referenced in Section 3.11 of this report.
Quality checks observed on Eldec Punch for Job number 230.

5.7	Control of non-conforming product

The site has a documented procedure to manage the Control of non-conforming product. The procedure details controls required for any out of specification material including labelling and quarantining. All non-conforming products are subject to "Quarantine" status and are then subject to investigation by the Quality Department. All instances of non-conforming material are recorded.

Audit Evidence;
Non-Conforming Product Procedure 5.7, Issue 3, 08/09/2020.
Root Cause Analysis and Preventive Actions Procedure Issue 1, date 01/09/2020

5.8	Incoming goods

All incoming goods are visually checked for taint, odour, contamination and damage. The vehicle is also checked for overall hygiene and if acceptable the delivery note is signed, and the material is unloaded and put to stock and used in conjunction with FIFO principles.

Audit Evidence;
Discussed Goods In procedure with Warehouse Supervisor.
Incoming Goods, Storage and Dispatch Procedure 5.8, Issue 3, dated 08/09/2020.

5.9	Storage of all materials and intermediate and finished products

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

Audit Evidence;
Incoming Goods, Storage and Dispatch Procedure 5.8, Issue 3, dated 08/09/2020.
Raw Material Storage
Finished Goods Storage

5.10	Dispatch and transport

All finished goods are checked along with the vehicle and must be signed off, by stamping the delivery note, before the vehicle leaves the site. Any damaged pallets that arrive from suppliers are brought to the attention of the Shift Managers and appropriate actions taken. Transport agreements are in place with all transport companies. The site does not own any transport vehicles.

Audit Evidence;
Incoming Goods, Storage and Dispatch Procedure 5.8, Issue 3, dated 08/09/2020.
Despatch notes for customer Marshall Wilson, via The Pallet Network, dated 04/01/2020, with stamp showing vehicle had been inspected for cleanliness.
Haulier agreement, signed by M Kennedy from M & S Transport, dated 14/12/2020.
Incoming Goods, Storage and Dispatch Procedure 5.8, Issue 3, dated 08/09/2020.

Non-applicable clauses	5.1, 5.3, 5.6.3, 5.6.10

6. Personnel

6.1 Training and competence: raw materials handling, preparation, processing, packing and storage areas

All new employees are subject to an induction program comprising of health and safety procedures, quality procedures, site tour, welfare areas, first aid, smoking policy and hygiene procedures. Changes to procedures, documents or work instructions can be via toolbox briefs or full retraining on the amended document for the relevant staff.
All training undertaken by employees is recorded and signed off on an individual Training Record.
A training matrix is maintained detailing competency in key processes and roles. A training appraisal of all staff is carried out every year and any identified needs recorded. Further training is identified and implemented as necessary.
Training records for all personnel are kept for the life of the employee and also indefinitely if the employee leaves the company. Training records are managed by the Quality Assistant and were comprehensive and well kept. Training is directly linked to standard operating conditions. The process involves individuals conducting specific tasks as confirmation of competency for that operation.
Training records were readily available for sampled staff members during the assessment. There are multiple refresher training programs in place at the site, example being Food Hygiene Refresher Training. Employees are tested as the end of the training.

Audit Evidence;
Training Matrix 2020 for all employees
Training records for persons involved in the VA Job 22938:
Mark Helsby - Machine Operator, hygiene and product induction training sheets 14/12/2020 (15 minutes), glass and brittle plastics 09/09/2020 (15 minutes)
Frank Strange – Machine Operator – hygiene and product induction training sheets 184/12/2020, Process control procedure – slitting, 09/09/2020 (30mins), glass and brittle plastics 09/09/2020 (15 minutes)

6.2 Personal hygiene: raw materials handling, preparation, processing, packing and storage areas

Personal Hygiene rules are documented in the site Hygiene Instructions. Personal hygiene practices were observed to be in evidence and effective during the assessment. There is no jewellery (with the exception of one plain wedding band), mobile phones or personal medicines allowed in production or storage areas. Hand washing must take place after any visit to any area outside production or storage. Fingernails must be kept short and clean. Gloves are issued to personnel where applicable and controlled. Blue plasters are available for minor cuts and grazes issued by designated First Aiders.

Audit Evidence;
Hygiene rules were being followed at the time of the audit 11th February 2021.
Personal Hygiene Procedure, Issue 3, 08/09/2020

6.3 Staff facilities

Access to locker rooms is situated prior to entry into production. Visitors and contractor facilities are available at various locations around the site. Lockers are provided for each employee for segregation of workwear and personal items. No evidence was found during the assessment of drinking in locker rooms. Suitably maintained and controlled

hand washing facilities were seen to be in place at the site and includes the provision of warm water, unscented soap and suitable hand dryers. Hand-washing advisory signs are displayed at point of use. Hand wash stations are located at the entrance into the production areas. Toilet facilities at the site were found to be in a clean and hygienic condition at the time of the assessment and do not open directly onto production or production areas. There is a canteen provided at the site which was observed to be kept to a high standard with the provision of food storage facilities. Drinking water is allowed in one designated area from a non-contact water fountain in production. There is no eating allowed in production or storage areas. There is 1 external smoking area available along with refuse containers for smoker's waste. Electronic cigarettes are also only allowed to be used in designated smoking areas.

Audit Evidence;
Personal Hygiene Procedure, Issue 3, 08/09/2020.
All staff facilities were inspected as part of the site tour 11th February 2021.

6.4	Medical screening

All employees complete a health questionnaire during the induction process. Employees must report to their line manager if feeling unwell and are then sent home. Employees are aware of the trained in recognising the symptoms that would exclude them from working. Return-to-work protocols are in place at the site. Visitors are required to sign in and out of the site, read company rules and complete a health questionnaire, which is then counter-signed by the host. Personal medicines are not permitted in production or storage areas and must be kept in staff lockers.

Audit Evidence;
Personal Hygiene Procedure, Issue 3, 08/09/2020
Visitor sign in process viewed during audit.
All staff were seen to be adhering to the site dress code at the time of the audit 11th February 2021

6.5	Protective clothing

The site has used hazard and risk principles to determine the need for protective workwear and where it is permitted to be worn, company work wear is not permitted to be worn on the journey to and from the workplace, a white carrier type is issued for the transport of clean clothing to the workplace. Company issued protective garments that are suitable and sufficient are provided to employees and maintained via self-care. The issue comprise T-shirts, trousers, warehouse coats, sweatshirts, hairnets, and an allowance is paid for safety shoes. Beards and moustache snoods are required for covering of facial hair. Clothing is permitted to be worn between all departments. The process is monitored for compliance by Shift Supervisors. There is no disposable clothing other than hairnets and beard snoods.

Audit Evidence;
Site Hygiene Instructions Issue 2, 11/04/2018.
All staff were seen to be adhering to the site dress code at the time of the audit 11th February 2021.

Non-applicable clauses	None

Requirements for traded products

7.1	Approval and performance monitoring of manufacturers/packers of traded packaging products

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7.2	Specifications
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7.3	Product inspection and laboratory testing
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7.4	Product legality
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7.5	Traceability
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Non-applicable clauses	Click or tap here to enter text.

Additional Module: Plastic Pellet Loss Prevention	
10.1.1	Senior management commitment and control improvement
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10.2.2	Hazard analysis and risk assessment
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10.3.5	Internal audits
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10.3.6	Corrective and preventive action
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10.3.13	Management of incidents
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10.4.2	Building fabric and interiors: raw materials handling, preparation, processing, packing and storage areas
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10.4.4	Site security
Click or tap here to enter text.	
10.4.5	Layout
Click or tap here to enter text.	
10.4.8	Housekeeping and cleaning
Click or tap here to enter text.	
10.4.10	Waste and waste disposal
Click or tap here to enter text.	
10.5.8	Incoming goods
Click or tap here to enter text.	
10.6.1	Personnel: training and competence
Click or tap here to enter text.	

Non-applicable clauses	Click or tap here to enter text.