



BRC Packaging Materials Issue 6 Documentation Kit – Product Safety & Quality Management System

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BRC Global Standard for Packaging Materials Issue 6 Manual

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1 Senior Management Commitment

1.1 Senior Management Commitment and Continual Improvement – Fundamental

The execution of requirements of the Global Standard for Packaging Materials which includes active communication, systems of management review and providing of adequate resources to effect continual improvement is dedicated by the company's senior management. Implement and fully document identified opportunities for improvement.

1.1.1 Quality aspects, safety and legality of the products manufactured at the site is documented as product safety and quality policy (as per Annexure IV of this manual) which is established by the site's management, communicated to all team members through trainings and meetings by top management after the policy is signed.

1.1.2 To develop and improve the quality and product safety culture in the plant in addition to the policy the management has prepared a quality and product safety culture plan that covers the timescales and review of the effectiveness of activities which can impact on product safety and quality.

1.2 Management Review

To check effective implementation of the product safety and quality program a management review is undertaken at least once in six month by the company management which also ensures that opportunities for improvement are identified. A commitment to satisfying applicable requirements;

1.2.1 The following are evaluated in the review process:

- Action plans and documents of previous management review.
 - Audits of internal, second-party and third-party.
 - Feedback, objections and customer performance indicators.
 - HARM (hazard and risk management) system effectiveness review.
 - Any changes in applicable legislative and certification scheme impacts.
 - Out-of-specification results, non-conforming materials, incidents and corrective measures.
 - Necessity of resources.
 - Performance against targets.
 - Efficiency on defence and fraud prevention on product.
 - Efficiency on the root causes analysis and corrective measures.

1.3 Organizational Structure, Responsibilities and Management Authority

As mentioned in Annexure V of this manual, the responsibilities, reporting relationships and job functions of those personnel whose activities that affect product safety, legality, regulatory compliance and quality are defined in a clear organizational structure by the Company.

3 Product Safety and Quality Management

3.1 Product Safety and Quality Management System

For the production of a safe and legal product the requirements of the BRC Global Standard for Packaging Issue 6 are documented in the site's processes and procedures to allow consistent application, facilitate training and support due persistence. As per the requirements of the Standard are fully implemented, reviewed at appropriate planned intervals and improved.

- 3.1.1 For effective understanding and implementation of documented procedures, working methods and practices are prepared /translated in local language and also are collated in form of a manual which is navigable and readily accessible onsite

3.2 Document Control

Effective control is ensured by the site's management (Management Representative) that documented procedures and recording forms critical to the management of product safety, legality and quality are in place.

- 3.2.1 A documented procedure (Document and Data Control) which includes list of all controlled documents indicating their latest version number, the method for their identification and authorization, a record of the reason for any changes or amendments to documents and the system for the replacement of existing documents when these are updated is prepared for the effective control of the documents.

3.3 Record Completion and Maintenance

To demonstrate effective control of product safety, legality and quality records are maintained by the site.

- 3.3.1 As defined in the procedure for control of records, they should be legible, genuine, appropriately authorized and retained in good condition for an appropriate defined time period. For the records maintained in electronic media proper control as per the IT system is to be established.

3.4 Specifications – Fundamental

As defined in Quality Plan, the integrity of the finished product and customer requirements is ensured in the site that appropriate specifications exist for raw materials, intermediate and finished products and for any product or service is provided.

3.5 Internal Audits – Fundamental

The site ensures the audit of systems and procedures as per the requirements of the Global Standard for Packaging are in place, appropriate and complied.

- 3.5.1 All aspects of the product safety and quality management system are audited by audits that cover the hazard and risk management system, PRPs and all other procedures at least once in six months.

Hazard Identification Procedure

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 4.1 Hazard Identification and Analysis 4

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1 Purpose

Product safety hazards must be identified and mitigated according to a uniform approach.

2 Scope

It covers all stages of raw materials receipt, processing and storage of final products, as well as identifying hazards related to product safety throughout all locations.

3 Responsibility

A hazard analysis is done by the Product Safety Team.

4 Description of Activity

Hazard Identification and Analysis:

- a) Various factors, such as initial assessment, product description, Traffic Flow Diagram, and Process Flow Diagram are used to determine existing and potential hazards.
- b) Process Flow Charts identify potential hazards like Physical, Chemical, Biological, and Quality and record them on the Hazard Analysis Charts.
- c) It is mandatory to conduct hazard analysis for each process step and new product. Likewise, the hazard analysis done for a product type or process type must be reviewed and validated if a change is made in raw materials, product formulation, preparation, processing, packaging, and distribution as well as the intended use of the product.
- d) Hazards associated with the inputs are identified and analyzed, and they are divided into four main categories:
 - Biological Hazards
 - Physical Hazards
 - Chemical Hazards
 - Quality Hazards
- e) A list of control measures is created for each identified hazard in order to help prevent, reduce or eliminate it.
- f) Product Safety Team validates the hazard chart after finalization. The team includes a few other members from other plants or offices.

Internal Audit Procedure

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1 Purpose

All operations and activities under this procedure are to be subject to an internal quality and product safety audit in accordance with the procedures and responsibilities established. Furthermore, it is used to evaluate whether the quality and product safety system is working as well as it should be and make changes where necessary.

2 Scope

To verify that the system is being implemented successfully, this procedure applies to all activities described in the BRC Packaging Material Manual and accompanying procedures and documents.

3 Responsibility

- 3.1 The Management Representative is in charge of audit planning and execution. In addition, he is assisted by the auditors, typically chosen from within the organization. The auditor must be someone who has been trained in the relevant field but does not actually work in the audited field. Management Representatives can also employ outside auditors if required.
- 3.2 A BRC Product Safety Management System audit must be carried out in accordance with the plan. Internal Auditors must ensure that the system is being implemented effectively.
- 3.3 Top Management, Functional Heads, and other relevant staff are responsible for cooperating with audits and creating and updating audit records expeditiously.

4 Description of Activity

4.1 Audit Schedule

- 4.1.1 An audit plan is prepared by the Management Representative based on the month in which the last audit was conducted, the month of the planned audit and the next audit month. A quality and product safety system audit includes all aspects. According to the activity status, importance and audit findings from previous years, audits are scheduled.

4.2 Planning and Scheduling of Audits

There is a detailed audit plan prepared with the names of the activities, the scope of the audit— both full and partial, the date and time, and the auditor. It is then circulated to the concerned person/verbally informed to the Auditor/Auditee.

SOP for Protection from Product Adulteration

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1 Policy

Product adulteration is prevented.

2 Purpose

To prevent adulteration with lubricants, fuel, pesticides, cleaning compounds, sanitizing agents, metal fragments or other chemical or physical contaminants in the product, product contact surfaces and product packaging materials.

3 Scope

The product packaging materials are protected by the maintenance team take from production department is described in this procedure.

4 Responsibility

This procedure is implemented by the sectional in-charges under the supervision of the factory manager.

5 Procedure

1. In the work area acknowledge all the materials lying.
2. Recognize sanitizing agents used and all cleaning compounds to store away from the process area.
3. During operation, possible contamination sources are checked every day.
4. Avoid direct sunlight from the flavouring agents.
 - Properly label and separately store all product-grade lubricants.
 - Within the maintenance area, person in charge stores and properly labels all non-product lubricants. Within the facility fuel storage is avoided. Before production starts again the area will be thoroughly cleaned and inspected after the work is finished.
 - During operation, possible contamination sources are inspected by Head of Production in the processing area every day.
 - The Head of QC inspects every day during operations the product processing area for possible sources of contamination, including condensate. Daily Sanitation Audit Form is maintained to record the results.

INTERNAL AUDIT NON-CONFORMITY REPORT			
NC Report No:		Date:	
Department / Function:		Document Ref:	
Auditor:		BRC Packaging Material, Issue 6 Clause No:	
Audit Criteria:		Control #:	
Description of Non-Conformity:			
Person Responsible:			
Date of Completion	Planned:	Actual:	
Auditee:		Auditor:	
Signature		Signature	
Root Cause of Non-Conformity:			
Action Taken to Resolve the Non-Conformities:			
Corrective Action Taken:			
Review of Action Taken:		Status:	☐ Closed ☐ Open
		Signature:	
		Date:	
Planned Date for Reviewing Effectiveness:			
Review of Effectiveness of Action Taken (Next Audit):			
Effectiveness Checked On	Date:	Sign:	