

# Audit Report

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

<b>Company Name:</b>	Flexoplast B.V.	<b>Site name:</b>	Flexoplast B.V.
<b>Audit Category:</b>	High Hygiene Risk	<b>BRC Site Code:</b>	1692398

<b>Audit Result:</b>	CERTIFICATED	<b>Audit Grade:</b>	A
		<b>Audit Frequency :</b>	12 months

A or B = 12 months  
C = 6 months

<b>Audit Start Date:</b>	2012-01-10	<b>Audit Finish Date:</b>	2012-01-10
<b>Re-audit Due Date:</b>	2013-01-18	<b>Previous Audit Date:</b>	2011-01-13

<b>Auditor Number (one only : team leader)</b>	<b>Auditor Names</b>
053042	R.A.M van Waes T.Vrij

### Scope Details

<b>Packaging Field:</b>	04 - Plastics
	Select a packaging field
	Select a packaging field
	Select a packaging field
<b>Scope of Audit:</b>	English: Manufacturing (slitting, printing, laminating and sealing) off poly-ethylene and poly-propylene flexible packaging Dutch: Het produceren (snijden, bedrukken, lamineren. sealen) van poly-ethyleen en poly-propylene flexibele verpakkingen
<b>Exclusions from Scope:</b>	None
<b>Non-applicable clauses:</b>	2.2.8 – 2.2.9 – 2.2.10 – 3.5 – 4.1.6 – 4.1.7 – 4.2.2 - 5.2.6
<b>Products in production at the time of the audit:</b>	Flexible packaging for Potato King FP 4500458525 – 50 PRI 00546000007

### Company Profile

*The company Flexoplast B.V. is a production plant for printing and converting flexible packaging within the Clondalkin Group (international converter of flexible PE/PP films, laminated packaging) in Harlingen the Netherlands. There is a sister company "Flexoplast" location in Wieringerwerf the Netherlands as well who do the extrusion part of the production of packaging and after that they deliver the material films to the company in Harlingen.*

*Flexoplast B.V. produces flexible packaging for (direct/indirect contact) for the food industry and also for non-food purposes.*

*Equipment in use:*

*1 laminating machine*

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*5 Flexo printing presses  
14 Confection seal machines*

*Turnover Flexoplast in kg. = 18.000T  
Turnover Flexoplast in € = 45milj*

*The company has about 110 employees working in 2 or 3 shifts in Harlingen, only the staff in the ink department is working in day time.*

*Age of site already 50 years but modern redeveloped, size 14.000 m<sup>2</sup>.*

*The site is also registered for ISO 9001.*

*No product changes since last audit. During 2011 a new 8-color printing machine is installed.*

*There are seven product categories were products can be used for:*

- Frozen*
- Bundle*
- Bakery*
- Agriculture*
- Hygiene*
- Pet Food*
- Insulation*

*In the company 1 overall HACCP study is in place.*

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## Detail of Non Conformities

### Summary of Non-Conformity Raised

	No.		No.
Critical non-conformity		Major non-conformity	
Major against statement of intent of a Fundamental clause		Minor non-conformity	6

### Critical

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

### Major against SOI of a Fundamental Clause

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

### Major

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Date signed off	Reviewed by

### Minor

No.	Requirement ref.	Detail of Non-Conformity	Corrective action taken (with consideration of root cause)	Evidence provided Document Photograph Visit/Other	Dated signed off	Reviewed by
1	1.3.4	At the moment of the audit there wasn't an appropriate documented arrangement in place to cover for the absence of key staff.	An appropriate documented arrangement to cover for the absence of key functions was not in place because of the growing and changing functions in Flexoplast. In the MT meeting of 26-01-2012 is decided to prepare such a document. The concept document is prepared and shall be	Annex 1: concept document covering key functions 02-02-2012	03-02-2012	RVW.

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			confirmed in the next MT meeting			
2	2.2.11	<p>Procedure of verification is still not established to confirm that the HACCP plan is effective in the form of internal audits (at an interval of 12 months), review of / CP records on a daily basis, review of customer feedbacks including complaints, GMP audits.</p> <p>Where a significant issue occurs the team is reconvened to consider the hazard and risk management plan.</p>	<p>Verification of the HACCP plan will be covered by the planning of internal audits in 2012. Management review and the results of internal audits will be picked up after the MR of 26-01-2012. CP-records and customer feedbacks will be picked up after the MR 26-01-2012.</p>	<p>Annex 2: agenda MR 26-01-2012 Annex 3: Notes MR-26-01-2012 Annex 3: planning internal audits 2012</p>	03-02-2012	RVW.
3	3.4.3	<p>Purchases sought from 3 non-approved suppliers are not clear. 3 Suppliers hasn't an accepted status. The required responsibility to be approved by the purchasing manager is not clear.</p>	<p>Almost 99% of supplier's information is available. No qualification to the status how suppliers' level is in reality. System of suppliers qualification updated (see Annex 4)</p>	Annex 4: suppliers information	03-02-2012	RVW.
4	4.3.2	<p>There is no evidence available of pressured air. The monitoring to effectively control the risk of product contamination is not available.</p>	<p>Pressured air is used for printing process. Program for maintenance is available. There is no risk for contamination because of when pressured air is out of work there is no printing process possible.</p>	<p>Annex 5: contract maintenance pressured air. Pressured air is part of the HACCP risk analysis and no risk of contamination is possible</p>	03-02-2012	RVW.
5	4.8.4.	<p>Gender specific locker and changing rooms provided with appropriate lockers for segregation of personal clothing and work wear, including toilets are available. A few lockers were open and inside dirty with potential risk for contamination.</p>	<p>Lockers should be closed always. This is the responsibility of the employees. Dirty working clothes in the same lockers as the privately clothes is forbidden. A special internal instruction is distributed in the company</p>	Annex 6: Internal instruction lockers and clothing	03-02-2012	RVW.

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6	5.3.5	Not available is the migration document of TPL NT-03 Mydibel 15003.012.760014 X021774-760-015 ANT 10783ei	Migration tests are available from most products. Mydibel test was not available because of this new customer. Test is now available	Annex 7: Migration tests Mydibel	03-02-2012	RVW.
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## Company Details

<b>Company Name</b> : Flexoplast B.V.	
<b>Site Name</b> : Flexoplast B.V.	
<b>Address</b> : Industrieweg 1, Harlingen	
<b>Country</b> : The Netherlands	<b>Country</b> : The Netherlands
<b>Telephone</b> : +31(0)517-432611	<b>Telephone</b> : +31(0)517-432611
<b>Company Representative Name</b> : Mr. W.de Lange( Quality Manager )	
<b>Email</b> : <a href="mailto:w.de.lange@flexoplast.nl">w.de.lange@flexoplast.nl</a>	

## Key Personnel

Name/Job Title	Present at Audit (x)			
	Opening Meeting	Site Inspection	Procedure Review	Closing Meeting
Note: the most senior operations manager on site should be listed first and be present at both opening & closing meetings				
<b>Name</b> J.v/d. Meer Managing director	<b>x</b>			<b>x</b>
<b>Name</b> M.Boon Operations manager		<b>x</b>	<b>x</b>	
<b>Name</b> W.de Lange QSHE Manager	x	<b>x</b>	<b>x</b>	x
<b>Name</b> Sjors Bijlsma Quality controller assistent	<b>x</b>	<b>x</b>	<b>x</b>	<b>x</b>
<b>Name</b> K. Struiksma Head of TD ( maintenance)		<b>x</b>		
<b>Name</b> W. Roorda Manager R&D/Technical manager		<b>x</b>		
<b>Name</b> S. Rouji Operator " inkt kitchen"		<b>x</b>		
<b>Name</b> P. v/d Ploeg Operator "Lamineer afdeling"		<b>x</b>		
<b>Name</b> E. Visser Operator Stella 8 drukpers		<b>x</b>		
<b>Name</b> J.Kuiken Operator "Snijmachine Kampf 271)		<b>x</b>		
<b>Name</b> E. de Vries Driver external transport company "J.Pronk"		<b>x</b>		
<b>Name</b> L. v/d Veen Expedition/ internal storage		<b>x</b>		
<b>Name</b> M. Oegema Operator		<b>x</b>		
<b>Name</b> S.Dijkstra Operator		<b>x</b>		
<b>Name</b> J.Rutten Operator		<b>x</b>		
<b>Name</b> J.Bootsma Lab operator		<b>x</b>		
<b>Name</b> C.van Dessel Manager Rescources		<b>x</b>		
<b>Name</b> K. Boksmas Head of purchase		<b>x</b>		
<b>Name</b> P.Hoogendam Sales Manager		<b>x</b>		

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<b>Name</b> J.van Houten Sales binnendienst		<b>X</b>		
<b>Name</b> K.Kooistra Grafische afdeling		<b>X</b>		
<b>Name</b> K.Nieveen Planning/ordervoorbereiding		<b>X</b>		

### Audit Duration Details

On-site audit duration 16 Man Hours
Duration of production facility audit 3 Man Hours
Reasons for deviation from typical (12 hours) or expected on-site audit duration or typical (3 hours) site inspection duration. Audit performed by two auditors

### Audit Duration per day

	Start time	Finish time
<b>Day 1</b>	0900	1800

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## Detailed Audit Report

BRC Requirement No.	REQUIREMENT	Conforms	Details
		Y, N or N/A	
<b>1 SENIOR MANAGEMENT COMMITMENT AND CONTINUAL IMPROVEMENT</b>			

### 1.1 Product Safety and Quality Management System

Statement of Intent	<p>Het top management van het bedrijf zal een productveiligheid- en kwaliteitsbeleid ontwikkelen en vastleggen dat geautoriseerd, ondertekend, geëvalueerd en gedatederd is door een geschikte senior manager.</p> <p><i>The company's senior management shall develop and document a product safety and quality management policy, which is authorised, reviewed, signed and dated by an appropriate senior manager.</i></p>	Y	<p>There is a documented food safety policy which is signed by the Senior Plant Director, Jeroen van der Meer PO1A 03-01-2012 and is displayed both at the site entrance, and included within the staff hand book.</p>
	1.1.1		1.1.2

### 1.2 Senior Management Commitment

### FUNDAMENTAL

Statement of Intent	<p>Het top management van het bedrijf moet aantonen dat zij volledig betrokken is bij de implementatie van de vereisten van Global Standard for Packaging en Packing Materials. Dit betekent het beschikbaar stellen van adequate middelen, effectieve communicatie en een management review die leidt tot voortdurende verbeteringen. Verbeterkansen moeten worden vastgesteld, geïmplementeerd en volledig gedocumenteerd worden.</p> <p><i>The company's senior management shall demonstrate that they are fully committed to the implementation of requirements of the Global Standard for Packaging and Packaging Materials. This shall include provision of adequate resources, effective communication and systems of management review to effect continual improvement. Opportunities for improvement shall be identified, implemented and fully documented.</i></p>	Y	<p>Organization has developed a QMS in accordance with ISO 9001:2008 standard and Global Standard for Food Safety. The visit shows that an effective system is maintained and compliant with the process controls and it is effective in meeting customer, process and product measures. Systems for continual improvement and PDCA cycle can be clearly demonstrated.</p> <p>This was demonstrated by interview with senior management team led by J. van der Meer Senior Plant Director</p> <p>The management team has an overall responsibility for the Quality Management System and reports on issues to the senior management team meetings each month.</p>
1.2.1	<p>Het top management van het bedrijf dient er zorg voor te dragen dat meetbare productveiligheid- en kwaliteitsdoelstellingen zijn gedefinieerd, gedocumenteerd, beoordeeld en geëvalueerd.</p> <p><i>The company's senior management shall ensure that product safety and quality objectives are measurable, established, documented, monitored and reviewed.</i></p>	Y	<p>Annual management review meetings progress reviewed at 12 monthly review sessions. Records from review of 2011 checked. ( report P01F January 2012 )</p> <p>Outputs from annual management review include targets for complaints, waste, down time, product quality. Results published on staff notice board.</p> <p>Goals for 2011/2012</p> <ul style="list-style-type: none"> <li>To safe the new the BRC IoP certificate issue 4</li> <li>Registrations of complains conform the PDCA</li> <li>Finishing of the new production line for film</li> <li>Review the planning of the internal audits</li> <li>Safety</li> <li>Leadership</li> <li>Visual Management</li> </ul>
1.2.2	<p>Het top management van het bedrijf moet de personele en financiële middelen verschaffen om de processen van het kwaliteit managementsysteem en het product veiligheids programma te implementeren.</p> <p><i>The company's senior management shall provide the human and financial resources required to implement the processes of the quality management system and product safety programme.</i></p>	Y	<p>Meeting with Top Management demonstrated that adequate resource required for the effective operation are provided.</p> <ul style="list-style-type: none"> <li>- Quality Policy;</li> <li>- Year 2011/2012 goals;</li> <li>- Management review ( report P01F January 2012 )</li> </ul>

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1.2.3	<b>Er moeten duidelijke communicatie- en rapportagekanalen aanwezig zijn voor de bewaking van het naleven van standaard.</b> <i>Clear communication and reporting channels shall be in place to report on and monitor compliance with the Standard.</i>	<b>Y</b>	Daily shift handover meetings take place including reports on internal audits Monthly management records for 2011 reviewed and satisfactory.
1.2.4	<b>Het top management dient een systeem te hebben geïmplementeerd waardoor het bedrijf geïnformeerd wordt over voedselveiligheids-issues, wetgeving, wetenschappelijke en technische ontwikkelingen, en Codes of Practices die van toepassing zijn in de landen waar het product verkocht en/of gebruikt zal worden.</b> <i>The company's senior management shall have a system in place to ensure that the company is kept informed of all relevant legislative requirements in the country of manufacture and, where known, the country in which the packaging material will be sold. The company shall also be aware of any scientific and technical developments and industry codes of practice applicable.</i>	<b>Y</b>	Company's senior management gets legal and regulatory updated through different channels: <ul style="list-style-type: none"> <li>• Website nVWA</li> <li>• Website branches</li> <li>• Magazines</li> <li>• Industry news via daily email newsletters</li> <li>• Internet sites</li> <li>• Training</li> <li>• Extern consultant if necessary</li> </ul>
1.2.5	<b>Het bedrijf dient zeker te stellen dat alle producten geproduceerd worden volgens de relevante wetgeving (inclusief alle wetgeving aangaande het gebruik van gerecycled materiaal) van de landen waar het product verkocht en/of gebruikt wordt.</b> <i>The company shall ensure that the materials manufactured comply with the relevant legislation (including any legislation concerning the use of recycled content) in the country of manufacture and in which the products are intended to be sold and/or ultimately used, where known.</i>	<b>Y</b>	Products manufactured in, and sold to different countries. Compliance with legislation demonstrated by DoC (declaration of compliance) contents
1.2.6	<b>Het top management van het bedrijf moet er voor zorgen dat afwijkingen die bij de voorgaande audit tegen de Standaard vastgesteld werden effectief zijn afgehandeld.</b> <i>The company's senior management shall ensure that non-conformities identified at the previous audit against the Standard are effectively actioned.</i>	<b>Y</b>	7 non-conformities from the previous audit were closed out and have not recurred at this audit
1.2.7	<b>Het bedrijf moet de actuele versie van de Global Standard for Packaging ter beschikking hebben.</b> <i>The company shall have a current, original copy of the Standard available on site.</i>	<b>Y</b>	The Global Standard for Packaging Issue 4, February is available in hard copy
1.2.8	<b>Het gecertificeerde bedrijf dient er voor te zorgen dat de hercertificatie zal plaatsvinden op- of voor de hercertificatie datum die vermeld is op het certificaat.</b> <i>Where the company is certificated to the Standard they shall ensure that recertification audits occur on or before the audit due dated indicated on the certificate.</i>	<b>Y</b>	Re-evaluation due dated scheduled for the present audit was respected.

### 1.3 Organisational structure, responsibilities and management authority

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Statement of Intent	<p><b>De organisatie dient een duidelijke organisatie structuur op te zetten waarbij verantwoordelijkheden, relaties tussen rapportages en functiebeschrijvingen zijn vastgelegd voor medewerkers die werkzaamheden uitvoeren m.b.t. product veiligheid, wet- en regelgeving en kwaliteit.</b>  <i>The company shall have a clear organisational structure and define the responsibilities, reporting relationships and job functions of those personnel whose activities affect product safety, legality, regulatory compliance and quality.</i></p>			<b>N</b>	<p>The management structure is documented within the quality manual, with designated deputies. The senior management team is comprised of the Production Manager, Sales/Marketing Manager, Manager finance, Manager HRM and the Technical Manager. All Managers are reporting to the Senior Plant Director. There are 6 shift managers for each shift and 2QA supervisors.</p> <p>Job descriptions are available for all managers and supervisors and a responsibility matrix has been documented. The job description for the QA supervisor is reviewed and found to be satisfactory. Work instructions form part of the Quality Manual. Reviewed PO2F-RF-01 production</p> <p>At the moment of the audit there wasn't an appropriate documented arrangement in place to cover for the absence of key staff.</p> <p>Minor</p>
	1.3.1	Y	1.3.2		Y
	1.3.3	Y	1.3.4		N
	1.3.5	Y			
<p><b>1.3.4 At the moment of the audit there wasn't an appropriate documented arrangement in place to cover for the absence of key staff.</b></p>					

### 1.4 Management Review

Statement of Intent	<p><b>Het topmanagement van het bedrijf zal de management review uitvoeren om zeker te stellen dat het product veiligheids- en kwaliteitsprogramma effectief en volledig geïmplementeerd is en mogelijkheden voor verbetering zijn vastgesteld.</b>  <i>The company's senior management shall ensure that a management review is undertaken to ensure that the product safety and quality programme is fully implemented, effective and that opportunities for improvement are identified</i></p>			<b>Y</b>	<p>The management review is chaired by senior Plant Director, J. van der Meer          There is an annual review with 12-monthly progress review sessions with senior management.          Minutes of the meeting and action plan from 2011 reviewed and included all the required items.          The 12-monthly review meetings are used to review progress. Minutes include timescales and confirmation of completion, progress toward agreed targets, e.g. customer complaints, which are then briefed to team leaders where required.</p>
	1.4.1	Y	1.4.2		Y
	1.4.3	Y	1.4.4		Y
	1.4.5	Y			

## 2 HAZARD AND RISK MANAGEMENT SYSTEM

### 2.1 Hazard and risk management team

Statement of Intent	<p><b>Het HACCP-plan moet ontwikkeld en beheerd worden door een multidisciplinair voedselveiligheids team en dient te zorgen dat dit volledig wordt toegepast.</b>  <i>A multidisciplinary hazard and risk management team shall be in place to develop and manage the hazard and risk analysis system and ensure this is fully implemented.</i></p>			<b>Y</b>	<p>Hazard and risk management team made up of 5 people representing J. van der Meer (Senior Management), M.Boon (Production manager) W de Lange (QA manager) and Technical Managers W Roorda and A Kramer. Team led by Quality Assurance Manager W de Lange, since 2011 and has formal training hazard and risk management training Last training 31-10-2011. The system is well laid out, demonstrating competence. The members of the senior management team are able to keep the team up to date with factory changes and customer requirements.</p>
	2.1.1	Y	2.1.2		Y
	2.1.3	Y			

### 2.2 Hazard and Risk Analysis

#### FUNDAMENTAL

Statement of Intent	<p><b>Een formeel gevaren- en risico management systeem dient aanwezig te zijn om zeker te stellen dat alle gevaren voor de veiligheid van producten en integriteit volledig zijn geïdentificeerd en er passende beheersing is ontwikkeld.</b>  <i>A formal hazard and risk managements system shall be in place to ensure that all hazards to product safety and integrity are identified and appropriate controls established.</i></p>			<b>Y</b>	<p>A formal hazard and risk managements system is in place to ensure that all hazards to product safety and integrity are identified and appropriate controls established.</p> <p>Procedure P04A 28-12-2011</p>

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2.2.1	<p><b>De scope van de gevaren en risico-analyse moeten duidelijk zijn gedefinieerd en heeft betrekking op alle producten en processen die binnen de scope vallen van de certificering.</b>  <i>The scope of the hazard and risk analysis shall be clearly defined and shall cover all products and processes included within the intended scope of certification.</i></p>	<b>Y</b>	<p>The scope of the hazard and risk management is based on clearly defined and manufacture of plastic films. Modules are used for manufacturing characteristics are generic</p>
2.2.2	<p><b>Het HACCP team is bekend en dient rekening te houden met:</b></p> <ul style="list-style-type: none"> <li>• <b>historische en bekende gevaren van specifieke processen, grondstoffen of het eind gebruik van het product</b></li> <li>• <b>relevante gedragscodes of erkende richtlijnen</b></li> <li>• <b>wettelijke eisen</b></li> </ul> <p><i>The hazard and risk analysis team shall maintain awareness of and take into account:</i></p> <ul style="list-style-type: none"> <li>• <i>historical and known hazards associated with specific processes, raw materials or end use of the product</i></li> <li>• <i>relevant codes of practice or recognised guidelines</i></li> <li>• <i>Legislative requirements.</i></li> </ul>	<b>Y</b>	<p>The QA Manager maintains a technical file and uses industry newsletters, Website nVWA, internet sites, training and as information sources. He also subscribes to various alert systems including the recall alert system</p>
2.2.3	<p><b>Een volledige beschrijving van het product moet worden ontwikkeld waarin alle relevante informatie over productveiligheid en integriteit zijn vastgelegd. Als leidraad kan dit zijn:</b></p> <ul style="list-style-type: none"> <li>• <b>Samenstelling van bijv. grondstoffen, inkten, vernissen, coatings en andere print chemicaliën.</b></li> <li>• <b>herkomst van de grondstoffen inclusief het gebruik van gerecyclede materialen</b></li> <li>• <b>Het beoogde gebruik van de verpakkingsmaterialen en vastgelegde beperkingen bij het gebruik, bijvoorbeeld direct contact met levensmiddelen, fysische of chemische omstandigheden.</b></li> </ul> <p><i>A full description of the product shall be developed, which includes all relevant information on product safety and integrity. As a guide this may include:</i></p> <ul style="list-style-type: none"> <li>• <i>composition, e.g. raw materials, inks, varnishes, coatings and other print chemicals</i></li> <li>• <i>origin of raw materials including use of recycled materials</i></li> <li>• <i>intended use of the packaging materials and defined restrictions on use; for instance, direct food contact, physical or chemical conditions.</i></li> </ul>	<b>Y</b>	<p>Product descriptions were adequate and included all required items.</p> <p>Examples raw materials:          Foil          FP 4500458525          Ink          90 LSH-12/FJ 32          Harder          00LRJ-11/DMO1          Lacquer          10LSI-32/FJ32          Glue          UR 7780          Harder          UR6080          Finished product          005582 3072 G</p> <p>No recycled content (aside from in-house regrind) as materials are direct food contact.</p>

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2.2.4	<p>Van elk product, productieproces en productgroep moet een flow diagram zijn opgesteld. Deze omvat elke processtap vanaf de ontvangst van de grondstoffen tot verzending naar de klant. De processtroom dient als een gids, voor onder meer de volgende toepassingen (indien relevant):</p> <ul style="list-style-type: none"> <li>• ontvangst en goedkeuring van ontwerpen</li> <li>• ontvangst en de voorbereiding van grondstoffen zoals additieven, inkt en kleefstoffen</li> <li>• elke productieproces stap</li> <li>• het toepassen van rework en mogelijk te gebruiken gerecycled materiaal</li> <li>• uitbesteden van werk bij onderaannemers</li> <li>• retourneren van de klant</li> </ul> <p>Het HACCP team dient de nauwkeurigheid van de processtromen te controleren.</p> <p><i>A process flow diagram shall be prepared for each product, product group or process. This shall include each process step from the receipt of raw materials to despatch to the customer.</i></p> <p><i>The process flow shall as a guide include, as relevant:</i></p> <ul style="list-style-type: none"> <li>• receipt and approval of art work</li> <li>• receipt and preparation of raw materials such as additives, inks and adhesives</li> <li>• each manufacturing process step</li> <li>• the use of rework and post-consumer recycled materials</li> <li>• any sub-contracted operations</li> <li>• customer returns.</li> </ul> <p><i>The accuracy of the process flow shall be verified by the hazard and risk analysis team.</i></p>	Y	<ul style="list-style-type: none"> <li>• Process steps: (manufacture of printed foil) receipt of raw materials, inspection, storage, melting, forming, inspection, approval, packing, storage, dispatch (where relevant) Tray forming: inspection, heating, thermoform, inspection, approval, packing, storage.</li> <li>• Aanleverend transport</li> <li>• Inkoop/verkoop</li> <li>• Ontvangst en opslag</li> <li>• Drukken</li> <li>• Sealen</li> <li>• Lamineren</li> <li>• Drogen</li> <li>• Snijden</li> <li>• Verpakken</li> <li>• Opslag</li> <li>• Expeditie</li> <li>• Afleverend transport</li> </ul> <p>Generic processes were covered on separate flow diagrams, which were comprehensive. Verification of the flow diagram carried out by the hazard and risk management team, dated 28-12-2011 and re-checked on occurrence of any factory or process changes</p>
2.2.5	<p>Het HACCP team identificeert en registreert alle mogelijke gevaren die redelijkerwijze te verwachten zijn bij elke stap in relatie tot het product en het proces. De volgende risico's worden beschouwd, indien van toepassing:</p> <ul style="list-style-type: none"> <li>• microbiologie</li> <li>• vreemde voorwerpen</li> <li>• chemische verontreiniging (bijvoorbeeld kleur-, geurstoffen, allergenen, migrerende stoffen vanuit inkten, lak en lijm)</li> <li>• potentiële problemen die voortvloeien uit het gebruik van gerecycleerde materialen</li> <li>• rechtmatigheid</li> <li>• gebreken die van cruciaal belang zijn voor de veiligheid van consumenten</li> <li>• gevaren die een impact hebben op de functionele integriteit en prestaties van het uiteindelijke product tijdens het gebruik.</li> </ul> <p><i>The hazard and risk analysis team shall identify and record all potential hazards that are reasonably expected to occur at each step in relation to the product and process. The hazards considered shall include, where relevant:</i></p> <ul style="list-style-type: none"> <li>• microbiological</li> <li>• foreign objects</li> <li>• chemical contamination (e.g. taint, odour, allergen, component transfer from inks, varnishes and glues)</li> <li>• potential problems arising from the use of recycled materials</li> <li>• legality</li> <li>• defects critical to consumer safety</li> <li>• hazards that may have an impact on the functional integrity and performance of the final product in use.</li> </ul>	Y	<p>The hazard and risk management plan included a review of potential hazards – chemical, physical, microbiological, allergens and defects. Physical hazards include foreign body contamination and out-of specification product (defects). Microbiological hazards removed by pre-requisite controls. Potential sources of allergens such as latex (e.g. gloves) are not permitted on site. Defects are managed by the pre-requisite program. These were listed by process step.</p>

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2.2.6	<p><b>Het HACCP team identificeert de noodzakelijke controle maatregelen om elk gevaar te voorkomen, te elimineren of te verminderen tot een aanvaardbaar niveau. Waar een controle is d.m.v. een PRP dienen deze te worden beoordeeld om te zorgen dat de geïdentificeerde risico's worden beheerst en waar nodig verbeteringen zijn doorgevoerd.</b></p> <p><i>The hazard and risk analysis team shall identify control measures necessary to prevent, eliminate or reduce each hazard to acceptable levels. Where control is through a prerequisite programme these shall be reviewed to ensure they adequately control the risk identified and where necessary improvements implemented.</i></p>	Y	<p>The risk is assessed on the basis of a risk ranking table Risk = Possibility X Seriousness. On the basis of the outcome, the risk that may result in the risk factor is equal to an integer</p>
2.2.7	<p><b>Voor elk gevaar dat controle, anders dan door een bestaande voorwaarde programma, vereist, dienen de controlepunten worden beoordeeld van degenen die als kritisch zijn geïdentificeerd. Dit proces omvat een beoordeling van het risico-niveau voor elk gevaar op basis van de waarschijnlijkheid van het optreden en de ernst van het resultaat. Kritische controlepunten zijn die controlepunten die nodig zijn om het risico (van veiligheid of integriteit van het product) te voorkomen, te elimineren of te verminderen tot een aanvaardbaar niveau. Waar de controles niet worden geclassificeerd als kritisch en controle wordt bereikt door een PRP, moet een programma zijn ontwikkeld dat voldoende is gespecificeerd om effectieve controles van de vastgestelde gevaren uit te voeren.</b></p> <p><i>For each hazard that requires control, other than by an existing prerequisite program, the control points shall be reviewed to identify those that are critical. This process shall include an assessment of the risk level for each hazard based on the likelihood of the occurrence and the severity of the outcome. Critical control points shall be those control points that are required to prevent, eliminate or reduce a product safety or integrity hazard to acceptable levels. Where controls are not classified as critical and control may be achieved through a prerequisite programme, a programme shall be developed that is sufficiently specified to effectively control the identified hazards.</i></p>	Y	<p>Suitable controls for each hazard were documented; in many cases these formed part of the prerequisite program. Hazards linked to the use of master batch (quality hazard) are covered by supplier approval and purchasing requirements in contracts. Foreign body contamination hazards are covered by pre-requisite programmes: personnel disciplines, cleaning, equipment condition, and maintenance and pest control.</p>
2.2.8	<p><b>Voor elke CCP, moeten geschikte kritisch grenswaarden worden gedefinieerd teneinde duidelijk te kunnen vaststellen of het proces al dan niet onder controle is. Waar mogelijk moeten de kritische grenswaarden meetbaar zijn en de onderbouwing van de vaststelling ervan moet duidelijk gedocumenteerd zijn. Er moet rekening worden gehouden met relevante wetgeving of praktijkgidsen bij het vaststellen van grenswaarden.</b></p> <p><i>For each critical control point, the appropriate critical limits shall be defined in order to identify clearly if the process is in or out of control. Critical limits shall be measurable where possible and the rationale for their establishment clearly documented. Relevant legislation and codes of practice shall be taken into account when establishing the limits.</i></p>	N/A	<p>Used of a HACCP decision tree in which the potential risks by the HACCP decision tree led to judge whether we are dealing with a CCP or CP. The study identified no critical control points. Ref. HACCP study PO4A 28-12-2011</p>

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2.2.9	<p>Voor elke CCP, moeten geschikte kritisch grenswaarden worden gedefinieerd teneinde duidelijk te kunnen vaststellen of het proces al dan niet onder controle is. Gegevens van de monitoring worden onderhouden. Procedures met betrekking tot de bewaking van kritische controles moeten zijn opgenomen in interne audits tegen de standaard (zie artikel 3.4).</p> <p><i>For each critical control point a monitoring system shall be defined in order to ensure compliance with critical limits. Records of the monitoring shall be maintained. Procedures relating to the monitoring of critical controls shall be included in internal audits against the Standard (refer to clause 3.3).</i></p>	N/A	No critical control points identified.
2.2.10	<p>De corrigerende maatregelen die moeten worden genomen wanneer bij controle wordt vastgesteld dat er niet wordt voldaan aan de limieten moeten zijn gedocumenteerd. Dit omvat de blokkade (quarantaine) procedure en een evaluatie van producten die buiten de specificaties vallen. Dit om te waarborgen dat ze niet worden vrijgegeven tenzij bevestigd is dat ze geschikt zijn voor vrijgave.</p> <p><i>The corrective action that shall be taken when monitored results indicate a failure to meet the control limit shall be established and documented. This shall include the procedures for quarantining and evaluating potentially out of specification products to ensure they are not released until their safety can be established.</i></p>	N/A	No critical control points identified.
2.2.11	<p>De gevarenanalyse dient minimaal 1 x per jaar te worden beoordeeld of als een proces verandert of bij een relevant incident. De beoordeling omvat een verificatie dat de gevaren-en risico-analyse op doeltreffendheid, de volgende zaken dienen beoordeeld te worden:</p> <ul style="list-style-type: none"> <li>• klachten</li> <li>• product fouten</li> <li>• recalls</li> <li>• terughalen van product</li> <li>• resultaten van interne audits en Basis Voorwaarden Programma</li> <li>• resultaten van externe third party audits.</li> </ul> <p><i>A review of the hazard and risk management system shall be carried out at least once per year and following any significant incidents or when any process changes.</i></p> <p><i>The review shall include a verification that the hazard and risk analysis plan is effective and may include a review of:</i></p> <ul style="list-style-type: none"> <li>• complaints</li> <li>• product failures</li> <li>• recalls</li> <li>• product withdrawals</li> <li>• results of internal audits of prerequisite programmes</li> <li>• results from external third-party auditors.</li> </ul>	N	<p>Procedure of verification is still not established to confirm that the HACCP plan is effective in the form of internal audits (at an interval of 12 months), review of / CP records on a daily basis, review of customer feedbacks including complaints, GMP audits.</p> <p>Where a significant issue occurs the team is reconvened to consider the hazard and risk management plan.</p> <p>Minor</p>

### 2.3 Exemption of requirements based on risk analysis

Statement of Intent	<p>Aangetoond is dat de vestiging voldoet aan de eisen van dit hoofdstuk.</p> <p>The site has demonstrated adequate compliance with the requirements of this clause.</p>	Y	No exemptions on the basis of risk were identified.	
	2.3.1	Y	2.3.2	Y

## 3 PRODUCT SAFETY AND QUALITY MANAGEMENT SYSTEM

### 3.1 Product safety and quality manual

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Statement of Intent	<p><b>Het bedrijf moet een kwaliteitshandboek hebben dat beschrijft hoe aan de standaard wordt voldaan. Deze eisen moeten volledig geïmplementeerd zijn, met geschikte geplande tussenpozen herbeoordeeld en waar van toepassing verbeterd worden.</b></p> <p>The company shall have a manual which describes how the requirements of the Standard are met. These requirements shall be fully implemented, reviewed at appropriate planned intervals and improved where necessary.</p>	Y	<p>The company has a series of manuals which address different parts of the safety and quality system, including a hazard and risk management manual, quality manual, operating procedures and a training manual. The system is indexed. ref. QA manual issue 28-12-2011</p>	
	3.1.1	Y	3.1.2	Y

### 3.2 Customer focus and contract review

Statement of Intent	<p><b>Het top management van het bedrijf moet er voor zorgen dat er processen in werking zijn om de behoeften van de klant en verwachtingen met betrekking tot productveiligheid en kwaliteit vast te stellen, en er voor zorgen dat ze gerealiseerd worden.</b></p> <p>The company's senior management shall ensure that processes are in place to determine customer needs and expectations with regard to quality and safety and ensure these are fulfilled.</p>	Y	<p>The company has a QA / Account manager who liaise directly with customers and the site Production Manager and customer service administrators. Yearly reviews take place with key customers with annual reviews of all other customer types. See overall review 2011</p>	
	3.2.1	Y	3.2.2	Y
	3.2.3	Y		

### 3.3 Internal audits

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Statement of Intent	<p><b>Het bedrijf dient audits uit te voeren op die systemen en procedures die in worden vereist in de standaard. En dient te zorgen dat ze aanwezig zijn, passend en nageleefd worden</b></p> <p>The company shall audit those systems and procedures which cover the requirements of the Standard to ensure they are in place, appropriate and complied with.</p>	Y	
3.3.1	<p><b>Interne audits moeten worden gepland en hun scope en frequentie moeten vastgesteld worden in relatie tot de risico's, die met de activiteit samenhangen. Audits moeten zodanig worden ingepland dat alle aspecten van de standaard tenminste jaarlijks geaudit worden.</b></p> <p>Internal audits shall be planned and their scope and frequency shall be established in relation to the risks associated with the activity. Audits shall be scheduled so that all aspects of the Standard are audited at least annually.</p>	Y	<p>The organisation has internal audit program in place to audit all systems and procedures to ascertain their compliance. Internal audit is done as per schedule once a year. Last round of internal audit was conducted</p> <p>Internal 03-01-2012 4 audits 03-2011 8 audits 02.08.2011 traceability/recall</p> <p>External audit: CC – SCA –ed.</p>
3.3.2	<p><b>Interne audits moeten worden uitgevoerd door passend getrainde medewerkers die bekwaam en onafhankelijk zijn van de geauditeerde afdeling</b></p> <p>Internal audits shall be carried out by appropriately trained competent personnel who shall be sufficiently independent from the department being audited to ensure impartiality.</p>	Y	<p>Audits carried out by QA manager who have been trained externally and experience as former lead auditor. Report seen for audit of training completed was well documented</p>
3.3.3	<p><b>Afwijkingen dienen gemeld te worden aan de verantwoordelijken en correctieve acties dienen te worden geïmplementeerd binnen een gestelde en haalbare periode.</b></p> <p>Deficiencies and details of non-conformities shall be notified to appropriate supervisory staff and corrective action implemented within a specified and appropriate time period.</p>	Y	<p>Results of the internal audit are reported within 5 days of the audit taking place to the personnel responsible for the activity audited. Corrective actions and appropriate timescales (6 weeks) for their implementation are agreed.</p>
3.3.4	<p><b>De afronding van corrigerende maatregelen moet zijn gedocumenteerd en geverifieerd</b></p> <p>The completion of corrective action shall be recorded and verified.</p>	Y	<p>Once corrective action forms have been completed by the responsible Manager the auditor is responsible for checking off actions. Action reviewed at monthly management meetings</p>

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3.3.5	<b>Interne audit rapporten moeten voldoende gedetailleerd zijn om zeker te stellen dat de conformiteiten alsook de tekortkomingen duidelijk zijn geïdentificeerd en geverifieerd.</b> Internal audit reports shall be sufficiently detailed to ensure that conformity as well as non-conformity can be clearly identified and verified.	<b>Y</b>	The internal /GMP audit reports of 2011 seen showed areas that were and were not in compliance with the requirements.
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### 3.4 Supplier approval and performance monitoring

Statement of Intent	<b>Het bedrijf dient procedures in werking te hebben voor goedkeuring en bewaking van haar leveranciers. Daaronder vallen ook de leveranciers van materialen en diensten geleverd t.o.v. vastgelegde eisen.</b> The company shall operate procedures for approval and monitoring of its suppliers. This shall include suppliers of materials and services to the company and ensure that materials and services procured conform to defined requirements.	<b>Y</b>	<p>All suppliers of products and services are approved by the Senior Management and entered onto the system before they can be used. Assessment is based on hygiene and quality risk with suppliers categorised in risk levels 1 to 3.</p> <p>High risk grade 1 suppliers are subject to audit before approval. Raw material assessments at intake forms part of the on-going review of supplier performance.</p> <p>Supplier approval procedure Ref PO5J issue 28-12-2011 was reviewed. Suppliers required to have completed a questionnaire, supplied 3rd party audit report or be audited.</p> <p>Seen report SVT 27-07-2011 Performance of subcontractors is reviewed annually, evidence seen of reviews of pest control contractor Rentokil.</p> <p>Purchases sought from 3 non-approved suppliers are not clear. 3 Suppliers hasn't an accepted status. The required responsibility to be approved by the purchasing manager is not clear.</p> <p>Minor</p>		
	3.4.1	Y	3.4.2	Y	<b>3.4.3 Purchases sought from 3 non-approved suppliers are not clear. 3 Suppliers hasn't an accepted status. The required responsibility to be approved by the purchasing manager is not clear.</b>
	3.4.3	N	3.4.4	Y	

### 3.5 Subcontracting of production

Statement of Intent	<b>Waar de productieprocessen worden uitbesteed, vindt deze plaats in overeenstemming met klanten. Procedures moeten worden ingevoerd voor de effectieve controle van onderaannemers en de uitgevoerde werkzaamheden.</b> Where production processes are subcontracted this shall be with the agreement of customers. Procedures shall be in place for the effective control of subcontractors and the work undertaken.	<b>N/A</b>	There are no activities outsourced	
	3.5.1	N/A	3.5.2	N/A
	3.5.3	N/A	3.5.4	N/A

### 3.6 Documentation control

Statement of Intent	<b>Het top management van het bedrijf moet waarborgen dat alle gedocumenteerde procedures, registraties en gegevens die kritisch zijn voor het beheer van productveiligheid wettelijkheid en kwaliteit aanwezig zijn en effectief beheerst worden.</b> The company's senior management shall ensure that documented procedures and recording forms critical to the management of product safety, legality and quality are in place and effectively controlled.	<b>Y</b>	<p>The company operates a computer based document control system with all documents issued with an issue dated, reference and authorisation. The central reference point for documents is the intranet with all printed documents classed as uncontrolled. The system was found to be working effectively; the document reference library on the computer system identifies changes.</p> <p>All documents checked had issue dated, reference and authorisation</p>	
	3.6.1	Y	3.6.2	Y
	3.6.3	Y		

### 3.7 Specifications

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Statement of Intent	<p><b>Het bedrijf dient ervoor zorg te dragen, dat er gepaste specificaties zijn voor: grondstoffen, tussenproduct en eindproduct. Elk product of service welke van invloed kan zijn op de integriteit van het eindproduct en het vereiste van de klant.</b></p> <p>The company shall ensure that appropriate specifications exist for raw materials, intermediate and finished products, and any product or service which could affect the integrity of the finished product and customer requirements.</p>	Y	The company has appropriate specifications exist for raw materials, intermediate and finished products, and any product or service which could affect the integrity of the finished product and customer requirements.
3.7.1	<p><b>Specificaties moeten geschikt en gedetailleerd zijn en moeten waarborgen dat wordt voldaan aan de relevante veiligheidsvoorschriften en wettelijke vereisten.</b></p> <p>Specifications shall be suitably detailed, accurate and shall ensure compliance with relevant product safety and legislative requirements.</p>	Y	<p>Specifications Examples raw materials: Foil FP 4500458525 Ink 90 LSH-12/FJ 32 Harder 00LRJ-11/DMO1 Lacquer 10LSI-32/FJ32 Glue UR 7780 Harder UR6080 Finished product 005582 3072 G</p> <p>Were reviewed and confirmed compliance with EU Regulation 1935/2004, 2023/2006, directive 2008/39/CE, 2002/72CE, regulation (EG) 10/2011 and regalement 282/2008 All specifications are documented and include criteria against contaminants where applicable. Contracts are in place concerning service suppliers (e.g. pest control Rentokil).</p>
3.7.2	<p><b>Het bedrijf moet over specificaties formele afspraken met de betrokken partijen nastreven. In het geval dat er geen formele specificaties zijn overeengekomen, moet het bedrijf aantonen dat er stappen zijn ondernomen om tot formele afspraken te komen.</b></p> <p>The company shall seek formal agreement of specifications with relevant parties. Where specifications are not formally agreed then the company shall be able to demonstrate that they have taken steps to put an agreement in place.</p>	Y	All the specifications are mutually agreed with customers, suppliers and service providers. E.g. Customer data sheets 2011

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3.7.3	<p>Een verklaring van overeenstemming dient te worden gehandhaafd en deze dient de gebruikers van het verpakkingsmateriaal te garanderen dat geen uitwisseling van stoffen kan plaatsvinden waarmee het verpakkingsmateriaal in contact kan komen.</p> <p>Deze verklaring van overeenstemming dient als minimum te bevatten:</p> <ul style="list-style-type: none"> <li>• de aard van de gebruikte materialen in bij de productie van het verpakkingsmateriaal</li> <li>• de bevestiging dat de materialen voldoen aan relevante wetgeving</li> <li>• de vermelding van eventueel toegepaste gerecyclede materialen</li> <li>• duidelijkheid over eventuele beperkingen bij het gebruik t.o.v. de verklaring van overeenstemming</li> </ul> <p>Producten dienen (voor zover bekend) minimaal te voldoen aan de wettelijke eisen van het land van productie en het land waar het product wordt toegepast.</p> <p>A declaration of compliance shall be maintained, which enables users of the packaging materials to ensure compatibility with the product with which the materials may be in contact.</p> <p>The declaration of compliance shall contain as a minimum:</p> <ul style="list-style-type: none"> <li>• the nature of the materials used in the manufacture of the packaging</li> <li>• confirmation that materials meet relevant legal requirements</li> <li>• the inclusion of any post-consumer recycled materials</li> <li>• this shall identify any limitations of use of the declaration of compliance.</li> </ul> <p>Products shall meet at least minimum legal requirements in the country of manufacture and use, where known.</p>	Y	<p>Declarations prepared during the product development process and approved by technical manager. Declarations viewed for the next product types, Foil FP 4500458525 Ink 90 LSH-12/FJ 32 Harder 00LRJ-11/DMO1 Lacquer 10LSI-32/FJ32 Glue UR 7780 Harder UR6080 Finished product 005582 3072 G</p> <p>And found to contain all required information</p>
3.7.4	<p><b>Handelsmerken / merknamen die vermeld worden op de verpakking zijn, waar gepast, formeel overeengekomen met relevante partijen.</b></p> <p>Trademarks for application on packaging materials shall, where appropriate, be formally agreed between relevant parties.</p>	Y	<p>Trademarked materials produced and formally agreed</p>
3.7.5	<p><b>Het bedrijf dient een procedure te hebben om de specificaties regelmatig te herzien.</b></p> <p>The company shall operate a specification review procedure.</p>	Y	<p>Documents are reviewed annually (f.i. by an internal audit) and reported into the management review meeting.</p>

### 3.8 Record Keeping

Statement of Intent	<p><b>Het bedrijf moet registraties bijhouden waaruit blijkt dat productveiligheid, wettelijke eisen en kwaliteit effectief worden beheerst.</b></p> <p>The company shall maintain records to demonstrate the effective control of product safety, legality and quality.</p>	Y	<p>Hard copy records are archived on site; electronic forms are backed up daily. Records are initialled or signed by the production manager or senior management representative. Records kept for 36 months as standard All documents seen are appropriately approved and procedures for storage of documents forms part of the quality manual</p>	
	3.8.1	Y	3.8.2	Y
	3.8.3	Y	3.8.4	Y

### 3.9 Traceability

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Statement of Intent	<p><b>Het bedrijf moet een systeem hebben voor de op tijdige wijze identificeren en traceren van product batches en het ononderbroken volgen daarvan in alle grondstoffen van het proces en in de distributie van het eindproduct tot de klant. Documenten dienen in alle stadia opvraagbaar te zijn.</b> The company shall have a system in place to identify product batches and to trace and follow all raw materials through processing to distribution of the finished product to the customer. Records shall be retrievable in a timely manner.</p>	Y	<p>The company has a system in place to identify product batches and to trace and follow all raw materials through processing to distribution of the finished product to the customer. Records are retrievable in a timely manner.</p> <p>Procedure 05K</p>
3.9.1	<p><b>De organisatie dient een systeem te hebben waarbij de grondstoffen getraceerd en gevolgd kunnen worden van de leveranciers en alle fases van de productie tot en met de distributie van het eindproduct en visa versa. Wanneer er continue gebruik is van grondstoffen bijv. opslag in bulk dient de traceerbaarheid op een zo praktisch mogelijke manier te zijn vastgelegd</b> The company shall have a system that has the ability to trace and follow all raw materials from the supplier through all stages of processing to distribution of the finished product and vice versa. Where continuous processes are used or raw materials are in bulk, the traceability of silos shall be achieved to the best practical level of accuracy.</p>	Y	<p>Traceability system operates through computer system and paperwork enables trace of raw materials from supplier through processes (including approximation for storage) to packing and despatch</p>
3.9.2	<p><b>Er dient een adequaat systeem aanwezig te zijn voor identificatie van producten, of lotnummer van een product zodat klanten het product kunnen identificeren indien traceerbaarheid vereist is.</b> An appropriate system shall be in place to ensure the customer can identify a product or production lot number for the product, for the purposes of traceability.</p>	Y	<p>Batch coding applied to all products via labelling on every production line, system connected to production management system</p>
3.9.3	<p><b>Het traceerbaarheidsysteem dient te worden getest van grondstof tot eindproduct en visa versa. Deze vindt plaats op een vooraf bepaalde frequentie, minimaal 1 x per jaar, en de resultaten hiervan dienen te worden vastgelegd voor inspectie.</b> The system shall be tested to ensure traceability can be determined from raw material to the finished product and vice versa. This shall take place on a predetermined frequency, at least on an annual basis, and results retained for inspection.</p>	Y	<p>Traceability undertaken by site for raw material to finished product and vice versa alternately on a 12 monthly basis.</p> <p>During the audit I test the recall procedure of the next product; Potato King FP 4500458525 with good results as outcome</p>

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### 3.10 Complaint handling

Statement of Intent	<p><b>Het bedrijf moet een systeem hebben voor het doelmatig verzamelen, registreren en beheren van productklachten.</b> The company shall have a system for the effective capture, recording and management of product complaints.</p>	<b>Y</b>	<p>Documented procedure PR 06, issue 28-11-2011 Complaints log managed by QA department. Records kept of all complaints received and action taken in monthly complaints files 2011-2012.</p> <p>Follow up in the daily operations meetings</p>	
	3.10.1	Y	3.10.2	Y
	3.10.3	Y		

### 3.11 Management of incidents, product withdrawals and recalls

Statement of Intent	<p><b>Het bedrijf moet een plan en systematiek hebben om incidenten, product terughaalacties en product recall doelmatig af te handelen en om er zeker van te zijn dat alle potentiële risico's met betrekking tot kwaliteit en hygiëne van de producten onder controle zijn.</b> The company shall have a plan and systems in place to effectively manage incidents, product withdrawals and recalls, in order to ensure that all potential risks to the quality, hygiene and legality of products are controlled.</p>	<b>Y</b>	<p>Documented ref PR 07 (issue 28-12-2011). Last test on 08-11-2011 to trace finished product SCA 11349 back to all raw materials – satisfactory full traceability achieved).</p> <p>Incidents requiring notification quality All details required covered in the appendix 13, and contact list up to dated. The Senior Plant Director is responsible for recall decisions and the team includes the Production Manager, and QA Manager. A folder holds contact lists for customers, and a page with useful emergency external contacts which is stored in the production office for 24 hour access to all appropriate personnel. The last recall test was performed on 08-11-2011, and it took 2 hours to identify all the affected stock. A report was produced and included in the management review. No recalls have been undertaken.</p> <p>During the audit I test the recall procedure of the next product; Potato King FP 4500458525 with good results as outcome</p>	
	3.11.1	Y	3.11.2	Y
	3.11.3	Y	3.11.4	Y
	3.11.5	Y	3.11.6	Y

## 4 SITE STANDARDS

### 4.1 External standards

Statement of Intent	<p><b>Alle terreinen van de locatie dienen op gepaste wijze te zijn afgewerkt en te worden onderhouden.</b> All grounds within the site shall be finished and maintained to an appropriate standard.</p>	<b>Y</b>	<p>Modern building, in good repair and well maintained with investment regularly planned. Located in a large industrial estate with green fields around the plant. No local activities that would affect product. The perimeter of the site is fenced and gated with 24 hour security. Condition of the site and buildings is checked as part of the weekly GMP audit. No issues with drainage and site " s yard and driveways are concrete and in suitable condition. Refuse is stored in a designated area, away from other activities.</p>	
	4.1.1	Y	4.1.2	Y
	4.1.3	Y	4.1.4	Y
	4.1.5	Y	4.1.6	N/A
	4.1.7	N/A		
	4.1.6 and 4.1.7 N/A there are no products stored outside			

### 4.2 Building fabric and interiors

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Statement of Intent	<p><b>De binnenkant van de gebouwen en voorzieningen dienen geschikt zijn voor het beoogde doel en zijn zo ontworpen, geconstrueerd, onderhouden en gecontroleerd effectieve controles om het risico van het besmettingen te voorkomen</b></p> <p>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.</p>			<b>Y</b>	<p>Floors are constructed of coated concrete with evidence of minor wear and tear, maintained through a documented maintenance programme.</p> <p>Protected fluorescent light tubes in use – no evidence of breakage. No evidence of water ingress. Existing glass windows fitted with shatter retaining plastic film.</p> <p>Ventilation provided through ceiling.</p>
	4.2.1	Y	4.2.2	N/A	4.2.2 Suspended ceiling are not used in production areas
	4.2.3	Y	4.2.4	Y	
	4.2.5	Y	4.2.6	Y	
	4.2.7	Y			

### 4.3 Utilities

Statement of Intent	<p><b>Alle voorzieningen naar en binnen de productie- en opslagruimten moeten zodanig ontworpen, geconstrueerd, onderhouden en bewaakt worden zodat het risico van productcontaminatie beheerst wordt.</b></p> <p>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.</p>			<b>Y</b>	<p>Water used for cleaning purposes is drawn from the water pipe (drinking quality water, provided by Water Supply Company. Annual certificate of analysis details held on file confirming portability.</p> <p>Analyses on the internet available however water are not allowed.</p> <p>There is no evidence available of pressured air. The monitoring to effectively control the risk of product contamination is not available.</p> <p>Minor</p>
	4.3.1	Y	4.3.2	<b>N</b>	<b>4.3.2. There is no evidence available of pressured air. The monitoring to effectively control the risk of product contamination is not available.</b>

### 4.4 Security

Statement of Intent	<p><b>Veiligheids overeenkomsten dienen te worden beoordeeld om de integriteit van producten en processen te waarborgen</b></p> <p>Security arrangements shall be assessed to ensure the integrity of products and processes.</p>			<b>Y</b>	<p>Site access is regulated. Perimeter is fenced and gated and areas where authorised personnel only are permitted are clearly marked.</p> <p>Security gate is staffed 24 hours a day by contracted security. All visitors sign in on entry and staffs are encouraged to report or challenge unidentified visitors. References supplied must be followed up, agency staff are verified by agency.</p> <p>External transport personnel have facilities and are not permitted in production areas.</p> <p>Backing up and securing of computer based systems occurs on a daily basis at the end of the day shift, procedure Job description reception</p>
	4.4.1	Y	4.4.2	Y	
	4.4.3	Y	4.4.4	Y	
	4.4.5	Y	4.4.6	Y	
	4.4.7	Y			

### 4.5 Layout and Product Flow

Statement of Intent	<p><b>De bebouwing en de fabriek dienen zodanig te zijn ontworpen, geconstrueerd en onderhouden. Er dienen procedures aanwezig te zijn om het risico van productbesmetting te beheersen en overeen dienen te komen met de relevante wetgeving.</b></p> <p>Premises and plant shall be logically designed, constructed and maintained. Procedures shall be in place to control the risk of product contamination and to comply with all relevant legislation.</p>			<b>Y</b>	<p>In one line-shaped flow of operations, goods in, warehouse, raw materials preparation area (e.g. removal of outer packaging), production, finishing, warehouse and dispatch. Warehouse stores raw materials and intermediate (work in progress) finished goods but adequately segregated and all items properly labeled. The modern site is roomy and adequate space available for all operations.</p>
	4.5.1	Y	4.5.2	Y	
	4.5.3	Y	4.5.4	Y	
	4.5.4	Y			

### 4.6 Equipment

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Statement of Intent	<b>Apparatuur zal op geschikte wijze ontworpen zijn voor het bedoelde gebruik en zal onderhouden en gebruikt worden waarbij het risico t.a.v. productveiligheid, wettigheid en kwaliteit wordt geminimaliseerd.</b> 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.			<b>Y</b>	All equipment is suitable for the intended purpose, and suitably clean. Procedure for the installation of new equipment (PR 02A) used, and includes notification to the cleaning and maintenance departments. No notices seen on production equipment. At the new equipment (arrived 2011) machine Comexi 8 is a validation report available.
	4.6.1	Y	4.6.2	Y	
	4.6.3	Y			

### 4.7 Maintenance

Statement of Intent	<b>Er moet een gedocumenteerd systeem voor gepland onderhoud geïmplementeerd zijn voor alle installaties die kritiek zijn voor productveiligheid wettelijkheid en kwaliteit</b> A documented system of planned maintenance shall be in place, covering all items of equipment and plant that are critical to product safety, legality and quality.			<b>Y</b>	There is an operating computerised maintenance plan available. All equipment visually checked by trained operatives before operation and post-production checks in place. Procedure PR 02A in place for post-maintenance line clearance. No wooden equipment in place, and no engineering workshops on site
	4.7.1	Y	4.7.2	Y	
	4.7.3	Y	4.7.4	Y	
	4.7.5	Y	4.7.6	Y	
	4.7.7	Y	4.7.8	Y	
	4.7.9	Y			

### 4.8 Staff Facilities

Statement of Intent	<b>Personeelsvoorzieningen moeten geschikt zijn voor het faciliteren van het benodigde aantal personeelsleden en moeten dusdanig ontworpen en gebruikt worden op dat risico op productcontaminatie minimaal is. Dergelijke voorzieningen moeten in goede staat en schoongehouden worden.</b> Staff facilities shall be sufficient to accommodate the required number of personnel, and designed and operated to minimise the risk of product contamination. Such facilities shall be kept in a good and clean condition.			<b>Y</b>	Gender specific locker and changing rooms provided with appropriate lockers for segregation of personal clothing and work wear, including toilets are available. A few lockers were open and dirty with potential risk for contamination. Staff canteen with refrigerator for staff food storage. Designated smoking area available inside of the main buildings. Hand washing facilities available at the entrance to the production areas for all staff with pictorial signage  Minor
	4.8.1	Y	4.8.2	Y	
	4.8.3	Y	4.8.4	N	<b>4.8.4 A few lockers were open and dirty with potential risk for contamination.</b>
	4.8.5	Y	4.8.6	Y	
	4.8.7	Y	4.8.8	Y	
	4.8.9	Y			

### 4.9 Housekeeping and Cleaning

### FUNDAMENTAL

Statement of Intent	<b>Er moeten systemen zijn voor orde, netheid en reiniging, waardoor gewaarborgd wordt dat de relevante hygiënenormen te allen tijde worden gehandhaafd en het contaminatierisico tot een minimum wordt beperkt.</b> Housekeeping and cleaning systems shall be in place, which ensure that appropriate standards of hygiene are maintained and that risk of contamination to the product is minimised.			<b>Y</b>	Housekeeping and cleaning systems are in place, which ensure that appropriate standards of hygiene are maintained and that risk of contamination to the product is minimised.
4.9.1	<b>Goede hygiënenormen dienen te worden gehandhaafd, incl. Een beleid 'schoon bij weggaan'</b> Good standards of housekeeping shall be maintained, which shall include a 'clean as you go' policy.			<b>Y</b>	„Clean as you go“ policy with an end of shift cleans down by operatives, verified visually by team leaders. Good standards of cleanliness at the time of the audit.

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4.9.2	<p><b>Alle interne oppervlakten van het gebouw, apparatuur en voertuigen dienen opgenomen te zijn in gedocumenteerde schoonmaakplannen. De schoonmaakplannen dienen de volgende informatie te bezitten:</b></p> <ul style="list-style-type: none"> <li>• <b>Onderdeel/gebied welke gereinigd dient te worden.</b></li> <li>• <b>Frequentie van de reiniging.</b></li> <li>• <b>Methode van reiniging.</b></li> <li>• <b>Reinigingsmiddelen.</b></li> <li>• <b>Verantwoordelijke voor de reiniging.</b></li> <li>• <b>Controle van de reinigingsschema's en een verantwoordelijke voor de verificatie.</b></li> </ul> <p>All internal surfaces of buildings, equipment and vehicles shall be subject to documented scheduled cleaning. Cleaning schedules shall include the following information:</p> <ul style="list-style-type: none"> <li>• responsibility for cleaning</li> <li>• item/area to be cleaned</li> <li>• frequency of cleaning</li> <li>• method of cleaning</li> <li>• cleaning materials to be used</li> <li>• cleaning record and responsibility for verification.</li> </ul>	<b>Y</b>	<p>Cleaning procedures (appendix P02R RF-06 and P05A RF 02 include all required detail, plus key inspection points. Regular review and training carried out in conjunction with chemical suppliers. Good records maintained to manage cleaning. Weekly deep clean conducted by contracted cleaning company</p>
4.9.3	<p><b>Schoonmaakmateriaal dient op een veilige aangewezen locatie bewaard te worden, zoals een gesloten kast</b></p> <p>Cleaning equipment and materials shall be kept in a secure designated location such as a locked cupboard.</p>	<b>Y</b>	<p>Locked cupboard used for all cleaning materials.</p>
4.9.4	<p><b>Chemicaliën die gebruikt bij reiniging, dienen te zijn voorzien van etiketten en dienen bewaard/opgeslagen te worden in gesloten flessen of vaten. De chemicaliën dienen gebruikt te worden volgens de voorschriften van de fabrikant.</b></p> <p>Cleaning chemicals shall be fit for purpose, suitably labelled, secured in closed containers and used in accordance with manufacturers' instructions.</p>	<b>Y</b>	<p>Chemicals are suitably labelled, and stored in a chemical locker. Containers are intact and cleaning instructions present.</p>
4.9.5	<p><b>Er worden geen chemicaliën gebruikt die sterk ruiken en daardoor zouden kunnen leiden tot productbesmetting.</b></p> <p>Chemicals that are strongly scented or could give rise to taint and odour contamination shall not be used.</p>	<b>Y</b>	<p>Unscented products only used.</p>
4.9.6	<p><b>Materialen en hulpmiddelen die gebruikt worden voor het schoonmaken van toiletten dienen gescheiden gebruikt en bewaard te worden.</b></p> <p>Materials and equipment used for cleaning toilets shall be segregated from those used elsewhere.</p>	<b>Y</b>	<p>Toilet cleaning chemicals stored in locked cabinets in toilets facilities.</p>

### 4.10 Waste and waste disposal

Statement of Intent	<p><b>Er moet voorzien zijn in geschikte mogelijkheden voor de opslag van proces- en ander afval.</b></p> <p>Suitable facilities shall be provided for the storage and disposal of process and other waste.</p>	<b>Y</b>	<p>Satisfactory systems in place. Designated refuse bins emptied by dedicated cleaning staff throughout shifts, waste intended for recycling collected and stored. Plastics off cuts are re-ground on site and sold to the raw material supplier. Trademarked goods not handled on site</p>	
	4.10.1	Y	4.10.2	Y
	4.10.3	Y	4.10.4	Y
	4.10.5	Y		

### 4.11 Pest control

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Statement of Intent	<b>Het bedrijf is verantwoordelijk voor het minimaliseren van het risico van plaagdieren op de vestiging</b> The company shall be responsible for minimising the risk of pest infestation on the site.				<b>Y</b>	Company has subcontracted the pest control activity to a professional pest control organisation, Rentokil, contract dated 2011, contract number available Contract number Rentokil: 3501767-2
						8 times a year inspection on rodents 8 times a year maintenance of fly-killing devices Last inspection 05-01-2012 Roducts: super caid wax bloc (outside) and Detex bloc (insitete) non tox Certificate of competence available Certificate number Rentokil: ISO9001 number: RQA934409
						Trend analysis during management review and Pestnet online system. No evidence of infestation was found or had recently been reported.
	4.11.1	Y	4.11.2	Y		
	4.11.3	Y	4.11.4	Y		
	4.11.5	Y	4.11.6	Y		

### 4.12 Transport, storage and distribution

Statement of Intent	<b>Transport, opslag en distributie van grondstoffen en eindproducten dient dusdanig plaats te vinden, dat het risico van besmetting en opzettelijke inmenging wordt geminimaliseerd.</b> The transport, storage and distribution of raw materials and finished products shall be undertaken in a manner to minimise the risk of contamination or malicious intervention.				<b>Y</b>	There is no external silo storage. Specified storage areas within the warehouse include raw materials, intermediate goods and finished products. Finish products transport is subcontracted to A2B and Pronk Raw material transport arranged by suppliers and procedure in place to visually check loads prior to intake into warehouse
	4.12.1	Y	4.12.2	Y		
	4.12.3	Y	4.12.4	Y		
	4.12.5	Y	4.12.6	Y		
	4.12.7	Y	4.12.8	Y		
	4.12.9	Y	4.12.10	Y		
	4.12.11	Y	4.12.12	Y		
	4.12.13	Y				

## 5 PRODUCT DESIGN AND PROCESS CONTROL

### 5.1 Product design and development

Statement of Intent	<b>Een procedure voor product ontwerp en de ontwikkeling van processen worden gebruikt voor de productie van veilige en wettelijke producten om aan bepaalde kwaliteitsnormen en parameters te voldoen.</b> Product design and development processes shall be in place to ensure the production of safe and legal products to defined quality parameters.				<b>Y</b>	PR 02A issue 28-12-2011 document the procedure for product design and development and incorporate consideration of all required points and forms the specification. Product concept, artwork (where applicable) and specification approval forms part of sales procedure PR 11
	5.1.1	Y	5.1.2	Y		
	5.1.3	Y	5.1.4	Y		
	5.1.5	Y	5.1.6	Y		

### 5.2 Packaging print control

Statement of Intent	<b>Indien verpakkingsmateriaal voorzien wordt van allergenen/veiligheids/wettelijkheids informatie dan dienen procedures aanwezig te zijn om zeker te stellen dat deze informatie voldoet aan de wetgeving en aangebracht is op basis van specificaties van de klant.</b> Where packaging is printed with allergen/safety/legal information, procedures shall be in place to ensure that the information is fully legible and correctly printed to the customer's specification.				<b>Y</b>	Packaging is printed with allergen/safety/legal information. Procedure PO2F and RF-01 are in place to ensure that the information is fully legible and correctly printed to the customer's specification.
						N/A Where composite print is used (a mixture of different designs are printed together), a process shall be in place to ensure effective segregation of differing print variants.
	5.2.1	Y	5.2.2	Y		
	5.2.3	Y	5.2.4	Y		
	5.2.5	Y	5.2.6	N/A	5.2.6 N/A No composite print is used (a mixture of different designs are printed together)	

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5.2.7	Y	5.2.8	Y
5.2.9	Y	5.2.10	Y

### 5.3 Process control

Statement of Intent	<b>Er dienen procedures te zijn om doeltreffend kwaliteit borging systeem van de activiteiten gedurende het gehele proces te garanderen</b> Procedures shall be in place to ensure effective quality assurance of operations throughout the process.	<b>Y</b>	Procedures are in place to ensure effective quality assurance of operations throughout the process.
5.3.1	<b>Het bedrijf dient een evaluatie van het productieproces uit te voeren en, indien van toepassing, van het drukproces ten behoeve van het identificeren van kritische productie controlepunten die invloed kunnen hebben op de kwaliteit van de geproduceerde producten.</b> The company shall undertake a review of the manufacturing and, where applicable, printing process to identify critical manufacturing process control points that could affect the quality of the products produced.	<b>Y</b>	The company undertake a review of the manufacturing and printing process to identify critical manufacturing process control points that could affect the quality of the products produced.  P02F and RF-01
5.3.2	<b>Bij elke kritisch controle punt dient er een gedocumenteerde controles te worden uitgevoerd. Machine instellingen en productie limieten dienen te zijn gedocumenteerd volgens de product specificaties</b> For each critical manufacturing process control point, machine settings or process limits shall be established and documented – the process specification.	<b>Y</b>	There are no critical manufacturing process control points  Production specifications are available for all products which include equipment settings. Specifications are approved internally by both the Production and Technical Management.
5.3.3	<b>Bij de productie dienen er gedocumenteerde controles te worden uitgevoerd voor het opstarten en/of instellingen van de apparatuur. Dit dient periodiek en tijdens de productie te worden uitgevoerd om aan te tonen dat de producten worden geproduceerd volgens de afgesproken kwaliteit specificaties</b> 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.	<b>Y</b>	Technical Manager is responsible for signing off any changes to process parameters.
5.3.4	<b>Er dient een procedure voor goedkeuring om ervoor te zorgen dat bij het opstarten, dat de lijn vrij/schoon is van alle voorgaande productie en werkdocumenten.</b> A clearance procedure shall be in place to ensure that at start up, the line is clear of all previous work and production documents.	<b>Y</b>	There is clearance procedure shall be in place ref. PR 05I issue 28-12-2011
5.3.5	<b>Leveranciers die materialen leveren moeten een bewijs leveren dat de producten voldoen aan de conformiteit.</b> Suppliers of incoming materials, as appropriate, shall provide evidence of conformity.	<b>N</b>	Declaration of Compliance or certificate of analysis requested on a batch basis from suppliers.  Not available is the migration document of TPL NT-03 Mydibel 15003.012.760014 X021774-760-015 ANT 10783ei  Minor

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5.3.6	<p><b>Kwaliteitscontroles dienen worden uitgevoerd om aan te tonen dat het eindproduct binnen de toleranties die in de overeengekomen product specificaties staan beschreven en voldoen aan alle kritische en wettelijke eisen.</b></p> <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.</p>	<b>Y</b>	<p>PR 03A issue 28-12-2011 viewed – quality checks required for Foil FP 4500458525 Ink 90 LSH-12/FJ 32 Harder 00LRJ-11/DMO1 Lacquer 10LSI-32/FJ32 Glue UR 7780 Harder UR6080 Finished product 005582 3072 G</p>
5.3.7	<p><b>In het geval van wijzigingen in de samenstelling van het product, de werkmethode of apparatuur, zal het bedrijf, waar nodig, de proces karakteristieken aanpassen en deze gegevens valideren om de veiligheid, wettelijkheid en kwaliteit van de producten te bereiken.</b></p> <p>In the event of changes to product composition, processing methods or equipment, the company shall, where appropriate, re-establish process characteristics and validated product data to ensure product safety, legality and quality are achieved.</p>	<b>Y</b>	<p>All new products are grouped into modules of the hazard and risk management plan, if appropriate. New modules created as required. Signed off by hazard and risk management team leader.</p>

### 5.4 Product inspection and analysis

Statement of Intent	<p><b>Het bedrijf dient gebruik te maken van adequate procedures en faciliteiten bij onderneming of onderaanneming waarbij inspectie en analyses van cruciaal belang zijn voor veiligheid van het product, wettigheid en kwaliteit.</b></p> <p>The company shall use appropriate procedures and facilities when undertaking or subcontracting inspection and analyses critical to product safety, legality and quality.</p>	<b>Y</b>	<p>All product inspection takes place on-site and follows procedures appropriate to product. E.g. quality control of film, visual control during the production, parameters of the equipment. Analyses of the material are done by the supplier. Seen several certificates and migration tests Foil FP 4500458525 according accreditations. As example Intertek.</p>	
	5.4.1	Y	5.4.2	Y
	5.4.3	Y	5.4.4	Y
	5.4.5	Y		

### 5.5 In-line testing and measuring equipment

Statement of Intent	<p><b>Het bedrijf dient aan de hand van de gevaren en risicoanalyse te bepalen of de in-line testen noodzakelijk zijn om de integriteit en kwaliteit van de producten zeker te stellen</b></p> <p>The company shall use hazard and risk analysis principles to determine the need for in-line product testing equipment to ensure the integrity and quality of products.</p>	<b>Y</b>	<p>Measurement equipment which is critical for the production process is in place. All product inspection takes place on-site and follows procedures appropriate to product. E.g. quality control of film, visual control during the production, parameters of the equipment.</p>	
	5.5.1	Y	5.5.2	Y
	5.5.3	Y	5.5.4	Y

### 5.6 Calibration

Statement of Intent	<p><b>Meetapparatuur voor gebruikt van monitoring / bewaking van kritische processtappen en monitoring productconformiteit en de veiligheid, kwaliteit en wettelijkheid van product borgen en te garanderen moet worden gekalibreerd.</b></p> <p>Measuring equipment used to monitor critical manufacturing process points and product safety and legality shall be calibrated.</p>	<b>Y</b>	<p>For the critical process steps (part of risk analyses) measuring equipment used to monitor critical manufacturing process points monitoring is in place according P05F RF 02. Examples: Weighing equipment, measurement of paper length, Computer for colours, measurements to calibrate the strengths of the carton.</p>	
	5.6.1	Y	5.6.2	Y
	5.6.3	Y	5.6.4	N/A

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	5.6.5	Y		The identified measuring equipment shall be prevented from adjustment by unauthorized staff and shall be protected from damage, deterioration and misuse is N/A because no unauthorized staffs in the factory is able to work with the equipment.
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### 5.7 Control of non-conforming product

Statement of Intent	<p><b>Het bedrijf moet garanderen dat alle producten die niet aan de specificaties voldoen, duidelijk zijn geïdentificeerd, geëtiketteerd en in quarantaine gehouden worden.</b> The company shall ensure that out-of-specification product is clearly identified, labelled and quarantined.</p>			Y	Documented: PR 05J. Non-conforming product is labelled with "Blockade form" notice which details dated, product, reason, NC no. and signature. Decisions made within 2 hours by Production Manager. Records kept of non-conformance and action taken. Main issues at start-up and product changeover. Clear quarantine area in each storage area. Raw materials usually returned to supplier
	5.7.1	Y	5.7.2	Y	
	5.7.3	Y			

### 5.8 Foreign body contamination control

Statement of Intent	<p><b>Alle praktisch mogelijke maatregelen dienen genomen te zijn om het risico van vreemde voorwerpen besmetting te identificeren, te vermijden, uit te sluiten of minimaliseren.</b> All practicable steps shall be taken to identify, avoid, eliminate or minimise the risk of foreign body contamination.</p>			Y	All practicable steps are taken to identify, avoid, eliminate or minimise the risk of foreign body contamination.
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#### 5.8.1 Foreign body control

	5.8.1.1	Y	5.8.1.2	Y	All items required are in place. Glass breakage procedure viewed PR05H. Issue 28-12-2011 No glass breakages recorded in last 12 months.
	5.8.1.3	Y	5.8.1.4	Y	
	5.8.1.5	Y			

#### 5.8.2 Sharps control

	5.8.2.1	Y	5.8.2.2	Y	Sharps policy forbids any sharps in production area. Blades used for unwrapping pallets are counted in and out at the start and end of each shift. On the Notice board are no loose fastenings
	5.8.2.3	Y	5.8.2.4	Y	
	5.8.2.5	Y			

#### 5.8.3 Chemical and biological control

Statement of Intent	<p><b>Ter voorkoming van besmetting van chemische of biologische gevaren moeten er controles worden uitgevoerd.</b> Controls shall be in place to prevent contamination from chemical or biological hazards.</p>			Y	Food grade lubricants used. Microbiological hazards identified through hazard and risk management system
	5.8.3.1		5.8.3.2		

## 6 PERSONNEL

### 6.1 Training and competence

Statement of Intent	<p><b>Het bedrijf moet er voor zorgen dat het personeel voldoende zijn opgeleid en geïnstrueerd om hun eigen werkzaamheden te kunnen uitvoeren en bevoegd zijn om hun functie uit te voeren.</b> The company shall ensure that all employees are adequately trained, instructed and supervised commensurate with their activity and are competent to undertake their job role.</p>			Y	The company ensure that all employees are adequately trained, instructed and supervised commensurate with their activity and are competent to undertake their job role.
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6.1.1	<p><b>Al het personeel, inclusief tijdelijke medewerkers en aannemers, moeten voor aanvang van hun werkzaamheden op gepaste wijze getraind en voldoende begeleid worden tijdens de werkzaamheden. Het trainingsprogramma dient de bedrijfshygiëne regels te bevatten.</b></p> <p>All personnel, including temporary personnel, shall be appropriately trained prior to commencing work and adequately supervised throughout the working period. Induction training shall include the company hygiene rules.</p>	<b>Y</b>	<p>Induction training is conducted upon recruitment and also before starting the day's / shift's work. The employees are briefed about the activity and are adequately supervised e.g. several training in 2011 like Hygienic rules 10-2011 All visitors are accompanied</p>
6.1.2	<p><b>Het bedrijf moet routinematig de competenties van het personeel beoordelen en waar van toepassing, relevante training geven. Dit dient alle gevaren inzake kwaliteit, mogelijke contaminatie en voedselveiligheid, inclusief die gevaren die specifiek zijn voor het vaststellen van kritische proces stappen te bevatten.</b></p> <p>The company shall routinely review the competencies of staff and provide relevant training as appropriate. This shall cover all packaging quality assurance, potential contamination and safety hazards, including those specific to established critical process steps.</p>	<b>Y</b>	<p>Effectiveness of the training is reviewed by evaluation of the trainees, understanding the training Key procedures such as hand washing are every ware available</p>
6.1.3	<p><b>Er dienen registraties van de trainingen te worden bijgehouden voor al het huidige en recente personeel</b></p> <p>Records of training shall be kept for all current and recent key employees.</p>	<b>Y</b>	<p>5 random records assessed all satisfactory. Map training</p>
6.1.4	<p><b>Er dient een programma voor opfrustrainingen aanwezig te zijn.</b></p> <p>A programme of refresher training shall be in place.</p>	<b>Y</b>	<p>Competence and training matrix maintained and reviewed 6 monthly.</p>
6.1.5	<p><b>Het bedrijf moet gedocumenteerde programma's in werking hebben om aan te tonen dat de training effectief is en regelmatig wordt geëvalueerd.</b></p> <p>The company shall document training procedures and records to demonstrate that training is effective and regularly reviewed.</p>	<b>Y</b>	<p>Training procedures viewed 06B) with evaluation by delegates. Results record into management review.</p>

### 6.2 Access and movement of personnel

Statement of Intent	<p><b>Het bedrijf dient er voor te zorgen dat toegang en looppistes van personeel, bezoekers en aannemers de productveiligheid niet in gevaar brengen.</b></p> <p>The company shall ensure that access and movement of personnel, visitors and contractors shall not compromise product safety and quality.</p>	<b>Y</b>	<p>Review of access and personnel movement completed. Plan of site last updated 28-12-2011. Clear painted walkways with physical barriers show route from staff entrance through production to stores. 1 sets of staff facilities – entry to warehouse and ingredient stores and separate facilities for van shed and Dispatch area</p>	
	6.2.1	Y	6.2.2	Y
	6.2.3	Y		

### 6.3 Personal hygiene

Statement of Intent	<p><b>De hygiënenormen van het bedrijf moeten zijn gedocumenteerd en aanvaard door al het personeel, met inbegrip van aannemers en bezoekers aan de productie. Deze normen moeten specifiek geformuleerd zijn met betrekking tot risico's op productcontaminatie.</b></p> <p>The company's personal hygiene standards shall be documented and adopted by all personnel, including visitors to the production facility. These standards shall be developed with due regard for risk of product contamination.</p>	<b>Y</b>	<p>Procedure 05C personnel hygiene policy, part of the hygiene policy. Jewellery policy = 1 plain wedding band only. No earrings or other exposed jewellery. Hygiene policy also covers fingernails, eating and drinking in production area, hand washing, and use of personal medicines in production area.</p>	
	6.3.1	Y	6.3.2	Y
	6.3.3	Y	6.3.4	Y
	6.3.5	Y	6.3.6	Y
	6.3.7	Y	6.3.8	Y
	6.3.9	Y		

### 6.4 Medical Screening

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Statement of Intent	<b>Er dienen gezondheidsregels te zijn opgesteld zodat deze geen negatieve invloed hebben op veiligheid van het product. Deze dienen te worden bewaakt en gecontroleerd</b> Health conditions likely to adversely affect product safety shall be monitored and controlled.				Y	The company has documented medical screening procedure and all employees undergo medical screening before joining work and later at regular intervals. Records of medical screening are maintained. Declaration is sought from the visitors regarding their health and briefed to notify in case of any contagious disease. Documented personnel hygiene and safety. Ref. Procedure 05C and signed hygiene and health rules dated 2011 Plasters are issued where required and logged.
	6.4.1	Y	6.4.2	Y		
	6.4.3	Y				

### 6.5 Protective clothing

Statement of Intent	<b>Geschikte beschermende kleding dient gedragen te worden in de productie en opslag ruimtes ter voorkoming van besmetting</b> Appropriate protective clothing shall be worn in production and storage areas to minimise the risk of product contamination.				Y	Clothing is suitable for use and issued to all the employees. They are provided in sufficient numbers for each employee. Disposable mob hats provided. Safety shoes also provided. Disposable visitor's coats and hat provided. Deemed adequate for clean clothing for each shift, Protective clothing can be worn around the site, but must not be worn on travel to or from the site. All staff seen wearing suitably clean clothing
	6.5.1	Y	6.5.2	Y		
	6.5.3	Y	6.5.4	Y		
	6.5.5	Y	6.5.6	Y		
	6.5.7	Y	6.5.8	Y		
	6.5.9	Y	6.5.10	Y		
	6.5.11	Y				

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