

BRCGS Packaging Materials

P604a: Issue 6 Auditor Checklist and Site Self-Assessment Tool

1 Senior management commitment

1.1 Senior management commitment and continual improvement			
Fundamental	The site's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging Materials.		
Clause	Requirements	Conforms	Comments
1.1.1	<p>The site shall have a documented policy which states the site's intention to meet its obligation to produce safe and legally compliant products to the specified quality and confirms its responsibility to its customers. This shall be:</p> <ul style="list-style-type: none"> signed by the person with overall responsibility for the site communicated to all staff. 		
1.1.2	<p>The site's senior management shall define and maintain a clear and effective plan for the development and continual improvement of a product safety and quality culture. This shall include:</p> <ul style="list-style-type: none"> defined activities involving all sections of the site that have an impact on product safety and quality a description of how the activities will be undertaken and measured, and the intended timescales a review of the effectiveness of completed and ongoing activities. Clause effective from 1 February 2021. 		
1.1.3	<p>The site's senior management shall establish clear objectives to maintain and improve the quality, safety and legality of products manufactured, in accordance with the site's product safety and quality policy and this Standard. These objectives shall be:</p> <ul style="list-style-type: none"> documented and include targets or clear measures of success clearly communicated to relevant staff monitored, and the results reported at a suitable predetermined frequency to the site's senior management. 		
1.1.4	The company's senior management shall		

		provide the human and financial resources required for the production of safe packaging material, to the required quality, and in compliance with the requirements of this Standard.		
1.1.5		<p>The company's senior management shall have a system in place to ensure that the site is kept informed of and reviews:</p> <ul style="list-style-type: none"> • scientific and technical developments • industry codes of practice • all relevant legislation applicable in the country of manufacture and, where known, the country where the product will be used. <p>Products shall meet the minimum legal requirements in the country of manufacture and of use where known.</p>		
1.1.6		The site shall have a genuine, original hard copy or electronic version of the current Standard and be aware of any changes to the Standard or protocol that are published on the BRCGS website.		
1.1.7		Where the site is certificated to the Standard, it shall ensure that recertification audits occur on or before the audit due date indicated on the certificate.		
1.1.8		<p>The most senior production or operations manager on site shall participate in the opening and closing meetings of the audit for certification to the Standard.</p> <p>Relevant departmental managers or their deputies shall be available as required during the audit.</p>		
1.1.9		The site's senior management shall ensure that the root causes of any non-conformities identified at the previous audit against the Standard have been effectively addressed to prevent recurrence.		
1.1.10		The BRCGS logo and references to certification status shall be used only in accordance with the conditions of use detailed in the audit protocol section (Part III, section 5.6).		

1.2 Management review			
	The site's senior management shall ensure that a management review is undertaken to ensure that the product safety and quality management system is both fully implemented and effective, and that opportunities for improvement are identified.		
Clause	Requirements	Conforms	Comments
1.2.1	Management review meetings attended by the site's senior management shall be undertaken at appropriate scheduled intervals (at a minimum annually) to review the site's performance against the Standard and the objectives set out in clause 1.1.3.		
1.2.2	<p>The review process shall include the evaluation of:</p> <ul style="list-style-type: none"> • previous management review documents, action plans and timeframes • the results of internal, second-party and third-party audits • any customer performance indicators, complaints and feedback • the effectiveness of the hazard and risk management (HARM) system • the impact of any applicable legislative and certification scheme changes • any incidents, corrective actions, out-of-specification results and non-conforming materials • resource requirements • any objectives that have not been met, to understand the underlying reasons. This information shall be used when setting future objectives and to facilitate continual improvement • the effectiveness of the product defence and product fraud prevention plans. 		
1.2.3	The meeting shall be documented and used to revise the objectives. The decisions and actions agreed within the review process shall be effectively communicated to appropriate staff, and actions implemented within agreed timescales.		
1.2.4	The site shall have a demonstrable system in place which enables product safety, legality, integrity and quality issues to be brought to the attention of a designated manager. The		

	system shall allow for the resolution of issues requiring immediate action.		
1.3 Organisational structure, responsibilities and management authority			
	The company shall have a clear organisational structure and lines of communication to enable effective management of product safety, legality, regulatory compliance and quality.		
Clause	Requirements	Conforms	Comments
1.3.1	<p>The site shall have a current organisation chart demonstrating the management structure and reporting channels of the company.</p> <p>The responsibilities for the management of activities which ensure product safety, quality and legality shall be clearly allocated and understood by the managers responsible. It shall be clearly documented who deputises in the absence of the responsible person.</p>		
1.3.2	<p>The site's senior management shall ensure that all employees are aware of their responsibilities. Where documented work instructions exist for activities undertaken, the relevant employees shall have access to these and be able to demonstrate that work is carried out in accordance with the instructions.</p>		

2 Hazard and risk management

2.1 Hazard and risk management team			
		A multidisciplinary hazard and risk management team shall be in place to develop and manage the hazard and risk management system and to ensure that the system is fully implemented and evaluated for its effectiveness.	
Clause	Requirements	Conforms	Comments
2.1.1	The hazard analysis and risk assessment shall be developed, reviewed and managed by a multidisciplinary team that includes those responsible for quality, technical, engineering/ maintenance, production operations and other relevant functions. In the event that the site does not have the appropriate expertise in-house, external expertise may be used to analyse any hazards and the risk of them occurring, and/or develop and review the hazard and risk management system. However, the day-to-day management of the system shall remain the responsibility of the site.		
2.1.2	The multidisciplinary team shall have a designated team leader who shall be suitably trained and able to demonstrate competence and experience of hazard and risk analysis.		
2.1.3	The team shall be able to demonstrate competence in hazard and risk analysis principles and be kept up to date with factory changes and customer requirements as they occur.		
2.2 Hazard analysis and risk assessment			
Fundamental		A documented hazard analysis and risk assessment (HARA) shall be in place to ensure that all hazards to product safety and legality are identified and appropriate controls established.	
Clause	Requirements	Conforms	Comments
2.2.1	The scope of the hazard analysis and risk assessment shall be clearly defined and documented and shall cover all products and processes included within the intended		

		scope of certification.		
2.2.2		<p>The HARA team shall maintain awareness of and take into account:</p> <ul style="list-style-type: none"> • historical, known and foreseeable product safety hazards associated with specific processes and raw materials • intended use of the product (where known) • known likely product defects that affect safety • relevant codes of practice or recognised guidelines • legislative requirements. 		
2.2.3		<p>A full description of the product, product group and process shall be developed, which includes all relevant information on product safety and integrity. As a guide this shall 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 example, direct contact with food or other hygiene-sensitive products, or the physical or chemical conditions. 		
2.2.4		<p>The process flow diagram prepared for each product, product group and process shall set out each process step from the receipt of raw materials, through manufacture and storage, to dispatch to the customer. As a guide this shall include, where applicable:</p> <ul style="list-style-type: none"> • receipt and approval of artwork and specification • receipt and preparation of raw materials such as additives, inks and adhesives • each manufacturing process step • in-line testing or measuring equipment • the use of rework and post-consumer recycled materials • any subcontracted processes • customer returns. 		
2.2.5		The accuracy of the process flow diagram		

		shall be verified by the HARA team at least once per year and following any significant incidents or process changes.		
2.2.6		<p>The HARA team shall identify and record all potential product safety 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 hazards • chemical contamination (e.g. taint, odour, allergen, component transfer from inks, varnishes and glues) • potential for unintended migration of substances from the packaging material into food or other hygiene-sensitive products • foreign objects • potential problems arising from the use of recycled materials • foreseeable misuse by the consumer • defects critical to consumer safety • hazards that may have an impact on the functional integrity and performance of the final product in use • potential for malicious intervention • potential for raw material fraud. 		
2.2.7		<p>The HARA team shall identify control measures necessary to prevent, eliminate or reduce each product safety hazard to acceptable levels.</p> <p>Where control is through prerequisite programmes as set out in sections 3, 4 and 6, these shall be reviewed to ensure they adequately control the risk identified and, where necessary, improvements implemented.</p>		
2.2.8		<p>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.</p> <p>Critical control points (CCPs) shall be those</p>		

	control points that are required to prevent, eliminate or reduce a product safety hazard to acceptable levels. Where a control point is not classified as critical and control may be achieved through a prerequisite programme, a programme shall be developed that is sufficiently specified to effectively control the identified hazard(s).		
2.2.9	For each CCP, the appropriate critical limits shall be defined in order to identify clearly whether 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.		
2.2.10	For each CCP, a monitoring system shall be defined in order to ensure compliance with critical limits. Records of the monitoring shall be maintained. Documented procedures relating to the monitoring of critical controls shall be included in internal audits against the Standard (see clause 3.5).		
2.2.11	The corrective action that shall be taken when monitored results indicate a failure to meet the control limit for CCPs 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, quality and legality can be established.		
2.2.12	<p>A review of the hazard and risk management system and prerequisite programmes shall be carried out at least once per year and following any significant incidents or when any process changes.</p> <p>The review shall include a verification that the hazard analysis and risk assessment plan is effective. It shall also include any:</p> <ul style="list-style-type: none"> • process changes • product composition changes • complaints • product failures and finished product recalls from consumers (including 		

	<p>system tests)</p> <ul style="list-style-type: none">• product withdrawals• results of internal audits of prerequisite programmes• results from external and third-party audits• new developments in the industry associated with materials, process or product.		
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3 Product safety and quality management

3.1 Product safety and quality management system			
	The site's processes and procedures to meet the requirements of this Standard shall be documented to allow consistent application, facilitate training, and support due diligence in the production of a safe and legal product.		
Clause	Requirements	Conforms	Comments
3.1.1	<p>The site's documented policies, procedures, working methods and practices shall be collated in a navigable and readily accessible system, with consideration being given to translation into appropriate languages.</p> <p>Where the site is part of a company governed by a head office, the interaction between the site's system and that of other sites and the head office should be documented.</p> <p>All policies and procedures necessary for the operation of the site being assessed must be available at the site.</p>		
3.1.2	The system shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary.		
3.2 Document control			
	An effective document control system shall ensure that only the correct versions of documents, including recording forms, are available and in use.		
Clause	Requirements	Conforms	Comments
3.2.1	<p>The company shall have a documented procedure to manage documents which form part of the product safety and quality management system. This shall include:</p> <ul style="list-style-type: none"> • a list of all controlled documents indicating the latest version number • the method for the identification and authorisation of controlled documents • a record of the reason for any changes or amendments to the documents • the system for the replacement of existing documents when these are updated. 		
3.2.2	Where documents and records are in		

	<p>electronic form these shall be:</p> <ul style="list-style-type: none"> • stored securely (e.g. with authorised access, control of amendments, or password- protected) • backed up to prevent loss or malicious intervention. 		
3.3 Record-keeping			
	The site shall maintain genuine records to demonstrate the effective control of product safety, legality and quality.		
Clause	Requirements	Conforms	Comments
3.3.1	Records shall be legible, appropriately authorised, retained in good condition, and retrievable.		
3.3.2	Any alterations to records shall be authorised and justification for the alteration shall be recorded.		
3.3.3	The company's senior management shall ensure that documented procedures are established and implemented for the organisation, review, maintenance, storage and retrieval of all records relating to product safety, legality, regulatory compliance and quality.		
3.3.4	The site shall document its period of retention for records which relate to the usable life of the packaging and the products it is designed to contain, and shall respect any customer requirements.		
3.4 Specifications			
Fundamental	Appropriate specifications shall exist for raw materials, intermediate and finished products, and for any product or service which could affect the safety, quality or legality of the finished product and customer requirements.		
Clause	Requirements	Conforms	Comments
3.4.1	Specifications shall be suitably detailed, accurate and compliant with relevant product safety and legislative requirements. They may be in the form of a printed or electronic document, or part of an online specification system.		
3.4.2	The company shall seek formal agreement of		

	<p>specifications with relevant parties where required by the customer. Where specifications are not formally agreed, then the company shall be able to demonstrate that it has taken steps to put an agreement in place.</p>		
3.4.3	<p>Where packaging for food or other hygiene-sensitive products is produced, a statement of compliance shall be maintained which enables users of the packaging to ensure compatibility between the packaging and the product with which it may be in contact.</p> <p>The statement of compliance shall be compiled and authorised by a suitably competent person. It shall contain as a minimum:</p> <ul style="list-style-type: none"> • the nature of the materials used in the manufacture of the packaging • confirmation that the packaging meets relevant legal requirements • the inclusion of any post-consumer recycled materials. The statement shall identify: • its date of issue and, where appropriate, its expiry date • any limitations of use of the product, and • the usable life of the packaging (where relevant). <p>The site shall review the statement of compliance at a risk-based frequency.</p>		
3.4.4	<p>The presence of a manufacturer's trademarks or logo on packaging materials shall, where appropriate, be formally agreed between the relevant parties.</p>		
3.4.5	<p>A specification review process shall be operated where the product composition or characteristics change or at an appropriate predetermined interval. Reviews and changes shall be documented and communicated to the customer, where required.</p> <p>Any changes to existing agreements or contracts shall be agreed, documented and communicated to appropriate departments.</p>		

3.5 Internal audits			
Fundamental	The company shall be able to demonstrate that it verifies the effective application of the requirements of the Standard and any applicable module through internal audits.		
Clause	Requirements	Conforms	Comments
3.5.1	<p>There shall be a scheduled programme of internal audits.</p> <p>The frequency at which each activity is audited shall be established in relation to the risks associated with the activity and previous audit performance. All processes shall be audited at least annually.</p> <p>The internal audit programme shall be fully implemented and effective.</p>		
3.5.2	<p>As a minimum, the scope of the internal audit programme shall include the:</p> <ul style="list-style-type: none"> • HARA or product safety and quality plan, including the activities to implement it (e.g. supplier approval, corrective actions and verification) • prerequisite programmes (e.g. hygiene, pest control) • product defence and product fraud prevention plans • procedures implemented to achieve the Standard and modules. <p>Each internal audit within the programme shall have a defined scope and consider a specific activity or section of the HARA or product safety plan.</p>		
3.5.3	Internal audits shall be carried out by appropriately trained and competent auditors. Auditors shall be independent from the process or activity being audited to ensure impartiality (i.e. they must not audit their own work).		
3.5.4	<p>Internal audit reports shall identify conformity as well as non-conformity.</p> <p>Results shall be notified to the personnel responsible for the process/activity audited.</p> <p>Root cause analysis shall be used to determine appropriate corrective actions and a designated manager shall be responsible for the implementation.</p>		

3.5.5	<p>For sites manufacturing materials intended to be in contact with food or other hygiene-sensitive products, in addition to the internal audit programme, there shall be a separate programme of documented inspections to ensure that the factory environment and processing equipment are maintained in a suitable condition. At a minimum, these inspections shall include:</p> <ul style="list-style-type: none"> • hygiene inspections to assess cleaning and housekeeping performance • inspections to identify risks to the product from the building or equipment. <p>The frequency of these inspections shall be based on risk.</p>		
3.6 Corrective and preventive action			
Fundamental	The site shall be able to demonstrate that it uses the information from failures in its systems and processes to take any necessary corrective and preventive actions.		
Clause	Requirements	Conforms	Comments
3.6.1	<p>The site shall have a procedure for the completion of root cause analysis and corrective actions and to determine preventive actions. As a minimum, root cause analysis shall be used to implement ongoing improvements and to prevent recurrence of non-conformities in the event of:</p> <ul style="list-style-type: none"> • an analysis of non-conformities for trends which shows that there has been a significant increase in a type of non-conformity • a non-conformity which places the safety, legality, integrity or quality of a product at risk (including withdrawals) • the results of internal, second- or third-party audits • customer complaints • failure of in-line testing equipment • any incidents. 		
3.6.2	The site shall evaluate the effectiveness of root cause analyses, and of any corrective and preventive actions.		

3.7 Supplier approval and performance monitoring			
	The company shall operate effective procedures for the approval and monitoring of its suppliers.		
Clause	Requirements	Conforms	Comments
3.7.1	<p>The site shall have a documented supplier approval procedure and continual assessment programme in place, based upon risk analysis and defined performance criteria. These shall apply to the suppliers of:</p> <ul style="list-style-type: none"> materials outsourced (subcontracted) production. <p>The procedure shall ensure that the materials and services procured conform to defined requirements where there is a potential impact to product safety, quality or legality.</p>		
3.7.2	<p>The approval procedure shall be based on risk and include either one or a combination of:</p> <ul style="list-style-type: none"> a valid certification to the applicable Global Standard or GFSI-benchmarked standard. <p>The scope of the certification shall include the raw materials purchased, and the site shall validate any BRCGS certificates using the BRCGS Directory.</p> <ul style="list-style-type: none"> supplier audits, with a scope to include product safety, traceability, HARA review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety auditor. Where the supplier audit is completed by a second or third party, the company shall be able to: demonstrate the competency of the auditor confirm that the scope of the audit includes product safety, traceability, HARA review and good manufacturing practices obtain and review a copy of the full audit report <p>or</p> <ul style="list-style-type: none"> where a valid risk-based justification is provided, a satisfactorily completed 		

	supplier questionnaire may be used for initial approval. The questionnaire shall have a scope that includes product safety, traceability, HARA review and good manufacturing practices, and it shall have been reviewed and verified by a demonstrably competent person.		
3.7.3	<p>There shall be a documented process for ongoing supplier performance review, based on risk and defined performance criteria. The process shall be fully implemented.</p> <p>Where approval is based on questionnaires, these shall be reissued at agreed intervals based on risk, and suppliers shall be required to notify the site of any significant changes in the interim, including any change in certification status.</p> <p>Records of ongoing supplier assessment and any necessary actions shall be maintained and reviewed.</p>		
3.7.4	<p>The site shall have an up-to-date list or database of approved suppliers. This may be on paper (hard copy) or it may be controlled on an electronic system.</p> <p>The list or relevant components of the database shall be readily available to the relevant staff.</p>		
3.7.5	The company shall ensure that its suppliers of raw materials have an effective traceability system. Where a supplier has been approved based on a questionnaire instead of certification or audit, verification of the supplier's traceability system shall be carried out on first approval and then at least every 3 years. This may be achieved by a traceability test.		
3.7.6	<p>Where raw materials are purchased from companies that are not the manufacturer or packer (e.g. purchased from an agent, broker or wholesaler), the site shall know the identity of the last manufacturer or packer.</p> <p>Information to enable the approval of the manufacturer or packer shall be obtained from the agent/broker or directly from the supplier, unless the agent/broker is certificated to the relevant Global Standard</p>		

	(e.g. Global Standard for Agents and Brokers) or a relevant standard benchmarked by GFSI.		
3.7.7	<p>The procedures shall define how exceptions are handled; for example, the use of products or services where an audit or monitoring has not been undertaken. Assessment (on a batch or delivery basis) may take the form of:</p> <ul style="list-style-type: none"> • certificate of analysis • statement of compliance. 		
3.8 Product authenticity, claims and chain of custody			
	Systems shall be in place to minimise the risk of purchasing fraudulent raw materials for packaging and to ensure that all product descriptions and claims are legal, accurate and verified.		
Clause	Requirements	Conforms	Comments
3.8.1	<p>The company shall have processes in place to access information on historical and developing threats to the supply chain which may present a risk of substitution of raw materials (i.e. fraudulent raw materials). Such information may, for example, come from:</p> <ul style="list-style-type: none"> • trade associations • government sources • private resource centres. 		
3.8.2	<p>A documented vulnerability assessment shall be carried out on all raw materials or groups of raw materials to assess the potential risk of substitution. This shall take into account:</p> <ul style="list-style-type: none"> • historical evidence of substitution • economic factors which may make substitution more attractive • ease of access to raw materials through the supply chain • sophistication of routine and upstream testing to identify substitution • nature of the raw material. <p>The output from this assessment shall be a documented vulnerability assessment plan. This plan shall be kept under review to reflect changing economic circumstances and market intelligence which may alter the potential risks. It shall be formally reviewed annually.</p>		

3.8.3	Where raw materials are identified as being at particular risk of substitution, the vulnerability assessment plan shall include appropriate assurance and/or testing processes to mitigate the identified risk(s).		
3.9 Management of subcontracted activities and outsourced processes			
	Where any process steps in the manufacture of the packaging material are outsourced to a third party, or the process is wholly subcontracted to another site, this shall be managed to ensure it does not compromise the quality, safety or legality of the product.		
Clause	Requirements	Conforms	Comments
3.9.1	The company shall be able to demonstrate that, where any part of the production is outsourced and undertaken off-site, this has been declared to the customer or brand owner and, where required, approval has been granted.		
3.9.2	Where any processes are subcontracted or outsourced, including artwork or pre-press activity, the risks to the quality and safety of the product shall form part of the hazard and risk analysis and the company's evaluation of the system shall be held on record.		
3.9.3	Clear specifications shall be agreed for all work outsourced or subcontracted.		
3.9.4	Where any process steps in the manufacture of the packaging materials are subcontracted or outsourced, final release of the product shall remain the responsibility of the site. Controls shall be in place for checks on finished work to ensure product safety and quality meets specification prior to dispatch to the final customer.		
3.9.5	The company shall ensure that any subcontracted or outsourced processors have an effective traceability system. Where a supplier has been approved based on a questionnaire instead of certification or audit, verification of the supplier's traceability system shall be carried out on first approval and then at least once every 3 years. This may be achieved by a traceability test.		

3.10 Management of suppliers of services			
	The company shall be able to demonstrate that, where services are outsourced, any risks presented to product safety, quality or legality have been evaluated to ensure effective controls are in place.		
Clause	Requirements	Conforms	Comments
3.10.1	<p>There shall be a documented procedure for the approval and monitoring of suppliers of services. Such services shall include, but are not limited to:</p> <ul style="list-style-type: none"> • pest control • laundry services • transport and distribution • storage and dispatch • sorting or rework • laboratory services • calibration services • waste management • product safety and quality consultants to the site. <p>Providers of utilities such as water, electricity or gas may be excluded on the basis of risk. This approval and monitoring process shall be risk-based and take into consideration:</p> <ul style="list-style-type: none"> • risk to the safety and quality of products • compliance with any specific legal requirements • potential risks to the security of the product (i.e. risks identified in the vulnerability and product defence assessments). 		
3.10.2	Contracts or formal agreements shall exist with the suppliers of services which clearly define service expectations and ensure potential risks associated with the service have been addressed.		
3.11 Traceability			
Fundamental	The site shall be able to trace and follow all raw materials through processing (including subcontracted processes) to the distribution of the finished product (packaging material) to the customer and vice versa.		
Clause	Requirements	Conforms	Comments
3.11.1	The site shall have a documented traceability		

	procedure and system that can trace and follow all raw materials from the supplier through all stages of processing (including subcontracted processes) and distribution of the finished product, and vice versa. Where continuous processes are used, or raw materials are in bulk silos, traceability shall be achieved to the best practical level of accuracy.		
3.11.2	Identification of raw materials, intermediate products, finished products, non-conforming products and quarantined goods shall be adequate to ensure traceability.		
3.11.3	For traceability, an appropriate system shall be in place to ensure that the customer can identify a product or production lot number for the product. Where coding is applied, this shall be checked for legibility and accuracy against production records.		
3.11.4	The traceability procedure and system shall be tested at a predetermined frequency, at least annually, and the results shall be retained and easily retrieved for inspection. Traceability of all materials shall be achievable in a timely manner.		
3.11.5	Where rework or any reworking operation is performed or outsourced or subcontracted activities are carried out, traceability shall be maintained.		
3.11.6	Traceability of test data and samples to production lots shall be maintained.		
3.12 Complaint-handling			
	Customer complaints relating to product hygiene, safety or quality shall be handled effectively and the information used to reduce complaint levels.		
Clause	Requirements	Conforms	Comments
3.12.1	All complaints shall be recorded and investigated (including root cause analysis) and the results of the investigation documented. Actions appropriate to the seriousness and frequency of the problems identified shall be		

	carried out promptly and effectively by appropriately trained staff.		
3.12.2	Complaint data shall be analysed to identify significant trends. Where there has been an increase or repetition of a complaint type, root cause analysis shall be used to implement ongoing improvements to product safety, legality and quality, and to avoid recurrence. This analysis shall be made available to relevant staff.		
3.13 Management of product withdrawals, incidents and product recalls			
	The site shall have a documented procedure and systems in place to effectively manage any product withdrawals, returns from customers, incidents or product recalls in order to ensure that all potential risks to the hygiene, quality, safety or legality of products and the final consumer are controlled.		
Clause	Requirements	Conforms	Comments
3.13.1	A product withdrawal procedure shall be documented and include as a minimum: <ul style="list-style-type: none"> • identification of the key personnel involved in assessing potential product withdrawals or returns, with their responsibilities clearly defined • a communications plan including methods of informing customers • root cause analysis and corrective action to implement appropriate improvements as required. 		
3.13.2	The withdrawal procedure shall be capable of being operated at any time and will take into account notification to the supply chain, stock return, logistics for recovery, storage of recovered product, and disposal.		
3.13.3	The company shall provide written guidance and training for relevant staff regarding the type of event that would constitute an incident. Incidents may include: <ul style="list-style-type: none"> • disruption to normal production processes • disruption to key services such as water, energy, transport, refrigeration processes, staff availability and communications 		

	<ul style="list-style-type: none"> • events such as fire, flood or natural disaster • malicious contamination or sabotage • failure of, or attacks against, digital cyber-security. <p>Where products which have been released from the site could be affected by an incident, the need to withdraw products and, where appropriate, advise customers to withdraw and/or recall products shall be considered.</p> <p>A documented incident reporting procedure shall be in place.</p>		
3.13.4	The company shall determine and document the activity required to effectively manage an incident to prevent release of product where hygiene, safety or quality may have been affected.		
3.13.5	<p>A procedure to manage product recalls initiated by the brand owner or specifier shall be documented and include as a minimum:</p> <ul style="list-style-type: none"> • identification of the key personnel involved in assessing potential recalls, together with clearly defined responsibilities • a communications plan that includes methods of informing customers and (where necessary) regulatory bodies in a timely manner. 		
3.13.6	Where a site's products are involved in a product recall, the site shall assist with provision of information (such as traceability) as required.		
3.13.7	<p>The product withdrawal procedure shall be tested, at least annually, in a way that ensures its effective operation. Results of the test shall be retained and shall include timings of key activities.</p> <p>The results of the test, and of any actual withdrawals, shall be used to review the procedure and implement improvements as necessary.</p>		

4 Site standards

4.1 External standards			
	The site shall be of suitable size and construction, in a suitable location, and maintained to an appropriate standard to reduce the risk of contamination and facilitate the production of safe and legal products.		
Clause	Requirements	Conforms	Comments
4.1.1	Consideration shall be given to local activities and the site environment, which may have an adverse impact on the safety or quality of the finished product or raw materials, and measures shall be taken to prevent contamination. Where measures have been put in place to protect the site, they shall be regularly reviewed to ensure they continue to be effective (e.g. flood controls).		
4.1.2	The external areas shall be maintained in good order. Any grassed or planted areas surrounding buildings shall be regularly tended and well maintained. External traffic routes under site control shall be suitably surfaced to avoid contamination of the product.		
4.1.3	The building fabric shall be maintained to minimise potential for pest entry, ingress of water and other contaminants. External silos, pipework or other access points for the product and/or raw materials shall be appropriately sealed and secured. Where possible, a clean and unobstructed area shall be provided along the external walls of the buildings used for production and/or storage.		
4.1.4	Where natural external drainage is inadequate, additional drainage shall be installed. Drains shall be properly protected to prevent entry of pests.		
4.1.5	Where external storage of raw materials is necessary, these shall be protected in order to minimise the risk of contamination.		

4.2 Building fabric and interiors: raw materials handling, preparation, processing, packing and storage areas			
	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.		
Clause	Requirements	Conforms	Comments
4.2.1	Walls, floors, ceilings and pipework shall be maintained in good condition and shall facilitate cleaning.		
4.2.2	Where suspended ceilings exist, they shall be constructed, finished and maintained to prevent the risk of product contamination, and accessible for cleaning and inspection for pests unless the void is fully sealed.		
4.2.3	All internal drain openings shall be suitably protected against the entry of pests and designed to minimise odour.		
4.2.4	Where they constitute a risk to product, and based on the likelihood and risk of contamination, windows and roof glazing shall be protected against breakage.		
4.2.5	Where they constitute a risk to product, and based on the likelihood and risk of non- production glass contamination, all bulbs and strip lights, including those on flying-insect control devices, shall be adequately protected.		
4.2.6	Where elevated walkways are adjacent to or pass over production lines, based on risk they shall be: <ul style="list-style-type: none"> designed to prevent contamination of products and production lines easy to clean correctly maintained. 		
4.2.7	Suitable and sufficient lighting shall be provided to ensure a safe working environment, correct operation of processes, effective inspection of the product and cleaning.		
4.2.8	Suitable and sufficient ventilation shall be		

		provided.		
4.3 Utilities				
		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.		
Clause		Requirements	Conforms	Comments
4.3.1		All water used in the processing of the products or equipment cleaning shall be potable or suitably treated to prevent contamination.		
4.3.2		Based on risk assessment, the microbiological and chemical quality of water, steam, ice, air, compressed air or other gases which come into direct contact with packaging shall be regularly monitored. These shall present no risk to product safety or quality and shall comply with relevant legal regulations.		
4.4 Site security and product defence				
		A product defence plan shall be in place to ensure that there are systems to protect products, premises and brands from malicious actions while under the control of the site.		
Clause		Requirements	Conforms	Comments
4.4.1		<p>The company shall undertake a documented risk assessment (threat assessment) of the security arrangements and potential risks to the products from any deliberate attempt to inflict contamination or damage. This threat assessment shall include both internal and external threats.</p> <p>The output from this assessment shall be a documented product defence plan.</p> <p>Areas shall be assessed according to risk; sensitive or restricted areas shall be defined, clearly marked, monitored and controlled.</p> <p>This plan shall be kept under review to reflect changing circumstances and external influences. It shall be formally reviewed at least annually.</p>		

4.4.2	Measures shall be in place to ensure only authorised personnel have access to production and storage areas, and access to the site by employees, contractors and visitors shall be controlled. A visitor reporting system shall be in place. Staff shall be trained in site security procedures and encouraged to report unidentified or unknown visitors.		
4.4.3	External storage tanks, silos and any intake pipes with an external opening shall be sufficiently secure to prevent unauthorised access.		
4.5 Layout, product flow and segregation			
	The factory layout, flow of processes and movement of personnel shall be sufficient to prevent the risk of product contamination and to comply with all relevant legislation.		
Clause	Requirements	Conforms	Comments
4.5.1	There shall be a current map or plan of the site which defines: <ul style="list-style-type: none"> • access points for personnel • travel routes for personnel, raw materials and intermediate or finished products • staff facilities • routes for the removal of waste • production and process flows • storage areas. 		
4.5.2	The process flow from intake to dispatch shall be arranged to minimise the risk of contamination or damage to the product.		
4.5.3	Premises shall allow sufficient working space and storage capacity to enable all operations to be carried out properly under safe and hygienic conditions.		
4.5.4	Sorting or other activities involving the direct handling of the product shall take place in areas that have, as a minimum, the same standards as production areas.		
4.5.5	Activities that could produce a contamination risk, such as the removal of outer packaging, shall be carried out in a		

	designated, segregated area.		
4.5.6	If it is necessary to allow access through production areas, designated walkways shall be provided that ensure there is adequate segregation from materials.		
4.5.7	Where possible, all facilities shall be designed and positioned so that movement of personnel is by simple, logical routes.		
4.6 Equipment			
	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.		
Clause	Requirements	Conforms	Comments
4.6.1	Production, storage and warehousing equipment shall be designed for the intended purpose and shall minimise the risk of contamination to the product. Lubrication points and application methods of any lubricant shall not be able to contaminate the product. Equipment shall be constructed of suitable materials and be designed to ensure it can be effectively cleaned and maintained.		
4.6.2	Newly installed equipment shall be properly specified before purchase. New equipment shall be tested and commissioned prior to use and a maintenance and cleaning programme established.		
4.6.3	Wooden equipment including desks, chairs, tables, etc. shall be properly sealed to enable effective cleaning. This equipment shall be kept clean, in good condition and free from splinters or other sources of physical contamination.		
4.6.4	Notices on equipment shall be cleanable and secure.		

4.7 Maintenance			
	An effective maintenance programme shall be in operation for plant and equipment to prevent contamination and reduce the potential for breakdowns.		
Clause	Requirements	Conforms	Comments
4.7.1	A documented programme of maintenance shall be operated, covering all items of production equipment and plant critical to product safety, legality and quality, to prevent contamination and reduce the risk of breakdown.		
4.7.2	Maintenance logs shall be maintained for all off-line testing equipment. This shall include, as a minimum: <ul style="list-style-type: none"> any adjustments the re-calibration date of any interventions. 		
4.7.3	In addition to any planned maintenance programme, where there is a risk of product contamination by foreign bodies arising from equipment failure or damage, the equipment shall be inspected at predetermined intervals, inspection results documented, and appropriate action taken.		
4.7.4	Maintenance work shall not place product safety, quality or legality at risk. Maintenance work shall be followed by a documented clearance procedure which records that contamination hazards have been removed and equipment cleared to resume production.		
4.7.5	Tools and other maintenance equipment shall be cleared away after use and appropriately stored.		
4.7.6	Temporary repairs/modifications using tape, cardboard, etc. shall only be permitted in emergencies and where product contamination is not at risk. Such modifications shall be subject to a time limit and shall be recorded and scheduled for correction.		
4.7.7	Engineering workshops shall be controlled to prevent transfer of engineering debris to production or storage areas (e.g. by		

	provision of swarf mats).		
4.7.8	Contractors involved in maintenance or repair shall be suitably monitored by a staff member who shall be responsible for their activities.		
4.8 Housekeeping and cleaning			
Fundamental	Housekeeping and cleaning systems shall be in place which ensure that appropriate standards of hygiene are maintained and that the risk of product contamination is minimised.		
Clause	Requirements	Conforms	Comments
4.8.1	Good standards of housekeeping shall be maintained, which shall include a condition-based cleaning or 'clean as you go' policy.		
4.8.2	<p>Documented cleaning procedures shall be in place and maintained for buildings, equipment and vehicles. Cleaning schedules and procedures shall include the following information:</p> <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. <p>The frequency and methods of cleaning shall be based on risk.</p> <p>The procedures shall be implemented to ensure that appropriate standards of cleaning are achieved.</p>		
4.8.3	Cleaning chemicals shall be fit for purpose, suitably labelled, and used in accordance with manufacturers' instructions. They shall be stored in a secured, designated location, in closed containers. Chemicals that are strongly scented or could give rise to taint and odour contamination shall not be used. Cleaning equipment shall be kept in a suitable designated location.		
4.8.4	Materials and equipment used for cleaning toilets shall be differentiated from those used elsewhere, and physically segregated		

	where necessary.		
4.8.5	<p>Where appropriate, based on risk, a microbiological environmental monitoring programme shall be in place to ensure that the cleaning operations are effective in minimising the risk of contamination by microorganisms that would be detrimental to the products. The programme shall consider the likelihood of the microorganisms' survival on packaging materials and their use.</p> <p>Where a programme is in place, this shall include:</p> <ul style="list-style-type: none"> • sampling protocol • identification of sample locations • frequency of tests • target organisms (e.g. pathogens, spoilage organisms and/or indicator organisms) • test methods • recording and evaluation of results. <p>The programme and its associated procedures shall be documented.</p>		
4.9 Product contamination control			
	All practicable steps shall be taken to identify, eliminate, avoid or minimise the risk of foreign-body or chemical contamination.		
4.9.1 Glass, brittle plastics, ceramics and similar materials control			
Clause	Requirements	Conforms	Comments
4.9.1.1	<p>There shall be no unnecessary non-production glass, ceramics or brittle plastic present, which may pose a foreseeable risk of contamination.</p> <p>Where non-production glass, ceramics or brittle plastics are required in production, packing or storage areas, and where there is a risk of product contamination, procedures for their handling shall be in place.</p>		
4.9.1.2	Glass or brittle plastics (other than the product) that pose a potential product contamination hazard shall be controlled and recorded on a register that includes, as		

	<p>a minimum:</p> <ul style="list-style-type: none"> • a list of items detailing location, number, type and condition • recorded checks of condition of items, carried out at a specified frequency that is based on the level of risk to the product • details on cleaning or replacing items to minimise the potential for product contamination. <p>Glass or brittle plastics not in the production or storage areas shall be included in the register on the basis of risk.</p>		
4.9.1.3	<p>Where non-production glass or brittle plastic breakage occurs, a responsible person shall be placed in charge of the clean-up operation and shall ensure that no other area is allowed to become contaminated due to the breakage. Any product that has become contaminated shall be segregated and disposed of.</p> <p>All breakages shall be recorded in an incident report.</p>		
4.9.2 Sharps and metal control			
Clause	Requirements	Conforms	Comments
4.9.2.1	<p>There shall be a documented policy for the controlled use and storage of sharp implements, including knives, needles and wires, to prevent contamination.</p> <p>The policy shall include control of these items into and out of the site.</p>		
4.9.2.2	<p>Production equipment that incorporates blades or sharps shall be monitored. Blades or other sharp implements shall not be allowed to contaminate the product.</p>		
4.9.2.3	<p>Snap-off blade knives shall not be used.</p>		
4.9.2.4	<p>Where open noticeboards are present in production, packing and storage areas, loose fastenings, such as drawing pins and staples, shall not be used.</p>		
4.9.3 Chemical and biological control			

Clause	Requirements	Conforms	Comments
4.9.3.1	Processes shall be in place to manage the use, storage and handling of non-production chemicals, to prevent chemical contamination. These shall include, as a minimum: <ul style="list-style-type: none"> a list of approved chemicals for purchase availability of material safety data sheets and specifications avoidance of strongly scented products the labelling and/or identification of containers of chemicals at all times designated storage area with access restricted to authorised personnel use by trained personnel only. 		
4.9.3.2	Hazard and risk analysis shall be used to identify, control and manage any potential risks from microbiological contamination and any potential allergens.		
4.10 Waste and waste disposal			
	Waste disposal shall be managed in accordance with legal requirements and to prevent accumulation, risk of contamination and the attraction of pests.		
Clause	Requirements	Conforms	Comments
4.10.1	Where licensing is required by law for the removal of waste, it shall be removed by licensed contractors and records of removal shall be maintained and available for audit.		
4.10.2	Process waste shall be managed to minimise release to the environment. This shall include, but is not limited to, pellet, flake, powder, dust and offcuts.		
4.10.3	Suitable and sufficient refuse and waste containers shall be provided, which shall be emptied at appropriate frequencies and maintained in an adequately clean condition.		
4.10.4	Where appropriate, waste shall be categorised according to legislative requirements based on the intended means of disposal (such as recycling), and sorted, segregated and collected in appropriate		

	designated waste containers.		
4.10.5	Substandard trademarked materials shall be rendered unusable through a destructive process. All materials disposed of shall be recorded.		
4.10.6	If substandard trademarked materials are transferred to a third party for destruction or disposal, that third party shall be a specialist in appropriate waste disposal and shall provide records of material destruction.		
4.10.7	External storage of refuse shall be in designated areas and designed or maintained to minimise the risk of pest harbourage.		
4.11 Pest management			
	In order to minimise the risk of infestation and risk to products, the whole site shall have an effective preventive pest management programme in place and the resources available to respond immediately to any issues which occur.		
Clause	Requirements	Conforms	Comments
4.11.1	A preventive pest management programme shall be maintained, covering all areas of the site under the site's control. The site shall assess the suitability of its pest management programme to address variation in pest activity through different seasons, and consider any additional preventive activity required. The site shall document and implement any required additional activity.		
4.11.2	The site shall either contract the services of a competent pest management organisation or have appropriately trained staff for the regular inspection and treatment of the site in order to deter and eradicate infestation. The frequency of inspections shall be determined by risk assessment and documented. The risk assessment shall be reviewed whenever: <ul style="list-style-type: none"> there are changes to the building or production processes which could have an impact on the pest management programme 		

	<ul style="list-style-type: none"> there has been a significant pest issue. <p>Where the services of a pest management contractor are employed, the service contract shall be clearly defined and reflect the activities of the site.</p>		
4.11.3	<p>Where a site undertakes its own pest management, it shall be able to demonstrate that:</p> <ul style="list-style-type: none"> pest management operations are undertaken by trained and competent staff with sufficient knowledge to select appropriate pest control chemicals and proofing methods and understand the limitations of use, relevant to the biology of the pests associated with the site staff undertaking pest management activities meet any legal requirements for training or registration sufficient resources are available to respond to any infestation issues there is ready access to specialist technical knowledge when required legislation governing the use of pest control products is understood and complied with dedicated locked facilities are used for the storage of pesticides. 		
4.11.4	<p>Equipment such as bait stations, traps or electric fly-killing devices shall be appropriately located and operational.</p>		
4.11.5	<p>Effective precautions shall be in place to prevent pests entering the premises. The building shall be suitably proofed against the entry of all pests via doors, windows, ducts and cable entry points.</p> <p>This shall include measures to prevent birds and flying mammals from entering buildings or roosting above loading or unloading areas.</p>		
4.11.6	<p>In the event of infestation, immediate action shall be taken to eliminate the hazard. Action shall be taken to identify, evaluate the potential for contamination or damage, and authorise the release of any</p>		

	product potentially affected.		
4.11.7	<p>In the event of an infestation, and at appropriate intervals, the site shall request a catch analysis from flying-insect control devices to help identify problem areas.</p> <p>In the event of increase in activity, the site shall use risk assessment to determine the activity required to eliminate the hazard.</p>		
4.11.8	<p>Documented procedures and detailed records of pest activity, pest management inspections and recommendations shall be maintained. These shall include, as a minimum:</p> <ul style="list-style-type: none"> • an up-to-date, signed and authorised site plan identifying numbered pest control devices and their locations • identification of the baits and/or monitoring devices on site • clearly defined responsibilities for the site management and the contractor • details of pest control products used and instructions for their effective use • detailed records of inspections, recommendations and of any pest infestation. <p>It shall be the responsibility of the site to ensure that all the relevant recommendations made by the contractor or in-house expert are implemented in a timely manner and monitored for efficacy.</p>		
4.11.9	Employees shall understand the signs of pest activity and be aware of the need to report any evidence to a designated manager.		

5 Product and process control

5.1 Product development			
	Documented product development or modification procedures shall be in place to ensure the production of safe and legal products to defined quality parameters.		
Clause	Requirements	Conforms	Comments
5.1.1	<p>Customer requirements relating to the design, development, specification, manufacture and distribution of the product shall be documented and agreed with the customer.</p> <p>This shall take into consideration process requirements and end use, where possible. Any critical-use parameters shall be identified and defined; for example, barrier requirements, maximum/minimum use temperature, machine running, use of recycled materials, and testing requirements (including migration, where relevant).</p> <p>Special attention shall be paid to any materials that are required or requested to be manufactured from recycled materials, to ensure that they are both appropriate and legal.</p>		
5.1.2	<p>The site shall clearly define and document when a production trial is required.</p> <p>The site shall determine the outputs and success criteria required from a production trial, and any changes and/or additions made to materials, processing characteristics or equipment as a result of the trial.</p> <p>Where appropriate, production trials shall be carried out and testing shall validate that manufacturing processes are capable of producing a safe and legal product to defined quality parameters. New products or product changes shall be subject to suitable evaluation to ensure that required safety and quality parameters can be achieved.</p>		
5.1.3	The company shall ensure that production is		

		carried out using defined operating conditions which result in safe and legal products to defined quality parameters.		
5.1.4		Where required by the customer, a technical product specification shall be prepared and, where possible, agreed with the customer or brand owner before the production process begins.		
5.1.5		Samples as agreed with the specifier shall be retained for future reference.		
5.1.6		<p>A documented procedure shall in be in place to address the transfer of customer specifications or requirements to the site's own systems. This shall include (but is not limited to):</p> <ul style="list-style-type: none"> • validation of accuracy of data transferred • how changes to customer specifications are updated and communicated • how the agreed requirements for customer testing methods are met • evaluation of how changes made to the customer specifications affect the technical product specification (see clause 5.1.1). <p>Settings derived from successfully conducted production trials or equipment installations shall be transferred accurately to process control documentation.</p>		
5.2 Graphic design and artwork control				
		Artwork and all pre-press processes conducted by the site shall be managed to ensure that loss of information and variation from the customer's specifications are eliminated.		
Clause	Requirements	Conforms	Comments	
5.2.1	<p>The site shall have a documented artwork management procedure covering the activities for which the site has responsibility. This may include, but is not limited to:</p> <ul style="list-style-type: none"> • collation of information to be included into artwork • receipt of artwork files from the customer 			

		<ul style="list-style-type: none"> verification of completed artwork and approval by the customer. 		
5.2.2		<p>A process shall be in place to seek formal acceptance and approval of final product concepts and artworks by the specifier.</p> <p>The outcome shall be documented.</p>		
5.2.3		Where appropriate, print trials shall be carried out and testing shall validate that the agreed product quality and print standards can be consistently achieved.		
5.2.4		Printing equipment such as plates, silk screens, anilox rollers, cylinders and blankets shall be verified as being correct to specification and artwork version or agreed master prior to use, and fully traceable to the customer's approved origination material.		
5.2.5		<p>Customer-approved reference material, including artwork masters and colour standards used during print runs, shall be controlled to ensure minimisation of degradation and shall be returned to appropriate storage after use.</p> <p>The site shall have a policy to address requirements for the renewal of approved masters, as necessary.</p>		
5.2.6		The site shall have a documented procedure for managing changes to artwork and print specifications to manage obsolete artwork and printing materials.		
5.2.7		Where artwork files and approved masters are in electronic form, these shall be suitably protected to prevent loss or malicious intervention.		
5.3 Packaging print control				
		Where packaging materials are printed or decorated, documented procedures shall be in place to ensure that the information is fully legible and correctly reproduced to customer specification and complies with any legal requirements.		
Clause		Requirements	Conforms	Comments
5.3.1		An assessment shall be carried out for the pre-press activity, print process and handling of printed packaging (product) to		

		<p>identify:</p> <ul style="list-style-type: none"> risks of loss of essential information mixing of printed product. <p>Controls shall be established and implemented to reduce the risks identified.</p>		
5.3.2		Printing plates, cylinders, cutting dies, print blankets and any other printing equipment shall be appropriately stored to minimise damage.		
5.3.3		Each print run shall be approved against the agreed standard (or master sample). This shall be recorded.		
5.3.4		A system shall be in place to detect and identify printing errors during the run and to sort these errors from the acceptable printed material.		
5.3.5		Where composite print is used (a mixture of different designs printed together), a process shall be in place to ensure effective segregation of differing print variants.		
5.3.6		Samples of printed packaging shall be retained together with production records for a period of time to be agreed with the customer/specifier/brand owner.		
5.3.7		Any unused printed product shall be accounted for and either disposed of or identified and appropriately stored.		
5.3.8		Lighting in print inspection cabinets and other means of print/colour checking shall be agreed with the customer or conform to accepted industry standards.		
5.4 Process control				
Fundamental	Documented procedures, work instructions and process specifications shall be in place to ensure effective quality assurance of operations throughout the process.			
Clause	Requirements	Conforms	Comments	
5.4.1	The hazard and risk management team shall identify and record all potential product defects that are reasonably expected to occur at each step in relation to the product and process. The hazards considered shall include, where applicable:			

	<ul style="list-style-type: none"> • product quality defects • defects that may have an impact on the functional integrity and performance of the final product in use • defects which result in the production of products which are outside customer-specified quality parameters. 		
5.4.2	A review of the manufacturing and, where applicable, printing process shall identify manufacturing process control points that can prevent or limit the risk of producing products with quality defects.		
5.4.3	For each manufacturing process control point, machine settings or process limits shall be established and documented – the process specification.		
5.4.4	Where equipment settings are critical to the safety or legality of the product, changes to the equipment settings shall only be completed by trained and authorised staff. Where applicable, controls shall be password-protected or otherwise restricted.		
5.4.5	A bill of materials and process specification (including manufacturing process control points) shall be available for each batch or lot during production.		
5.4.6	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.		
5.4.7	A documented clearance procedure shall be in place to ensure that at start-up the line is clear of all previous work and production documents.		
5.4.8	In the event of changes to product composition, processing methods or equipment, the site shall, where appropriate, re-establish process characteristics and validate product data to ensure that product safety, legality and quality are achieved.		

5.4.9	<p>The documented line clearance procedure shall include:</p> <ul style="list-style-type: none"> • the roles of persons involved in line clearance • areas where materials can become trapped • validation of the line clearance • sign-off for continuing production. <p>The line clearance procedure shall be fully implemented for each production run.</p>		
5.5 Calibration and control of measuring and monitoring devices			
	The site shall be able to demonstrate that measuring and monitoring equipment is sufficiently accurate and reliable to provide confidence in measurement results.		
Clause	Requirements	Conforms	Comments
5.5.1	<p>The site shall identify and control in-line and off-line measuring equipment used to monitor critical control points (where applicable) and product safety, quality and legality. This shall include, as a minimum:</p> <ul style="list-style-type: none"> • a documented list of equipment and its location • an identification code and calibration due date • prevention from adjustment by unauthorised staff • protection from damage, deterioration and misuse. 		
5.5.2	<p>All identified measuring equipment shall be checked and adjusted at a predetermined frequency, based on risk analysis. This shall be carried out by trained staff to a defined method to ensure accuracy within defined parameters. All results shall be documented.</p> <p>Where possible, calibration shall be traceable to a recognised national or international standard. Where a traceable calibration is not possible, the site shall demonstrate the basis by which standardisation is carried out.</p>		
5.5.3	Corrective action and reporting procedures shall be established and documented in the event of the monitoring and testing		

	<p>procedure identifying any failure of product inspection, testing or measuring equipment. Any such failures shall be subject to an assessment of potential risk; subsequent action may include a combination of isolation, quarantine and re- inspection of products produced since the last acceptance test of the equipment.</p> <p>The site shall conduct a root cause analysis into the equipment failure and implement the appropriate corrective action.</p>		
5.6 Product inspection, testing and measuring			
	The company shall undertake appropriate inspections and analyses that are critical to product safety, legality, integrity and quality.		
Clause	Requirements	Conforms	Comments
5.6.1	<p>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. The frequency of checks and sampling shall be in accordance with industry-accepted practice or customer requirements and based on risk analysis.</p> <p>The site shall define how samples used for checking in-process quality are disposed of. This may be by returning to stock, regrounding/recycling, or segregation and disposal.</p>		
5.6.2	Hazard and risk analysis principles shall be used to determine the need for in-line product testing equipment to ensure product safety, quality and legality.		
5.6.3	The accuracy of in-line equipment shall be specified (with permitted tolerances), having due regard to the product parameter being controlled.		
5.6.4	<p>The company shall establish, document and implement procedures for the operation, routine monitoring and testing of all equipment used in product inspection, testing and measurement. This shall include:</p> <ul style="list-style-type: none"> frequency and sensitivity of checks 		

	<ul style="list-style-type: none"> • authorisation of trained personnel to carry out specified tasks • documentation of test results. 		
5.6.5	<p>Routine off-line quality checks shall be carried out at appropriate stages in production to demonstrate that the product is within the tolerances laid down in the agreed product specification.</p> <p>A system that includes off-line or randomised quality checks shall be in place to identify and remove non-conforming product from the production lot.</p>		
5.6.6	<p>In-line testing equipment critical to product quality or safety shall incorporate a system to identify non-conforming product for removal or divert it out of the product flow.</p>		
5.6.7	<p>Test methods, analytical methods and customer-approved reference samples (where required) shall be of the most recent version and be available in the laboratory or where off-line testing is conducted.</p> <p>Samples shall be suitably stored to avoid degradation.</p>		
5.6.8	<p>The test methods used by the site in both on-line and off-line testing shall be validated to ensure their sensitivity, reproducibility and range, in addition to any other relevant criteria.</p> <p>Where standardised tests are used, the site shall ensure prescribed methodologies are followed.</p> <p>Where testing shows out-of-specification results, a documented procedure for investigating these results shall be established and followed to determine whether the cause is non-conforming product or a testing failure.</p>		
5.6.9	<p>Where automated inspection equipment (e.g. vision systems) is used to check print or other material features, the site shall establish and implement procedures for the operation and testing of the equipment to ensure that it is correctly set up and capable of alerting or rejecting the packaging when it is out of specification.</p>		

	<p>As a minimum, testing of the equipment shall be completed at:</p> <ul style="list-style-type: none"> the start of the production run the end of the production run a frequency based on the site's ability to identify, hold and prevent the release of any implicated materials should the equipment fail (e.g. during the production run or when changing batches of raw materials). <p>The site shall establish and implement procedures in the event of a failure in the equipment (e.g. a documented and trained manual checking procedure).</p>		
5.6.10	<p>Where the company undertakes or subcontracts an analysis critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025 for the test undertaken (General requirements for the competence of testing and calibration laboratories). Documented justification shall be available where accredited methods are not undertaken.</p> <p>The significance of the laboratory results shall be understood and acted upon accordingly.</p>		
5.7 Control of non-conforming product			
	The site shall ensure that out-of-specification product is clearly identified and effectively managed to prevent unauthorised release.		
Clause	Requirements	Conforms	Comments
5.7.1	Clear procedures for the control of out-of-specification or non-conforming materials shall be in place, documented and understood by all personnel. These shall include the effective identification and management of materials before a decision has been made on their final disposition.		
5.7.2	Non-conforming materials shall be assessed and a decision taken to reject, accept by concession, rework or put to alternative use. The decision and reasons shall be		

	documented.		
5.8 Incoming goods			
	The site shall ensure that incoming goods are appropriately checked for contents, packaging integrity and potential contamination.		
Clause	Requirements	Conforms	Comments
5.8.1	<p>The site shall document a raw materials and intermediate product intake procedure to ensure that incoming goods match purchase or product specifications. This may take the form of:</p> <ul style="list-style-type: none"> • purchase orders • delivery notes. 		
5.8.2	<p>There shall be a procedure for the inspection of loads on arrival to ensure that products are free from pest infestation, contamination or damage and are in a satisfactory condition.</p> <p>Unloading areas for bulk deliveries shall be clearly identified and designed to prevent product mix-ups.</p> <p>Regarding raw materials, all complaints or defects identified by the site shall be recorded and investigated (including root cause analysis) and the results of the investigation documented.</p>		
5.8.3	<p>The site shall have a procedure for the acceptance of raw materials. This may include a valid certificate of analysis (CoA) or testing.</p> <p>All raw materials awaiting the results of in-house testing or verification of data shall be held until released for use.</p>		
5.8.4	<p>Receipt documents and/or product identification shall facilitate correct stock rotation of goods in storage and, where appropriate, ensure materials are used in the correct order and within the prescribed shelf life.</p>		
5.8.5	<p>The site shall have a system in place to validate all raw materials and intermediate products prior to their introduction to the process.</p>		

5.9 Storage of all materials and intermediate and finished products			
	The handling, management and storage of all materials and products shall minimise the risk of contamination or malicious intervention, and protect product safety, quality and legality.		
Clause	Requirements	Conforms	Comments
5.9.1	<p>Procedures to maintain product safety and quality during storage shall be risk-based, understood by the relevant staff, and implemented accordingly. They shall include, as appropriate:</p> <ul style="list-style-type: none"> • instructions for the packing of finished product • segregation of products where necessary to avoid cross-contamination (physical, microbiological or allergenic), mixing of sorts, or taint • storage of product/materials off the floor and away from walls • specific handling or stacking requirements to prevent product damage. 		
5.9.2	All materials, work in progress and finished product shall be properly identified and protected during storage by appropriate packaging to protect them from contamination.		
5.9.3	Storage, including off-site storage, shall be controlled to protect the product from contamination, including taint or odour and malicious intervention. Where off-site storage is used, the same site standards apply as for on-site storage.		
5.9.4	<p>Finished or intermediate product storage shall meet customer requirements (with regard to first in, first out (FIFO), where applicable), with dispatch after positive release.</p> <p>Where external storage of finished product is required, the product shall be suitably protected.</p>		
5.9.5	Packaging used for storage or dispatch of intermediate or finished products, such as pallets, shall be appropriately protected if		

	stored outside and inspected for signs of damage or contamination prior to use.		
5.9.6	In order to prevent contamination, documented procedures shall be in place to appropriately segregate raw materials, intermediate products and finished products.		
5.9.7	The site shall ensure that hazardous chemicals are handled in such a way that risk to product safety, quality and legality is minimised.		
5.9.8	Material intended for recycling shall be appropriately protected against contamination hazards.		
5.10 Dispatch and transport			
	The dispatch and transport of raw materials and finished products shall be undertaken in a manner that minimises the risk of contamination or malicious intervention and maintains product safety, legality and quality.		
Clause	Requirements	Conforms	Comments
5.10.1	The company shall have procedures for the dispatch and transport of products, which shall include: <ul style="list-style-type: none"> any restrictions on the use of combined loads (e.g. where materials from other companies are in the same transport) requirements for the security of products during transit, particularly when vehicles are parked and unattended away from a designated storage depot. 		
5.10.2	All products and materials shall be identified and either protected during distribution by appropriate external packaging or transported under conditions to protect the product from contamination. This shall include the risk of taint or odour and of malicious intervention.		
5.10.3	All pallets shall be checked. Damaged, contaminated or unacceptable pallets shall be discarded. Wooden pallets that come into direct contact with finished products or raw materials shall not be allowed to contaminate the product. Wooden pallets, if		

	used, shall be sound, dry, clean and free from damage and contamination.		
5.10.4	All company-owned or leased vehicles used for deliveries shall be included in the documented cleaning schedules and kept clean and in a condition that minimises the risk of product contamination.		
5.10.5	All delivery vehicles and shipping containers shall be subject to a documented hygiene and odour checking procedure before loading.		
5.10.6	Where the company employs third-party contractors, there shall be a contract or agreed terms and conditions. All the requirements specified in this section shall be clearly defined in the contract or the company shall be certificated to the Global Standard for Storage and Distribution. Where this is not possible, with general carriers, the packaging shall be adequate to protect the product against damage, contamination hazards, taint and odour.		
5.10.7	Vehicle drivers shall comply with the site rules relevant to this Standard. Access to the site for third-party transport personnel shall be controlled and, where possible, facilities provided to negate the need to enter storage or production areas.		

6 Personnel

6.1 Training and competence: raw materials handling, preparation, processing, packing and storage areas			
Fundamental		The company shall ensure that all personnel performing work that affects product safety, legality and quality are adequately trained, instructed and supervised commensurate with their activity and that they are competent to undertake their job role.	
Clause	Requirements	Conforms	Comments
6.1.1	All personnel, including temporary personnel and contractors, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period. Induction training shall include the company hygiene rules.		
6.1.2	<p>Where personnel are engaged in activities relating to product safety, quality and legality, relevant training and competency assessment shall be in place. This may include, but is not limited to:</p> <ul style="list-style-type: none"> • product inspection, testing and measuring • calibration • printed packaging controls • operatives at manufacturing process control points • laboratory testing • product defence. 		
6.1.3	The site shall define and document how new or changed procedures, working methods and practices related to product safety or quality are communicated to relevant personnel.		
6.1.4	The company shall routinely review and document the competencies of all staff and provide relevant training as appropriate. This may be in the form of training, refresher training, coaching, mentoring or on-the-job experience.		
6.1.5	Records of training shall be available.		

	<p>These shall include:</p> <ul style="list-style-type: none"> the name of the trainee and confirmation of attendance the date and duration of the training the title or course contents, as appropriate the training provider (external or internal provider). <p>Where training is undertaken by agencies on behalf of the company, records of the training shall be available.</p>		
6.1.6	<p>The site shall put in place documented programmes covering the training needs of relevant personnel. These shall include, as a minimum:</p> <ul style="list-style-type: none"> identifying the necessary competencies for specific roles providing training or other action to ensure staff have the necessary competencies reviewing the effectiveness of training and trainers the delivery of training in the appropriate language of trainees. 		
6.2 Personal hygiene: raw materials handling, preparation, processing, packing and storage areas			
	<p>The site's personal hygiene standards shall be developed to minimise the risk of product contamination from personnel. These standards shall be appropriate to the products produced and be adopted by all personnel, including agency-supplied staff, contractors and visitors to the production facility.</p>		
Clause	Requirements	Conforms	Comments
6.2.1	<p>The requirements for personal hygiene at sites producing materials for direct contact with food or other hygiene-sensitive products shall be documented and communicated to all personnel. These shall include, as a minimum, the following instructions:</p> <ul style="list-style-type: none"> wrist bands, wrist-worn devices or watches shall not be worn jewellery including piercings shall 		

	<p>not be worn on exposed parts of the body, with the exception of a plain wedding ring, wedding wristband or medical alert jewellery</p> <ul style="list-style-type: none"> • fingernails shall be kept short and clean and free from nail varnish • false fingernails and nail art shall not be worn • excessive perfume or aftershave shall not be worn. <p>Requirements at sites producing materials not for contact with food shall be based on risk assessment.</p> <p>Compliance with the site's requirements shall be checked routinely.</p>		
6.2.2	Hand-washing shall be performed on entry to the production areas and at a frequency that is appropriate to minimise the risk of product contamination.		
6.2.3	Personal items and belongings, including personal mobile phones, shall not be taken into production areas without the permission of the management.		
6.2.4	The site shall use risk assessment to determine the procedures and written instructions necessary to control the use and storage of personal medicines in production and storage areas, to minimise the risk of product contamination.		
6.2.5	Where visitors cannot comply with site hygiene rules, suitable control procedures shall be in place (e.g. non-handling of product, use of gloves).		
6.2.6	All cuts and grazes on exposed skin shall be covered by an appropriately coloured plaster that is different from the product colour (preferably blue). These shall be site-issued and monitored when people are involved in work with materials intended to come		

	into direct contact with food or other hygiene-sensitive products. Where appropriate, in addition to the plaster, a finger stall or glove shall be worn.		
6.3 Staff facilities			
	Staff facilities shall be sufficient to accommodate the required number of personnel and shall be designed and operated to minimise the risk of product contamination. Such facilities shall be kept in a good and clean condition.		
Clause	Requirements	Conforms	Comments
6.3.1	Locker rooms shall be accessed without the need to enter production areas unless appropriately segregated walkways are in place.		
6.3.2	Lockers shall be provided for all personnel who work in raw material handling, processing, preparation, packing and storage areas. Lockers shall be of sufficient size to accommodate all reasonable personal items and any protective clothing required.		
6.3.3	Site-issued protective clothing and personal clothing shall not be stored in the same locker or shall be appropriately segregated based on risk within the locker.		
6.3.4	Eating (including the eating of confectionery and chewing of gum or tobacco), drinking and smoking shall not be allowed in locker and changing rooms.		
6.3.5	<p>Suitable and sufficient hand-washing facilities shall be available to enable cleaning of hands before commencing work, after breaks, and as necessary during the course of work. Such hand-washing facilities shall provide, as a minimum:</p> <ul style="list-style-type: none"> • sufficient quantity of water at a suitable temperature to encourage hand-washing • unscented liquid soap or foam • adequate hand-drying facilities • advisory signs to prompt use 		

	<p>(including signs in appropriate languages).</p> <p>Where materials are handled that will be in direct contact with food or other hygiene- sensitive products, hand-washing facilities shall be sited at the entrance to the production area.</p>		
6.3.6	Toilets shall not open directly into storage, processing or production areas in order to prevent the risk of contamination to product. Toilets shall be provided with suitable and sufficient hand-washing facilities.		
6.3.7	Facilities for visitors and contractors shall enable compliance with the site's hygiene policy.		
6.3.8	<p>All food brought into manufacturing premises shall be stored in a clean and hygienic state.</p> <p>No food shall be taken into storage, processing or production areas.</p>		
6.3.9	Eating (including the eating of confectionery and chewing of gum or tobacco), drinking and smoking shall not be allowed in the production or storage areas. If it is impractical for personnel to leave their work area, local controlled facilities (such as a fully walled area with hand-washing facilities) shall be provided.		
6.3.10	Drinking of water from purpose-made dispensers and/or by using disposable conical cups or spill-proof lidded containers may be allowed, provided it is confined to a designated area away from equipment.		
6.3.11	Where smoking is allowed under national law, it shall only be permitted in designated controlled smoking areas which shall be isolated from production and storage areas and fitted with extraction equipment to the exterior of the building. Adequate arrangements for dealing with smokers' waste shall also be provided at smoking facilities,		

	<p>both inside buildings and at external locations.</p> <p>The use of electronic cigarettes and associated materials shall not be permitted in locker rooms, nor in production or storage areas, and shall only be permitted in designated smoking areas.</p>		
6.4 Medical screening			
	<p>Sites that manufacture packaging for direct contact with food or other hygiene-sensitive products shall ensure that documented procedures are in place to ensure that health conditions likely to adversely affect product safety are monitored and controlled.</p>		
Clause	Requirements	Conforms	Comments
6.4.1	<p>Where there is handling of materials intended for direct contact with food or other hygiene-sensitive products, the site shall make employees aware of the symptoms of infection, disease or condition which would prevent a person working. The site shall have a procedure for the notification by personnel, including temporary personnel, of any relevant infections, diseases or conditions with which they may have been in contact or be suffering from.</p> <p>Employees, contractors and visitors suffering from any of the above shall be excluded from work involving the handling of direct food contact or other hygiene-sensitive product packaging for as long as the symptoms persist.</p>		
6.4.2	<p>Where permitted by law, visitors and contractors shall be required to fill in a health questionnaire or otherwise confirm that they are not suffering from any symptoms which may put product safety at risk, prior to being allowed into production, packing or storage areas.</p>		
6.4.3	<p>Medical screening for sites producing materials that will not come into direct contact with food or other hygiene-</p>		

	sensitive products shall be implemented on the basis of risk.		
6.5 Protective clothing			
	Appropriate protective clothing shall be worn in production and storage areas to minimise the risk of product contamination.		
Clause	Requirements	Conforms	Comments
6.5.1	<p>Hair coverings and/or beard snoods, where appropriate, shall be worn in production areas at sites manufacturing materials for direct contact with food or other hygiene-sensitive products.</p> <p>Hazard and risk principles shall be used to determine the need for any other protective clothing, including garments and footwear in areas handling raw materials, and in preparation, production and storage areas.</p> <p>Where risk assessment has determined that protective clothing is not required in a particular area, it shall be fully justified and not pose a contamination risk to the product.</p>		
6.5.2	<p>The company shall use risk assessment to determine, document and communicate to all employees, including temporary personnel and contractors, the rules regarding the wearing of protective clothing in all situations, including:</p> <ul style="list-style-type: none"> • during the journey to work • in raw materials handling, preparation, production and storage areas • when away from the production environment (e.g. removal before entering toilets, canteen or smoking areas). 		
6.5.3	Where protective clothing is required, appropriate clean protective clothing that cannot contaminate the product shall be worn. Sufficient sets of clothing appropriate to the activities being carried out shall be provided.		

6.5.4	Protective clothing worn in production areas shall provide adequate coverage. Where there is handling of materials intended for direct contact with food or other hygiene-sensitive products, the clothing shall have no external pockets on the upper body garments or sewn-on buttons. Changes of such clothing shall be available at all times as required.		
6.5.5	Based on the assessment of risk to the product, suitable footwear shall be worn within the factory environment.		
6.5.6	If gloves are used they shall be replaced regularly, be distinctive, intact and not cause a contamination risk to the product.		
6.5.7	Protective clothing shall be kept clean and laundered. Laundering shall be carried out by one of the following methods: <ul style="list-style-type: none"> • professional laundry service • in-house • controlled laundering facilities • home laundry. 		
6.5.8	Where home laundry is permitted, the site shall ensure that: <ul style="list-style-type: none"> • employees have received written instructions regarding the laundering process to be used and these shall be reinforced as part of an induction or other in-house training programme • employees shall be provided with a bag or other suitable means to safely transport washed garments from home to the workplace • there shall be a defined process within the site for monitoring the effectiveness of the system • there shall be a procedure and system for dealing with any case where employees are unable to perform home laundry effectively, either through lack of diligence or 		

	inadequate facilities.		
6.5.9	Clean and dirty clothing shall be segregated and controlled to prevent cross-contamination.		
6.5.10	Disposable protective clothing, if used, shall be subject to adequate control to avoid product contamination.		

7 Requirements for traded products

7.1 Approval and performance monitoring of manufacturers/packers of traded packaging products			
	The company shall operate procedures for approval of the last manufacturer or packer of packaging products which are traded to ensure that traded packaging products are safe, legal and manufactured in accordance with any defined product specifications.		
Clause	Requirements	Conforms	Comments
7.1.1	<p>The company shall have a documented supplier approval procedure which identifies the process for initial and ongoing approval of suppliers and the manufacturer/processor of each product traded. The requirements shall be based on the results of a risk assessment which shall include consideration of:</p> <ul style="list-style-type: none"> the nature of the product and associated risks customer-specific requirements legislative requirements in the country of sale or importation of the product the brand identity of the products (i.e. customer own brand or branded product). 		
7.1.2	<p>The company shall have a procedure for the initial and ongoing approval of the manufacturers of products. This approval procedure shall be based on risk and include either one or a combination of:</p> <ul style="list-style-type: none"> a valid certification to the applicable Global Standard or other GFSI-benchmarked standard. The scope of the certification shall include the products purchased supplier audits, with a scope to include product safety, traceability, hazard and risk management systems review and good manufacturing practices, undertaken by an experienced and demonstrably competent product safety and quality management auditor. Where this supplier audit is completed by a second or third party, the company 		

	<p>shall be able to:</p> <ul style="list-style-type: none"> • demonstrate the competency of the auditor • confirm that the scope of the audit includes product safety, traceability, HARA review and good manufacturing practices • obtain and review a copy of the full audit report. <p>By exception, and only where a valid risk-based justification is provided, initial and ongoing approval may be based on:</p> <ul style="list-style-type: none"> • a historical trading relationship supported by documented evidence of performance reviews demonstrating satisfactory performance • a manufacturing site questionnaire which has been reviewed and verified by a demonstrably competent person • a specific customer requirement to supply product from a manufacturer where liability is with the customer. 		
7.1.3	<p>Records shall be maintained of the manufacturer's or packer's approval process, including audit reports or verified certificates confirming the product safety status of the manufacturing/packing sites supplying the products traded. There shall be a process of review, and records of follow-up of any issues identified at the manufacturing/packing sites with the potential to affect packaging products traded by the company.</p>		
7.1.4	<p>There shall be a documented process for the ongoing review of manufacturers or packers, based on risk and using defined performance criteria, which shall include:</p> <ul style="list-style-type: none"> • complaints • results of any product tests • regulatory warnings/alerts • customer rejections or feedback. <p>The process shall be fully implemented.</p>		

7.2 Specifications			
	Specifications or information to meet legal requirements and assist customers in the safe usage of the product shall be maintained and available to customers.		
Clause	Requirements	Conforms	Comments
7.2.1	Specifications shall be available for all products. These shall either be in the agreed format as supplied by the customer or, where this is not specified, include key data to meet legal requirements and assist the customer in the safe usage of the product. Specifications may be in the form of a printed or electronic document, or part of an online specification system.		
7.2.2	The company shall seek formal agreement of the specifications with relevant parties. Where specifications are not formally agreed, the company shall be able to demonstrate that it has taken steps to put an agreement in place.		
7.2.3	Companies shall operate demonstrable processes to ensure that any customer-specified requirements are met. This may be by inclusion of customer requirements within buying specifications or by undertaking further work on the purchased product to meet the customer's specification (e.g. sorting or grading of product).		
7.2.4	Specifications shall be reviewed whenever products/packaging or suppliers change or at least every 3 years. The date of review and the approval of any changes shall be recorded.		
7.3 Product inspection and laboratory testing			
	The site shall operate processes to ensure that the products received comply with buying specifications and that the supplied product is in accordance with any customer specification.		
Clause	Requirements	Conforms	Comments
7.3.1	The site shall use risk assessment where product sampling or testing is required to verify that the products are in accordance		

	<p>with buying specifications and meet legal and safety requirements.</p> <p>Where verification is based on sampling, the sample rate and assessment process shall be risk-based.</p> <p>Records of the results of assessments or analysis shall be maintained.</p>		
7.3.2	Where verification of conformity is provided by the supplier (e.g. certificates of conformity or analysis), the company shall use risk assessment to determine whether periodic independent product analysis may be required to ensure confidence in the information provided.		
7.3.3	Where claims are made about the products being handled, including the provenance, chain of custody or assured status of a product, supporting information shall be available from the supplier or independently to verify the claim.		
7.3.4	Where the company undertakes or subcontracts analyses which are critical to product safety or legality, the laboratory or subcontractors shall have gained recognised laboratory accreditation or operate in accordance with the requirements and principles of ISO 17025. Documented justification shall be available where non-accredited test methods are used.		
7.3.5	Test and inspection results shall be retained and reviewed to identify trends. Appropriate actions shall be implemented promptly to address any unsatisfactory results or trends.		
7.4 Product legality			
	The company shall have processes in place to ensure that the products traded comply with the legal requirements in the country of sale where known.		
Clause	Requirements	Conforms	Comments
7.4.1	<p>The company shall have documented processes to verify the legality of products which are traded. These shall include, as applicable:</p> <ul style="list-style-type: none"> labelling information 		

	<ul style="list-style-type: none"> • compliance with relevant legal compositional requirements • compliance with quantity or volume requirements. <p>Where such responsibilities are undertaken by the customer, this shall be clearly stated in contracts.</p>		
7.5 Traceability			
	The company shall be able to trace all product lots back to the last manufacturer and forward to the customer of the company.		
Clause	Requirements	Conforms	Comments
7.5.1	The site shall maintain a traceability system for all batches of product which identify the last manufacturer or packer of the product. Records shall also be maintained to identify the recipient of each batch of product from the company.		
7.5.2	The company shall test the traceability system at least annually to ensure that traceability can be determined back to the last manufacturer and forward to the recipient of the product from the company. This shall include identification of the movement of the product through the chain from the manufacturer to receipt by the company (e.g. each movement and intermediate place of storage).		
7.5.3	The traceability test shall include the reconciliation of quantities of product received by the company for the chosen batch or product lot.		