We have written this workbook to assist in the implementation of your BRCGS Packaging Safety and Quality Management System. The workbook is divided into 8 steps that are designed to assist you in implementing your packaging safety and quality management system effectively:

- ✓ Step One: Introduction to the BRCGS Packaging Safety and Quality Management System
- ✓ Step Two: Senior Management Implementation
- ✓ Step Three: Implementation Plan
- ✓ Step Four: Packaging Safety and Quality Management System
- ✓ Step Five: HARA Implementation
- ✓ Step Six: BRCGS Implementation & Training
- ✓ Step Seven: Internal Auditing/System Assessment
- ✓ Step Eight: Final Steps to BRCGS Certification

The Workbook guides you through the process of implementing our BRC Packaging Safety and Quality Management System, which is an ideal package for Food Packaging Manufacturers looking to meet BRC Global Standard (Issue 7) for Packaging Materials.

This comprehensive package contains:

- ✓ Comprehensive Packaging Safety and Quality Procedures
- ✓ PSQMS Record Templates
- ✓ HARA Manual
- ✓ Laboratory Quality Manual
- ✓ Training Modules and Exams
  - → BRCGS Packaging Safety and Quality Management System
  - → Internal Audit Training
  - → HACCP Training
- ✓ Verification and Validation Record Templates
- ✓ Free online technical support via e-mail and/or Skype

As a preliminary to Step 1 we recommend that the you obtain a copy of the current issue of the BRCGS Global Standard for Packaging and Packaging Materials Issue 7

Step 2: Senior Management Implementation

A Senior Management Implementation checklist is provided that establishes your Packaging Safety and Quality Management System fundamentals including Safety Policies and Objectives.

The checklist guides Senior Management:

- ✓ in planning the establishment of the Packaging Safety and Quality Management System
- ✓ in providing adequate support to establish the Packaging Safety and Quality Management System
- ✓ in ensuring there is adequate infrastructure and work environment
- ✓ in allocating responsibility and authority

This stage requires the Senior Management to meet and establish the foundations for the Packaging Safety and Quality Management System:

- ✓ Formulating a checklist of Customer, Regulatory, Statutory and other relevant requirements
- ✓ Decide which requirements the company should address and develop relevant policies.
- ✓ Based on the Packaging Safety and Quality Policy Management Policies establish Packaging Safety and Quality Objectives
- ✓ Define the scope and boundaries of the Packaging Safety and Quality Management System
- ✓ Plan the establishment of the Packaging Safety and Quality Management System using the project planner
- ✓ Provide adequate support to establish the Packaging Safety and Quality Management System
- ✓ Ensure there is adequate infrastructure and work environment
- ✓ Allocate responsibility and authority
- ✓ Assess, plan and establish appropriate internal and external communication channels
- ✓ Defining and maintaining a plan for the development and continuing improvement of a product safety and quality culture

As a decision has already been made to implement a system compliant with the BRC Global Standard for Packaging Materials, the Senior Management meeting should consider the requirements of the Standard for Senior Management which are summarised in the table and should be read direct from the Standard.

Senior Management Packaging Safety and Quality Management System Implementation Meeting

Set Date, Time and Venue

Agenda

1. Formulating a checklist of Customer, Regulatory, Statutory and other relevant requirements
2. Decide which requirements the company should address and develop relevant policies.
3. Based on the Packaging Safety and Quality Policy Management Policies establish Packaging Safety and Quality Objectives
4. Define the scope and boundaries of the Packaging Safety and Quality Management System
5. Plan the establishment of the Packaging Safety and Quality Management System using the project planner
6. Provide adequate support to establish the Packaging Safety and Quality Management System
7. Ensure there is adequate infrastructure and work environment
8. Allocate responsibility and authority
9. Assess, plan and establish appropriate internal and external communication channels
10. Defining and maintaining a plan for the development and continuing improvement of a product safety and quality culture

Attendees:

Senior Management Team		
Job Title	**Name**	**Role in Team**
Chief Executive		Chairman
General Manager		Deputy Chair
Operations Manager		Operations Reporting
Quality Manager		Packaging Safety and Quality Reporting
Planning Manager		Planning and Capacity Reporting
Distribution Manager		Distribution Reporting
Maintenance Manager		Services and Engineering Provision
Finance Manager		Financial Reporting
Human Resources Manager		Resource reporting

Senior Management Packaging Safety and Quality Management System Implementation Checklist

The Senior Management Packaging Safety and Quality Management System Implementation Meeting should follow the guidelines of the Senior Management Implementation Checklist:

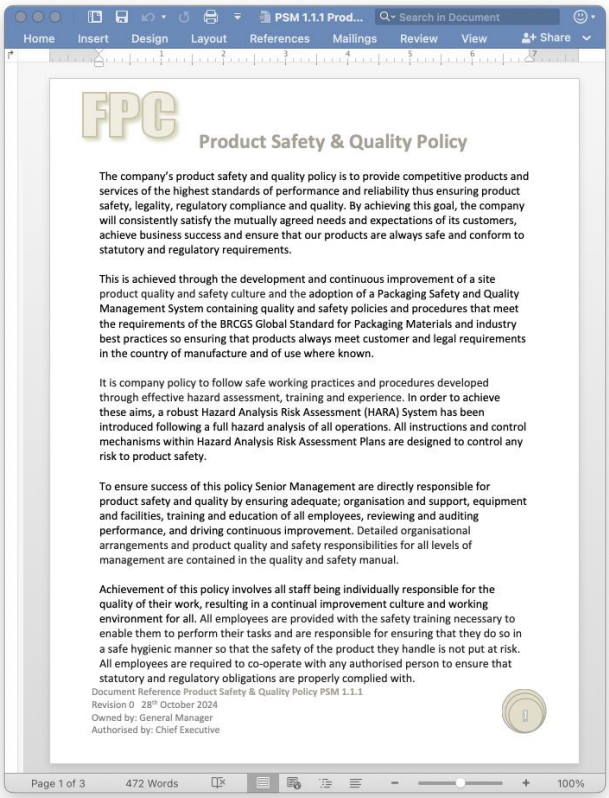
Action (i)	Senior management formulate a checklist of Customer, Regulatory, Statutory and other relevant requirements	
	Customer/Regulatory/Statutory/Other	Record Details
	XYZ Customer Requires this	
	BRCGS Global Standard for Packaging Materials Issue 7	
	Regulations for materials in contact with food	
Action (ii)	Senior Management decides which Packaging Safety and Quality requirements the company should address and develop relevant policies.	
	Requirement	Policy Details

At a later stage Senior Management will be required to carry out a management review		
After implementation and verification Senior Management take action to continually improve the Packaging Safety and Quality Management System		

The outputs from this meeting will be:

- ✓ Packaging Safety and Quality Policy
- ✓ Packaging Safety and Quality Objectives
- ✓ Defined Scope
- ✓ A Developed Project Planner
- ✓ Support Plan for Implementation/Training
- ✓ Plans for Infrastructure/Work Environment/Prerequisites
- ✓ Allocation of Responsibility/Authority
- ✓ Defined Communication Channels
- ✓ A plan for the development and continuing improvement of a product safety and quality culture

Senior Management can choose/adapt the templates supplied with the system to assist in documenting policies and objectives:



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Product Safety & Quality Policy

The company's product safety and quality policy is to provide competitive products and services of the highest standards of performance and reliability thus ensuring product safety, legality, regulatory compliance and quality. By achieving this goal, the company will consistently satisfy the mutually agreed needs and expectations of its customers, achieve business success and ensure that our products are always safe and conform to statutory and regulatory requirements.

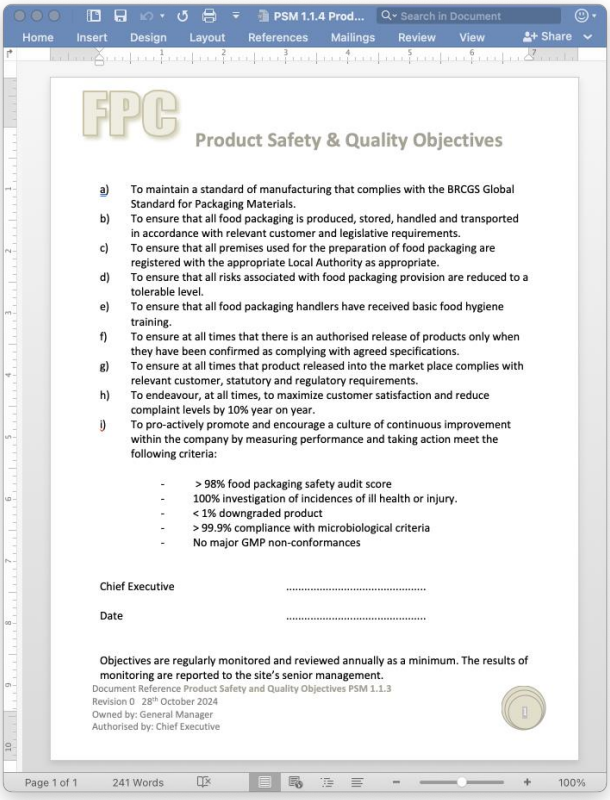
This is achieved through the development and continuous improvement of a site product quality and safety culture and the adoption of a Packaging Safety and Quality Management System containing quality and safety policies and procedures that meet the requirements of the BRCGS Global Standard for Packaging Materials and industry best practices so ensuring that products always meet customer and legal requirements in the country of manufacture and of use where known.

It is company policy to follow safe working practices and procedures developed through effective hazard assessment, training and experience. In order to achieve these aims, a robust Hazard Analysis Risk Assessment (HARA) System has been introduced following a full hazard analysis of all operations. All instructions and control mechanisms within Hazard Analysis Risk Assessment Plans are designed to control any risk to product safety.

To ensure success of this policy Senior Management are directly responsible for product safety and quality by ensuring adequate; organisation and support, equipment and facilities, training and education of all employees, reviewing and auditing performance, and driving continuous improvement. Detailed organisational arrangements and product quality and safety responsibilities for all levels of management are contained in the quality and safety manual.

Achievement of this policy involves all staff being individually responsible for the quality of their work, resulting in a continual improvement culture and working environment for all. All employees are provided with the safety training necessary to enable them to perform their tasks and are responsible for ensuring that they do so in a safe hygienic manner so that the safety of the product they handle is not put at risk. All employees are required to co-operate with any authorised person to ensure that statutory and regulatory obligations are properly complied with.

Document Reference Product Safety & Quality Policy PSM 1.1.1
Revision 0 28th October 2024
Owned by: General Manager
Authorised by: Chief Executive



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Product Safety & Quality Objectives

a) To maintain a standard of manufacturing that complies with the BRCGS Global Standard for Packaging Materials.
b) To ensure that all food packaging is produced, stored, handled and transported in accordance with relevant customer and legislative requirements.
c) To ensure that all premises used for the preparation of food packaging are registered with the appropriate Local Authority as appropriate.
d) To ensure that all risks associated with food packaging provision are reduced to a tolerable level.
e) To ensure that all food packaging handlers have received basic food hygiene training.
f) To ensure at all times that there is an authorised release of products only when they have been confirmed as complying with agreed specifications.
g) To ensure at all times that product released into the market place complies with relevant customer, statutory and regulatory requirements.
h) To endeavour, at all times, to maximize customer satisfaction and reduce complaint levels by 10% year on year.
i) To pro-actively promote and encourage a culture of continuous improvement within the company by measuring performance and taking action meet the following criteria:

- > 98% food packaging safety audit score
- 100% investigation of incidences of ill health or injury.
- < 1% downgraded product
- > 99.9% compliance with microbiological criteria
- No major GMP non-conformances

Chief Executive .....

Date .....

Objectives are regularly monitored and reviewed annually as a minimum. The results of monitoring are reported to the site's senior management.

Document Reference Product Safety and Quality Objectives PSM 1.1.3
Revision 0 28th October 2024
Owned by: General Manager
Authorised by: Chief Executive

Senior Management Define the Scope of the Packaging Safety and Quality Management System:

The scope of the Packaging Safety and Quality Management System includes all product categories, processes and activities conducted on site. These requirements are aligned with the policies and objectives of the site and include those of the following standards:

Quality - ISO 9001:2015
Safety - BRCGS Global Standard for Packaging Materials Issue 7

The scope of the Packaging Safety and Quality Management System includes all customer, statutory and regulatory documents applicable to the business:

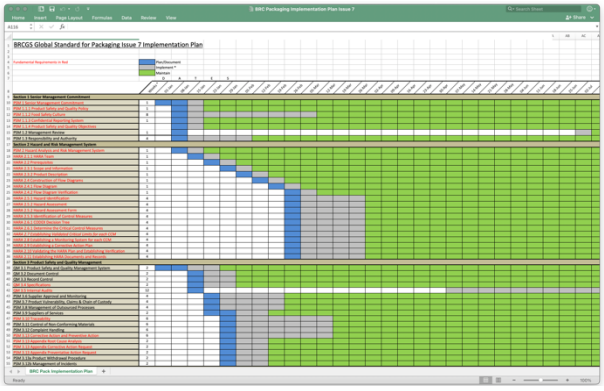
- Food Packaging Regulations
- National/International Standards
- Customer Codes of Practice

The company has a system in place through the Industry Federation to ensure that it is kept informed of all relevant legislation, food packaging safety issues, legislative scientific and technical developments and Industry Codes of Practice applicable in the country of production and, where known, the country where the product will be sold. This information is used for reference and Hazard Analysis.

Where products or services are outsourced the organisation assumes full control of this process.

Senior Management Establish the Project Plan

Senior Management can adapt/use the template supplied with the system to establish a Project Plan.



Senior Management provide adequate support to establish the FSMS

Senior management establish and provide adequate support to establish the Packaging Safety and Quality Management System including the resource required to complete the implementation plan, establish, implement and maintain the Packaging Safety and Quality Management System, conduct Internal Audits and Monitor & Measure.

Action (vi)	Senior management provide adequate support to establish the Packaging Safety and Quality Management System	
	Resource requirement	Details
	HARA Team Leader	
	HARA Team	
	Packaging Safety and Quality Management System Steering Group	
	Trainers	
	Internal Auditors	

Key Personnel and Nominated Deputies

Job Title	Job Holder	Nominated Deputy
Emergency Response Coordinator		
HARA/HACCP Team Leader		
Management Representative		
General Manager		
Operations Manager		
Production Manager		
Warehouse Manager		
Maintenance Manager		
Factory Safety Manager		
Human Resource Manager		
Quality Manager		
Production Supervisor		
Packing Manager		
Planning Manager		
Goods Receipt Manager		
Design and Development Manager		
Planning Manager		
Customer Service Manager		
Laboratory Manager		
Distribution Manager		
Project Manager		

Senior Management Establish a Hazard Analysis and Risk Assessment (HARA) Team

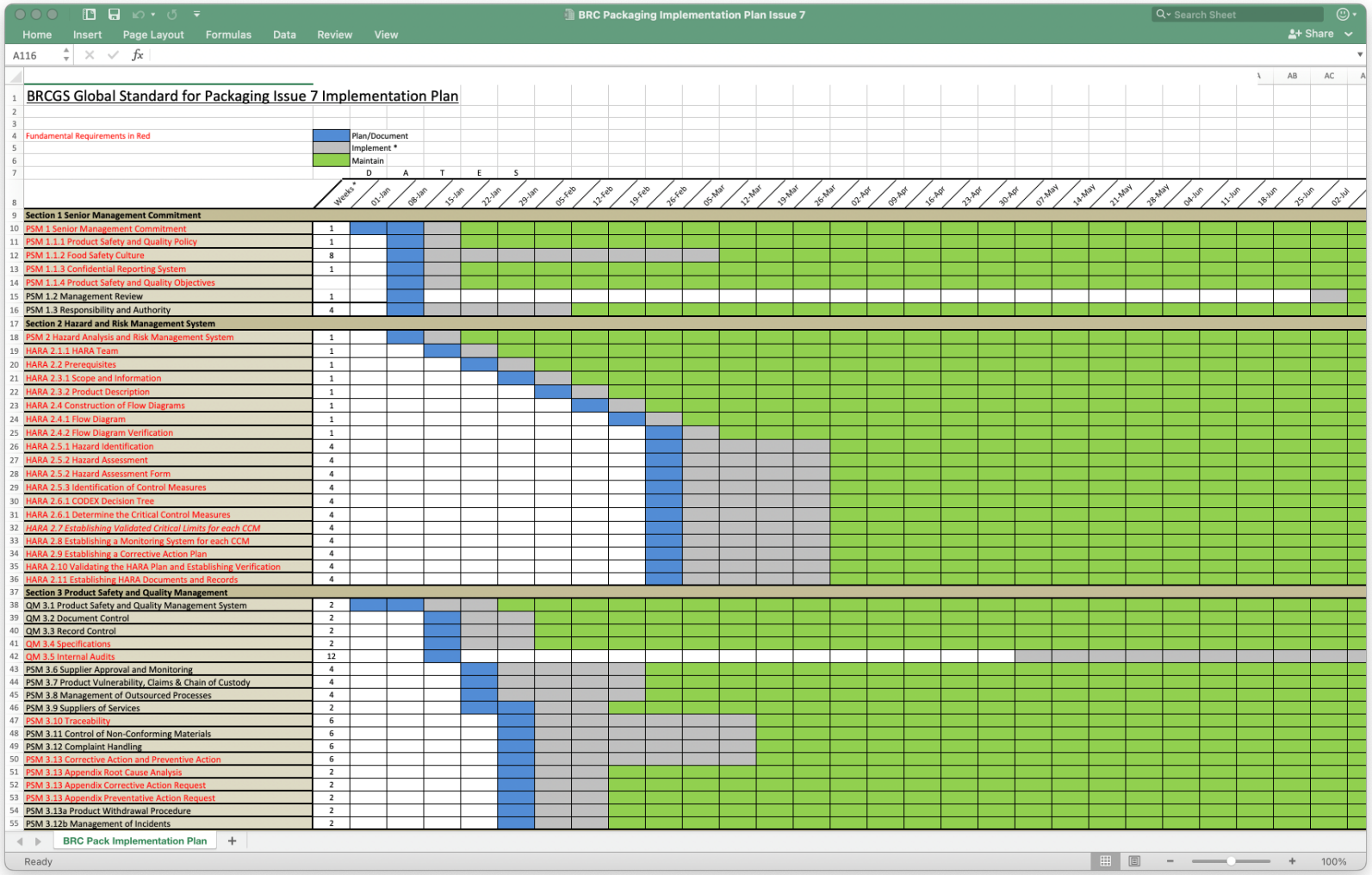
Hazard Analysis and Risk Assessment (HARA) Team			
HARA Team	**Name**	**Position**	**Qualification**

Senior Management Establish Product Withdrawal/Incident Management/Product Recall Team(s)

Product Withdrawal/Incident Management/Product Recall Team(s)			
Crisis	**Name**	**Crisis Coordinator**	**Contact Details**
Fire or Site evacuation		Health and Safety Manager	
Utility Supply failure		Maintenance Manager	
IT systems failure		Operations Manager	
Water Supply Contamination		Quality Manager	
Breaches of security		General Manager	
Distribution Failure		Distribution Manager	
Bomb Threat or similar		General Manager	
Bioterrorism		Chief Executive	
Extortion or Sabotage		General Manager	
Product quality or safety		Quality Manager	

BRC Packaging Management System Implementation Workbook

Senior Management should have directed the Packaging Safety and Quality Management System Implementation Steering Group as to the requirements and an overview of the Implementation Plan. The Steering Group now take over and are responsible for the Implementation Plans.



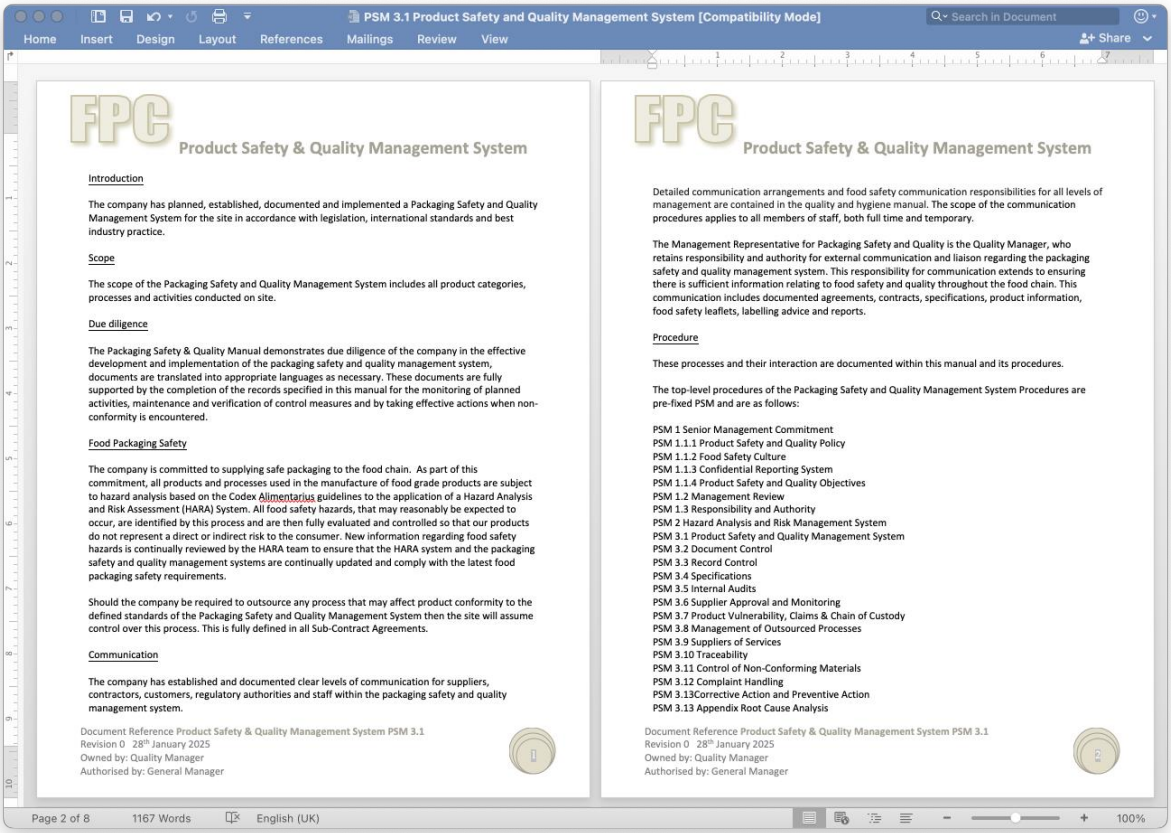
Step Four: Packaging Safety and Quality Management System

Our Packaging Safety and Quality Management System contains a comprehensive BRC compliant documentation package. In this bundle of certification tools, you will find:

- ✓ Packaging Safety Quality Manual containing a set comprehensive procedures and an extensive range of record templates.
- ✓ HARA manual including essential HACCP documents.
- ✓ Laboratory manual including sample procedures and records.

At this stage you can choose to implement all the procedures supplied or pick out those where your system is deficient.

The Packaging Safety Quality Manual contains comprehensive top-level procedures templates that form the foundations of your Packaging Safety and Quality Management System, so you don't have to spend 1,000's of hours writing compliant procedures:



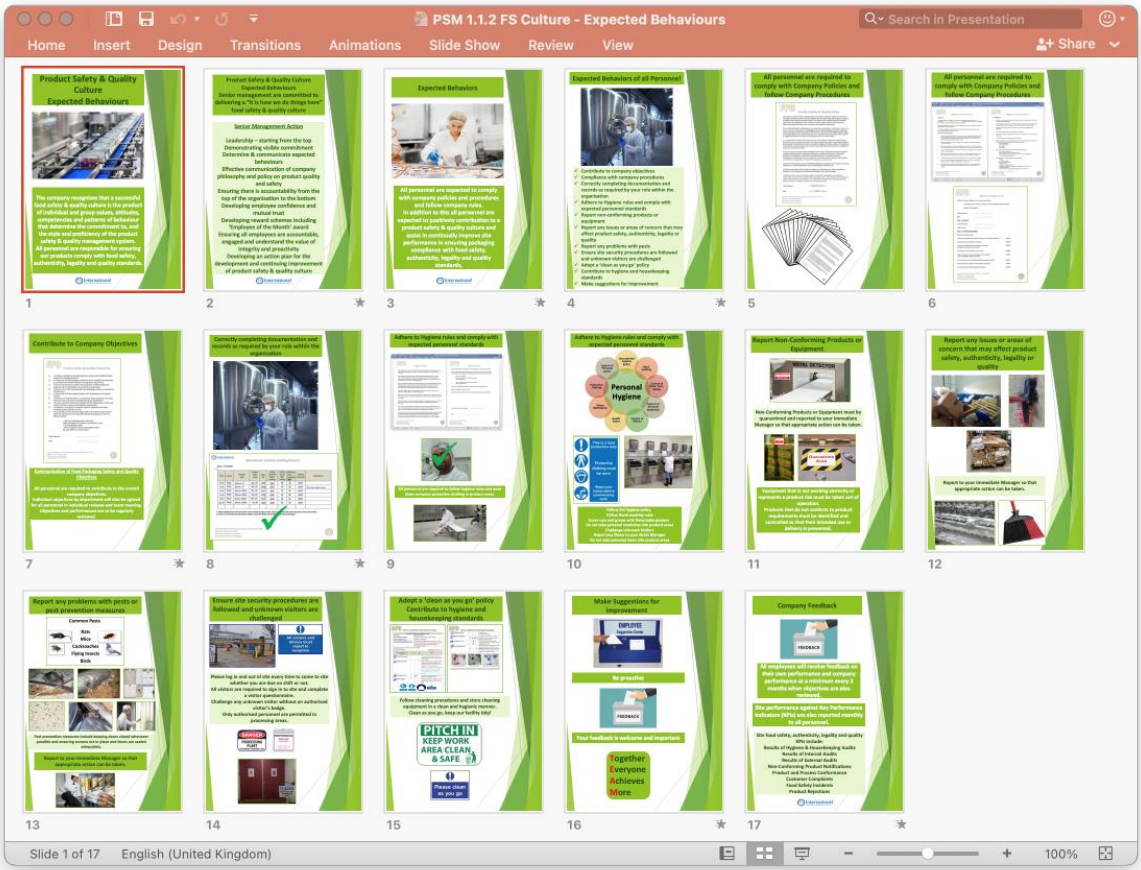
Packaging Safety and Quality Management System Document Implementation

Packaging Safety and Quality Management System Implementation Tasks can be completed by the Team using the Product Safety and Quality Management System Procedure templates:

The top-level procedures of the Packaging Safety and Quality Management System are as follows:

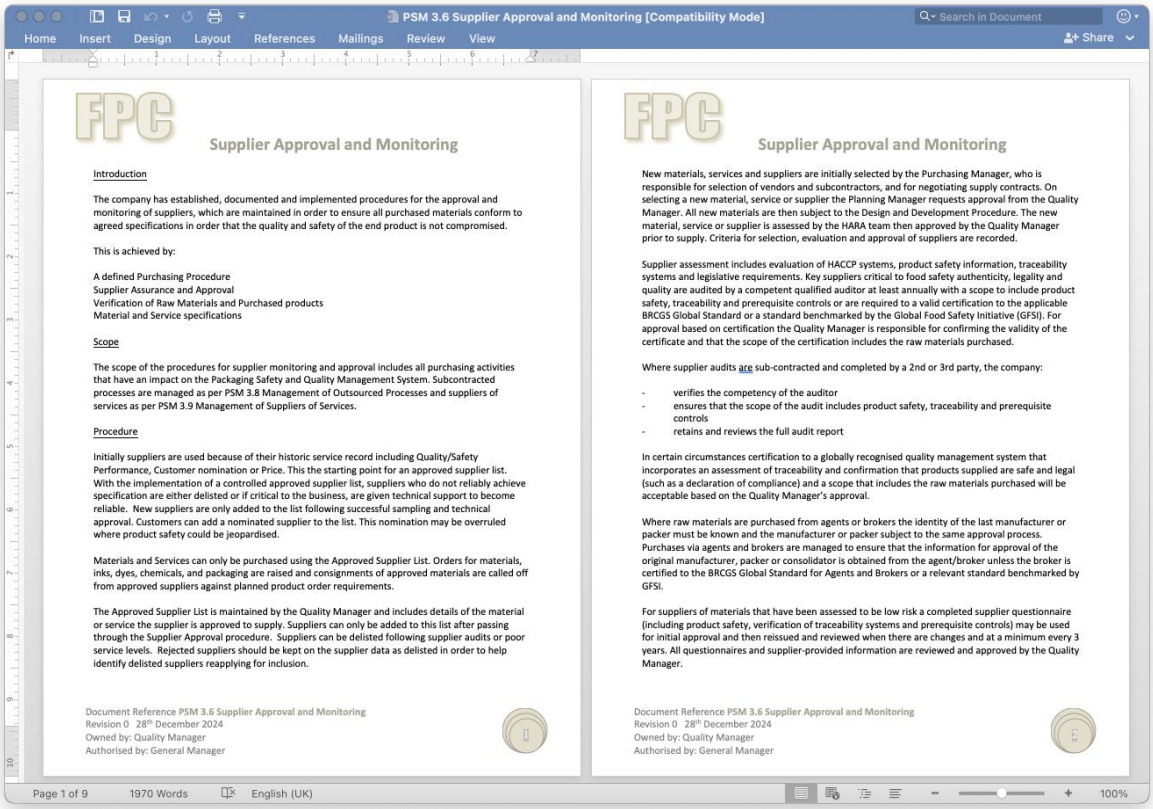
Section 1 Senior Management Commitment

PSM 1 Senior Management Commitment
PSM 1.1.1 Product Safety and Quality Policy
PSM 1.1.2 Food Safety Culture
PSM 1.1.3 Confidential Reporting System
PSM 1.1.4 Product Safety and Quality Objectives
PSM 1.2 Management Review
PSM 1.3 Responsibility and Authority



Section 3 Product Safety and Quality Management

PSM 3.1 Product Safety and Quality Management System
PSM 3.2 Document Control
PSM 3.3 Record Control
PSM 3.4 Specifications
PSM 3.5 Internal Audits
PSM 3.6 Supplier Approval and Monitoring
PSM 3.7 Product Vulnerability, Claims & Chain of Custody
PSM 3.8 Management of Outsourced Processes
PSM 3.9 Suppliers of Services
PSM 3.10 Traceability
PSM 3.11 Control of Non-Conforming Materials
PSM 3.12 Complaint Handling
PSM 3.13Corrective Action and Preventive Action
PSM 3.13 Appendix Root Cause Analysis
PSM 3.13 Appendix Corrective Action Request
PSM 3.13 Appendix Preventative Action Request
PSM 3.13a Product Withdrawal Procedure
PSM 3.12b Management of Incidents



PSM 3.6 Supplier Approval and Monitoring [Compatibility Mode]

Supplier Approval and Monitoring

Introduction

The company has established, documented and implemented procedures for the approval and monitoring of suppliers, which are maintained in order to ensure all purchased materials conform to agreed specifications in order that the quality and safety of the end product is not compromised.

This is achieved by:

A defined Purchasing Procedure
Supplier Assurance and Approval
Verification of Raw Materials and Purchased products
Material and Service specifications

Scope

The scope of the procedures for supplier monitoring and approval includes all purchasing activities that have an impact on the Packaging Safety and Quality Management System. Subcontracted processes are managed as per PSM 3.8 Management of Outsourced Processes and suppliers of services as per PSM 3.9 Management of Suppliers of Services.

Procedure

Initially suppliers are used because of their historic service record including Quality/Safety Performance, Customer nomination or Price. This the starting point for an approved supplier list. With the implementation of a controlled approved supplier list, suppliers who do not reliably achieve specification are either delisted or if critical to the business, are given technical support to become reliable. New suppliers are only added to the list following successful sampling and technical approval. Customers can add a nominated supplier to the list. This nomination may be overruled where product safety could be jeopardised.

Materials and Services can only be purchased using the Approved Supplier List. Orders for materials, inks, dyes, chemicals, and packaging are raised and consignments of approved materials are called off from approved suppliers against planned product order requirements.

The Approved Supplier List is maintained by the Quality Manager and includes details of the material or service the supplier is approved to supply. Suppliers can only be added to this list after passing through the Supplier Approval procedure. Suppliers can be delisted following supplier audits or poor service levels. Rejected suppliers should be kept on the supplier data as delisted in order to help identify delisted suppliers reapplying for inclusion.

Document Reference PSM 3.6 Supplier Approval and Monitoring
Revision 0 28th December 2024
Owned by: Quality Manager
Authorised by: General Manager

Supplier Approval and Monitoring

New materials, services and suppliers are initially selected by the Purchasing Manager, who is responsible for selection of vendors and subcontractors, and for negotiating supply contracts. On selecting a new material, service or supplier the Planning Manager requests approval from the Quality Manager. All new materials are then subject to the Design and Development Procedure. The new material, service or supplier is assessed by the HARA team then approved by the Quality Manager prior to supply. Criteria for selection, evaluation and approval of suppliers are recorded.

Supplier assessment includes evaluation of HACCP systems, product safety information, traceability systems and legislative requirements. Key suppliers critical to food safety authenticity, legality and quality are audited by a competent qualified auditor at least annually with a scope to include product safety, traceability and prerequisite controls or are required to a valid certification to the applicable BRCGS Global Standard or a standard benchmarked by the Global Food Safety Initiative (GFSI). For approval based on certification the Quality Manager is responsible for confirming the validity of the certificate and that the scope of the certification includes the raw materials purchased.

Where supplier audits are sub-contracted and completed by a 2nd or 3rd party, the company:

- verifies the competency of the auditor
- ensures that the scope of the audit includes product safety, traceability and prerequisite controls
- retains and reviews the full audit report

In certain circumstances certification to a globally recognised quality management system that incorporates an assessment of traceability and confirmation that products supplied are safe and legal (such as a declaration of compliance) and a scope that includes the raw materials purchased will be acceptable based on the Quality Manager's approval.

Where raw materials are purchased from agents or brokers the identity of the last manufacturer or packer must be known and the manufacturer or packer subject to the same approval process. Purchases via agents and brokers are managed to ensure that the information for approval of the original manufacturer, packer or consolidator is obtained from the agent/broker unless the broker is certified to the BRCGS Global Standard for Agents and Brokers or a relevant standard benchmarked by GFSI.

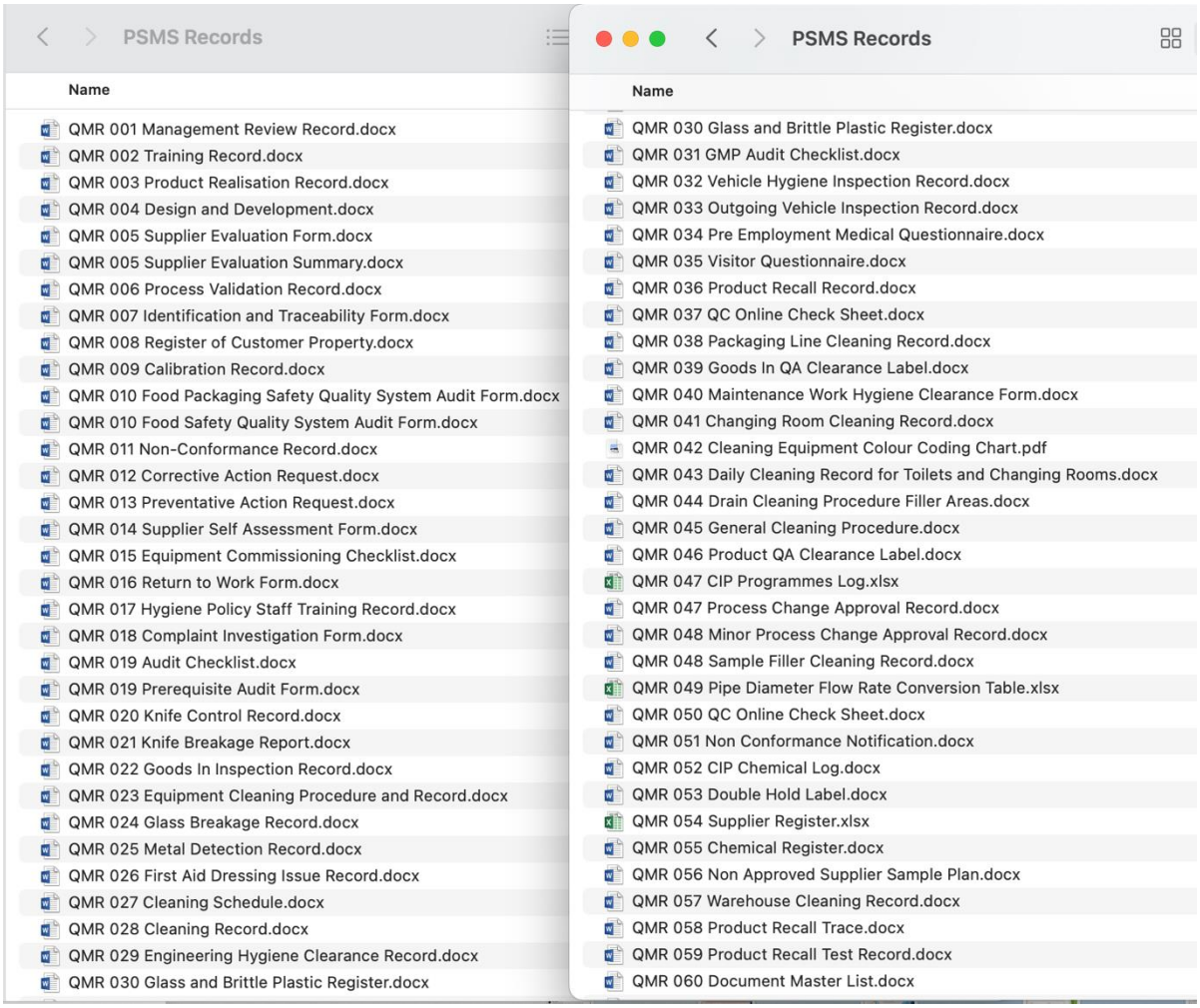
For suppliers of materials that have been assessed to be low risk a completed supplier questionnaire (including product safety, verification of traceability systems and prerequisite controls) may be used for initial approval and then reissued and reviewed when there are changes and at a minimum every 3 years. All questionnaires and supplier-provided information are reviewed and approved by the Quality Manager.

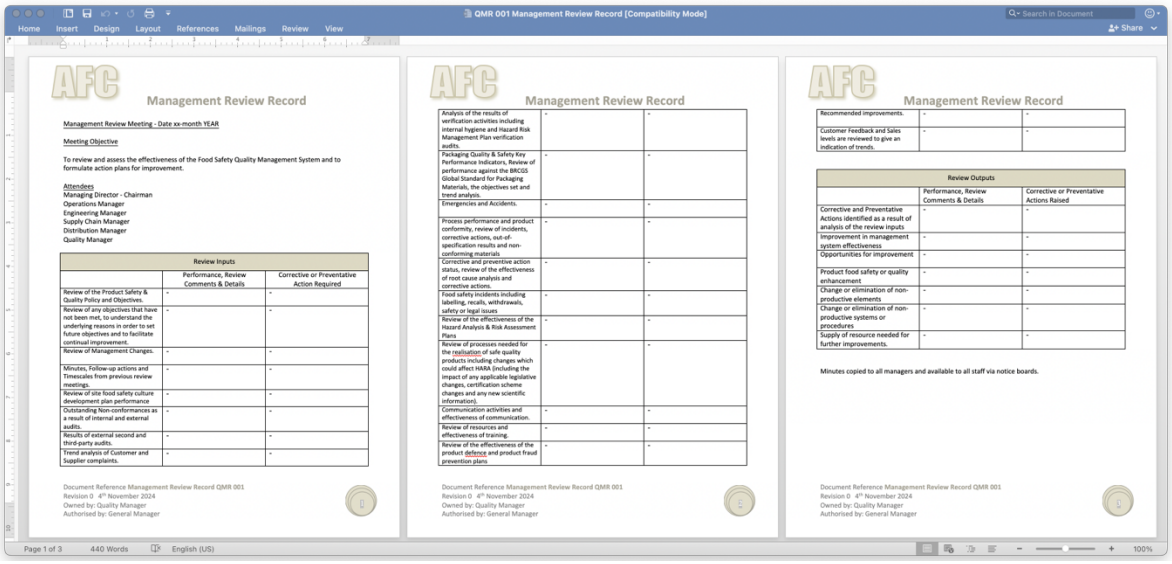
Document Reference PSM 3.6 Supplier Approval and Monitoring
Revision 0 28th December 2024
Owned by: Quality Manager
Authorised by: General Manager

Page 1 of 9 1970 Words English (UK) 100%

Packaging Safety and Quality Management System Record Templates

A comprehensive range of easy to use Packaging Safety and Quality Management System record templates are provided which can be used or adapted as required.





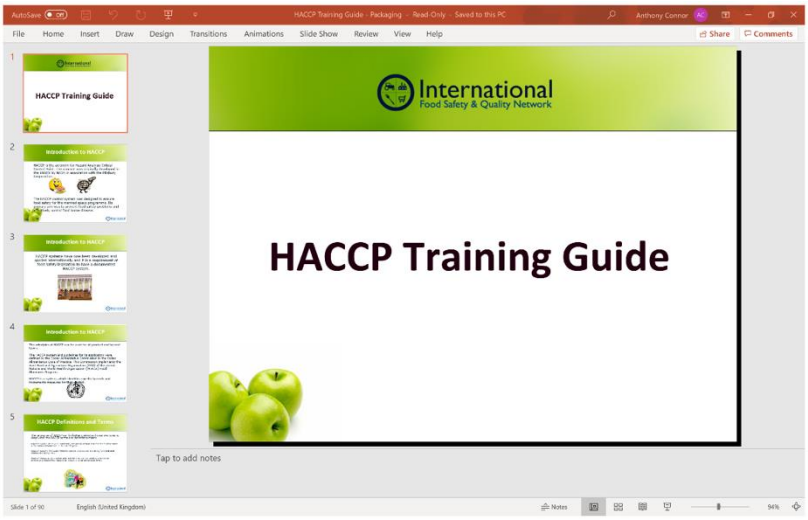
Step Five: HARA/HACCP Implementation

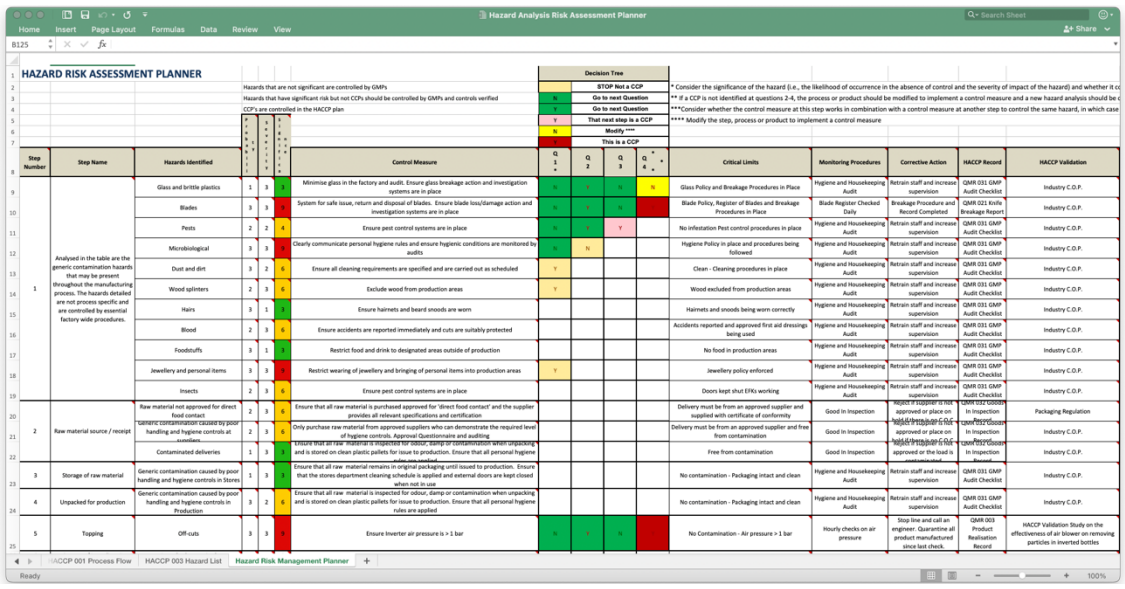
HARA Implementation Tasks

HARA Implementation Tasks are to be completed by the HARA Team using the guidelines included in this HARA Implementation Section. We will go through the task by section as the requirements are listed in Section 2 of the BRC Standard

HACCP Training

A PowerPoint HACCP training presentation is supplied to train your HARA team in the preliminary steps to a Hazard analysis, the principles of HACCP and Instructions in implementing your HACCP system. There is also a HARA Planning Tool.

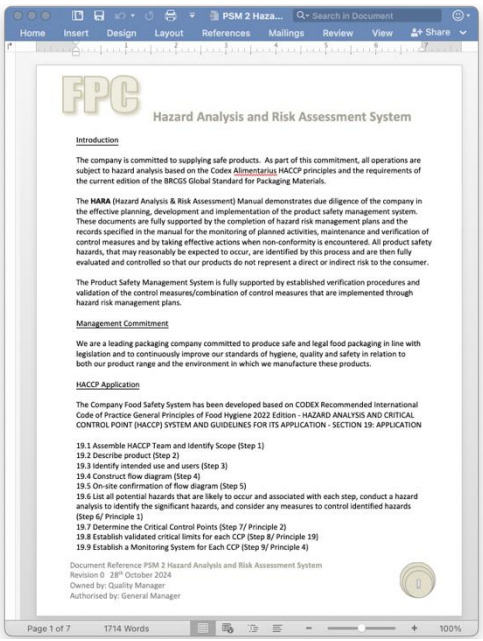




HARA Manual

The HARA System is implemented by following Packaging Safety and Quality Management System Procedure PSM 2 Hazard and Risk Management System and using the following documents which are found in the HARA Manual:

Hazard Analysis Risk Assessment Planner & Instructions
HARA 2.1.1 HARA Team
HARA 2.2 Prerequisites
HARA 2.3.1 Scope and Information
HARA 2.3.2 Product Description
HARA 2.4 Construction of Flow Diagrams
HARA 2.4.1 Flow Diagram
HARA 2.4.2 Flow Diagram Verification
HARA 2.5.1 Hazard Identification
HARA 2.5.2 Hazard Assessment
HARA 2.5.2 Hazard Assessment Form
HARA 2.5.3 Identification of Control Measures
HARA 2.6.1 CODEX Decision Tree
HARA 2.6.1 Determine the Critical Control Measures
HARA 2.7 Establishing Validated Critical Limits for each CCM
HARA 2.8 Establishing a Monitoring System for each CCM
HARA 2.9 Establishing a Corrective Action Plan
HARA 2.10 Validating the HARA Plan and Establishing Verification Procedures
HARA 2.11 Establishing HARA Documents and Records



HARA Implementation Guide Section 2.1.1 HARA Team

A core multidisciplinary team should be utilised within the company to develop the Packaging Safety and Quality Management System. This core team should be supplemented by other staff when specific areas or products are being analysed. The team need to have knowledge and experience of HACCP, Products, the Process, the Equipment, and Hazards and in developing and implementing a packaging safety management system. The HARA Team Leader needs to be able to demonstrate competence in the understanding of HACCP principles and their application. Key personnel identified as HACCP team members should be HACCP trained and have appropriate experience, all of which should be documented on the HACCP teams training records. Expert external assistance may be used as an aid, but management of the system should remain the responsibility of the site.

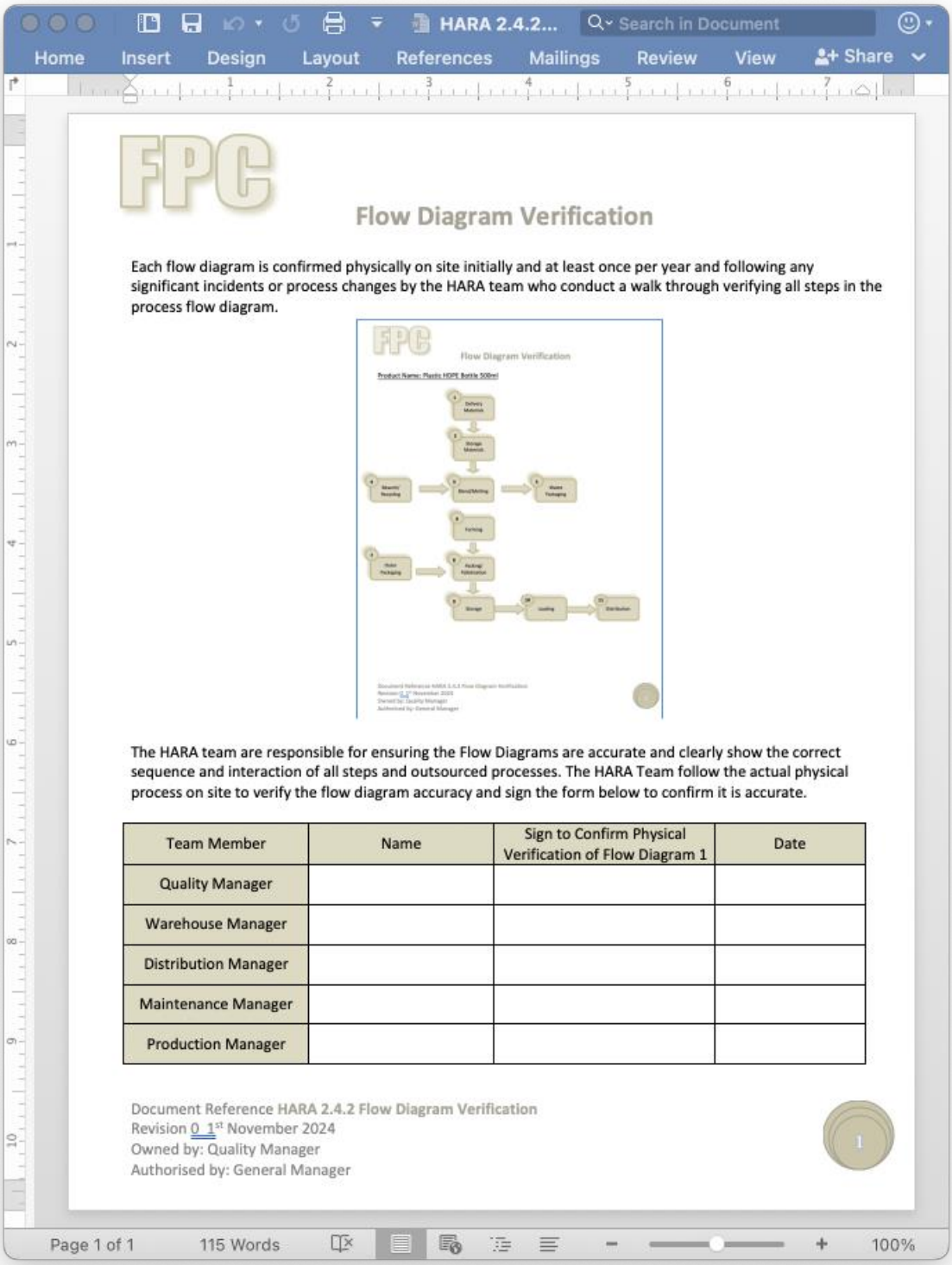
A typical HARA Team may include:

Team Member	HACCP Training
Quality Manager	Advanced
Laboratory Manager	Intermediate
Warehouse Manager	Intermediate
Engineering Manager	Intermediate
Production Manager	Intermediate

HARA Team			
HARA Team	**Name**	**Position**	**Qualification**

HARA 2.4.2 Flow Diagram Verification

The HARA team need to verify the edited HARA 2.4.1 Flow Diagrams.



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Flow Diagram Verification

Each flow diagram is confirmed physically on site initially and at least once per year and following any significant incidents or process changes by the HARA team who conduct a walk through verifying all steps in the process flow diagram.

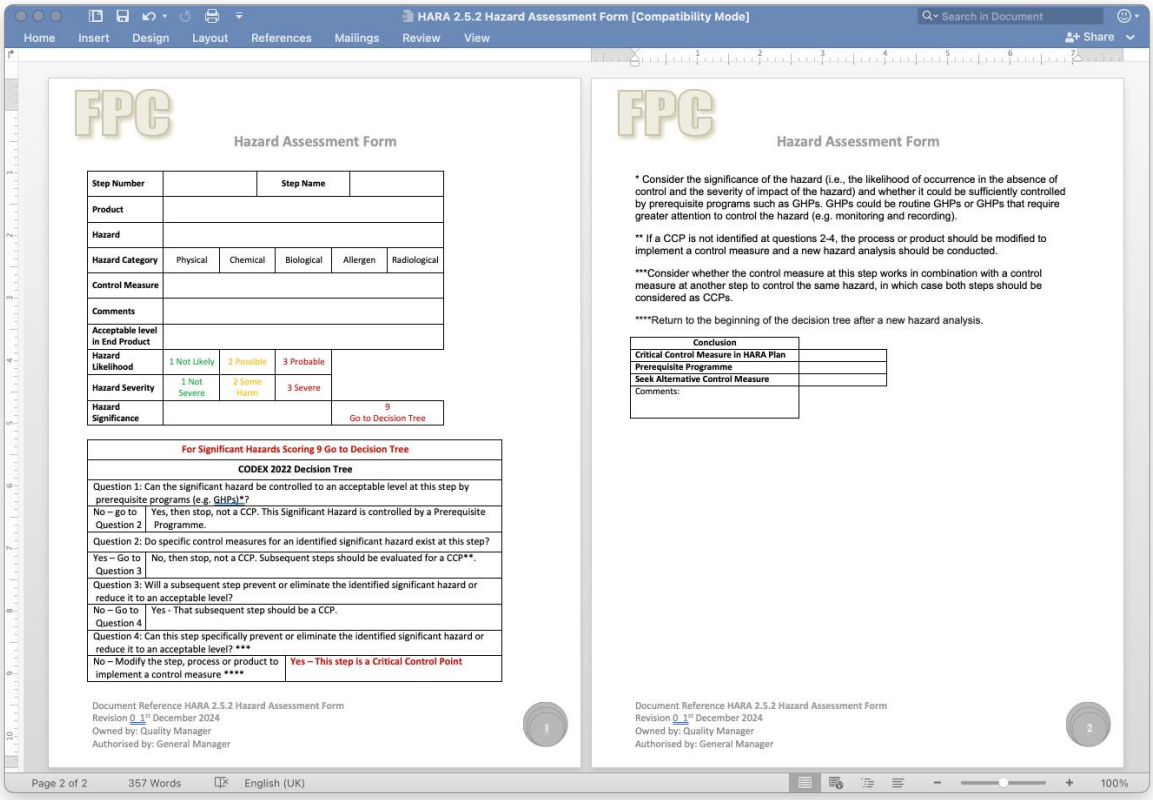
The HARA team are responsible for ensuring the Flow Diagrams are accurate and clearly show the correct sequence and interaction of all steps and outsourced processes. The HARA Team follow the actual physical process on site to verify the flow diagram accuracy and sign the form below to confirm it is accurate.

Team Member	Name	Sign to Confirm Physical Verification of Flow Diagram 1	Date
Quality Manager			
Warehouse Manager			
Distribution Manager			
Maintenance Manager			
Production Manager			

Document Reference HARA 2.4.2 Flow Diagram Verification
Revision 0_1st November 2024
Owned by: Quality Manager
Authorised by: General Manager

HARA 2.5.2 Hazard Assessment Form

The HARA team can use HARA 2.5.2 Hazard Assessment Form or the Hazard Risk Assessment Planner for this assessment



HARA 2.5.2 Hazard Assessment Form [Compatibility Mode]

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Hazard Assessment Form

Step Number			Step Name			
Product						
Hazard						
Hazard Category	Physical	Chemical	Biological	Allergen	Radiological	
Control Measure						
Comments						
Acceptable level in End Product						
Hazard Likelihood	1 Not Likely	2 Possible	3 Probable			
Hazard Severity	1 Not Severe	2 Some Harm	3 Severe			
Hazard Significance			9 Go to Decision Tree			

For Significant Hazards Scoring 9 Go to Decision Tree	
CODEX 2022 Decision Tree	
Question 1: Can the significant hazard be controlled to an acceptable level at this step by prerequisite programs (e.g. GHPs)*?	
No – go to Question 2	Yes, then stop, not a CCP. This Significant Hazard is controlled by a Prerequisite Programme.
Question 2: Do specific control measures for an identified significant hazard exist at this step?	
Yes – Go to Question 3	No, then stop, not a CCP. Subsequent steps should be evaluated for a CCP**.
Question 3: Will a subsequent step prevent or eliminate the identified significant hazard or reduce it to an acceptable level?	
No – Go to Question 4	Yes - That subsequent step should be a CCP.
Question 4: Can this step specifically prevent or eliminate the identified significant hazard or reduce it to an acceptable level? ***	
No – Modify the step, process or product to implement a control measure ****	Yes – This step is a Critical Control Point

Document Reference HARA 2.5.2 Hazard Assessment Form
Revision 0_1 1st December 2024
Owned by: Quality Manager
Authorised by: General Manager

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Hazard Assessment Form

* Consider the significance of the hazard (i.e., the likelihood of occurrence in the absence of control and the severity of impact of the hazard) and whether it could be sufficiently controlled by prerequisite programs such as GHPs. GHPs could be routine GHPs or GHPs that require greater attention to control the hazard (e.g. monitoring and recording).

** If a CCP is not identified at questions 2-4, the process or product should be modified to implement a control measure and a new hazard analysis should be conducted.

***Consider whether the control measure at this step works in combination with a control measure at another step to control the same hazard, in which case both steps should be considered as CCPs.

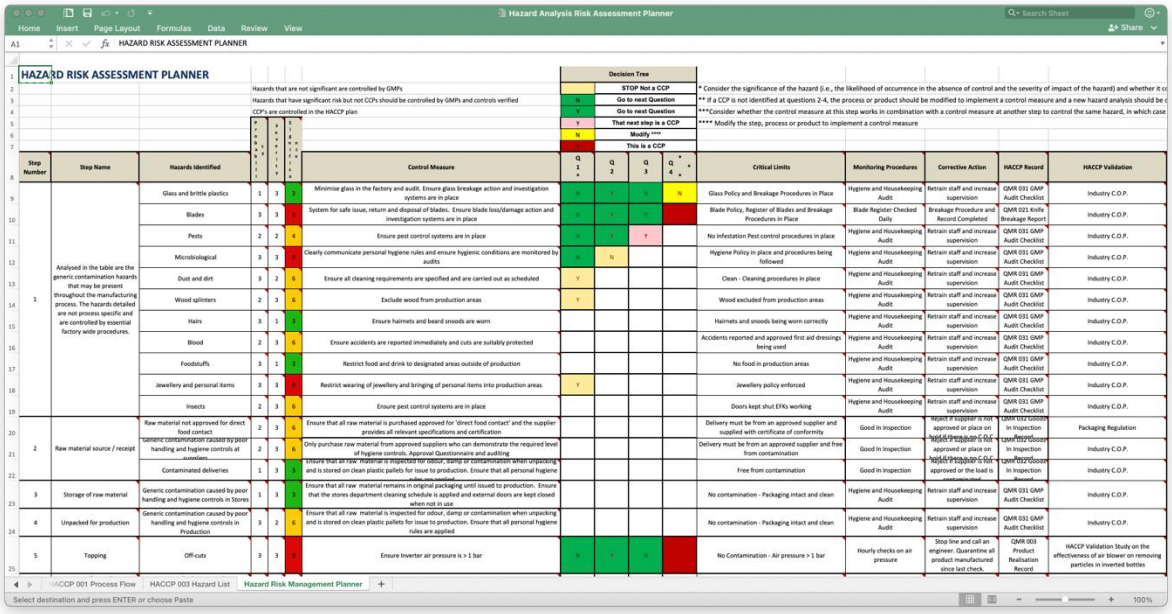
****Return to the beginning of the decision tree after a new hazard analysis.

Conclusion	
Critical Control Measure in HARA Plan	
Prerequisite Programme	
Seek Alternative Control Measure	
Comments:	

Document Reference HARA 2.5.2 Hazard Assessment Form
Revision 0_1 1st December 2024
Owned by: Quality Manager
Authorised by: General Manager

2

Page 2 of 2 357 Words English (UK) 100%



Hazard Analysis Risk Assessment Planner

HAZARD RISK ASSESSMENT PLANNER

Hazards that are not significant are controlled by GMPs
Hazards that have significant risk but not CCPs should be controlled by GMPs and controls verified
CCP's are controlled in the HACCP plan

Decision Tree	
	STOP Not a CCP
N	Go to next Question
Y	Go to next Question
Y	That next step is a CCP
N	Modify ****
	This is a CCP

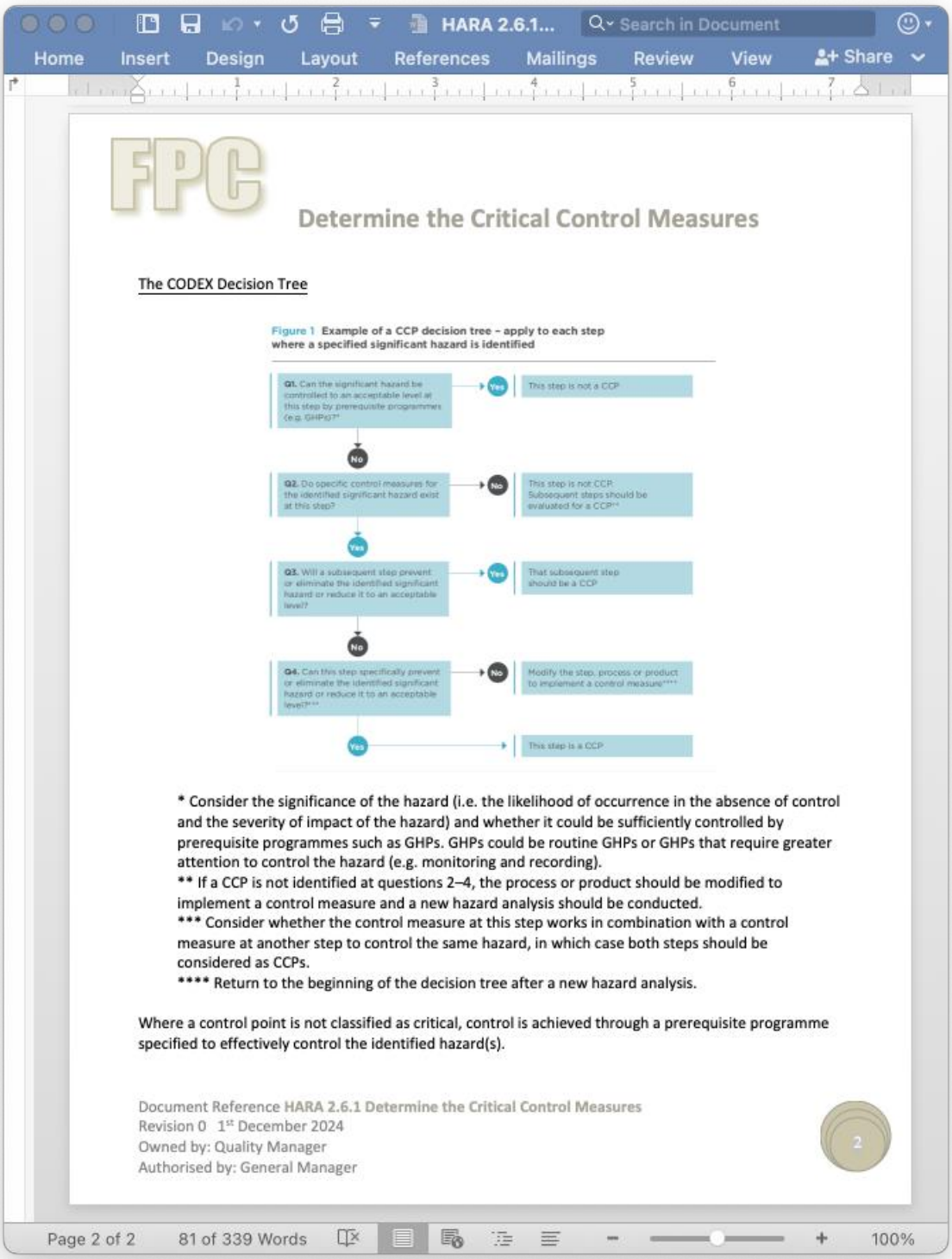
* Consider the significance of the hazard (i.e., the likelihood of occurrence in the absence of control and the severity of impact of the hazard) and whether it co
** If a CCP is not identified at questions 2-4, the process or product should be modified to implement a control measure and a new hazard analysis should be c
***Consider whether the control measure at this step works in combination with a control measure at another step to control the same hazard, in which case
**** Modify the step, process or product to implement a control measure

Step Number	Step Name	Hazards Identified	Probability of occurrence	Severity of Hazard	Significance	Control Measure	Q 1 *	Q 2	Q 3	Q 4 * *	Critical Limits	Monitoring Procedures	Corrective Action	HACCP Record	HACCP Validation
1	Analysed in the table are the generic contamination hazards that may be present throughout the manufacturing process. The hazards detailed are not process specific and are controlled by essential factory wide procedures.	Glass and brittle plastics	1	3	3	Minimise glass in the factory and audit. Ensure glass breakage action and investigation systems are in place	N	Y	N	N	Glass Policy and Breakage Procedures in Place	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
		Blades	3	3	9	System for safe issue, return and disposal of blades. Ensure blade loss/damage action and investigation systems are in place	N	Y	N		Blade Policy, Register of Blades and Breakage Procedures in Place	Blade Register Checked Daily	Breakage Procedure and Record Completed	QMR 021 Knife Breakage Report	Industry C.O.P.
		Pests	2	2	4	Ensure pest control systems are in place	N	Y	Y		No infestation Pest control procedures in place	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
		Microbiological	3	3	9	Clearly communicate personal hygiene rules and ensure hygienic conditions are monitored by audits	N	N			Hygiene Policy in place and procedures being followed	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
		Dust and dirt	3	2	6	Ensure all cleaning requirements are specified and are carried out as scheduled	Y				Clean - Cleaning procedures in place	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
		Wood splinters	2	3	6	Exclude wood from production areas	Y				Wood excluded from production areas	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
		Hairs	3	1	3	Ensure hairnets and beard snoods are worn					Hairnets and snoods being worn correctly	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
		Blood	2	3	6	Ensure accidents are reported immediately and cuts are suitably protected					Accidents reported and approved first aid dressings being used	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
		Foodstuffs	3	1	3	Restrict food and drink to designated areas outside of production					No food in production areas	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
		Jewellery and personal items	3	3	9	Restrict wearing of jewellery and bringing of personal items into production areas	Y				Jewellery policy enforced	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
		Insects	2	3	6	Ensure pest control systems are in place					Doors kept shut EFKs working	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
2	Raw material source / receipt	Raw material not approved for direct food contact	2	3	6	Ensure that all raw material is purchased approved for 'direct food contact' and the supplier provides all relevant specifications and certification					Delivery must be from an approved supplier and supplied with certificate of conformity	Good In Inspection	Reject if supplier is not approved or place on hold if there is no C.O.C	QMR 032 Goods In Inspection Record	Packaging Regulation
		Generic contamination caused by poor handling and hygiene controls at supplier	2	3	6	Only purchase raw material from approved suppliers who can demonstrate the required level of hygiene controls. Approval Questionnaire and auditing					Delivery must be from an approved supplier and free from contamination	Good In Inspection	Reject if supplier is not approved or place on hold if there is no C.O.C	QMR 032 Goods In Inspection Record	Industry C.O.P.
		Contaminated deliveries	1	3	3	Ensure that all raw material is inspected for odour, damp or contamination when unpacking and is stored on clean plastic pallets for issue to production. Ensure that all personal hygiene rules are applied					Free from contamination	Good In Inspection	Reject if supplier is not approved or the load is contaminated	QMR 032 Goods In Inspection Record	Industry C.O.P.
3	Storage of raw material	Generic contamination caused by poor handling and hygiene controls in Stores	1	3	3	Ensure that all raw material remains in original packaging until issued to production. Ensure that the stores department cleaning schedule is applied and external doors are kept closed when not in use					No contamination - Packaging intact and clean	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
4	Unpacked for production	Generic contamination caused by poor handling and hygiene controls in Production	3	2	6	Ensure that all raw material is inspected for odour, damp or contamination when unpacking and is stored on clean plastic pallets for issue to production. Ensure that all personal hygiene rules are applied					No contamination - Packaging intact and clean	Hygiene and Housekeeping Audit	Retrain staff and increase supervision	QMR 031 GMP Audit Checklist	Industry C.O.P.
5	Topping	Off-cuts	3	3	9	Ensure Inverter air pressure is > 1 bar	N	Y	N		No Contamination - Air pressure > 1 bar	Hourly checks on air pressure	Stop line and call an engineer. Quarantine all product manufactured since last check.	QMR 003 Product Realisation Record	HACCP Validation Study on the effectiveness of air blower on removing particles in inverted bottles

HACCP 001 Process Flow | HACCP 903 Hazard List | Hazard Risk Management Planner

Select destination and press ENTER or choose Paste 100%

HARA 2.6.1 CODEX Decision Tree



FPC

Determine the Critical Control Measures

The CODEX Decision Tree

Figure 1 Example of a CCP decision tree – apply to each step where a specified significant hazard is identified

* Consider the significance of the hazard (i.e. the likelihood of occurrence in the absence of control and the severity of impact of the hazard) and whether it could be sufficiently controlled by prerequisite programmes such as GHPs. GHPs could be routine GHPs or GHPs that require greater attention to control the hazard (e.g. monitoring and recording).
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*** Consider whether the control measure at this step works in combination with a control measure at another step to control the same hazard, in which case both steps should be considered as CCPs.
**** Return to the beginning of the decision tree after a new hazard analysis.

Where a control point is not classified as critical, control is achieved through a prerequisite programme specified to effectively control the identified hazard(s).

Document Reference HARA 2.6.1 Determine the Critical Control Measures
Revision 0 1st December 2024
Owned by: Quality Manager
Authorised by: General Manager

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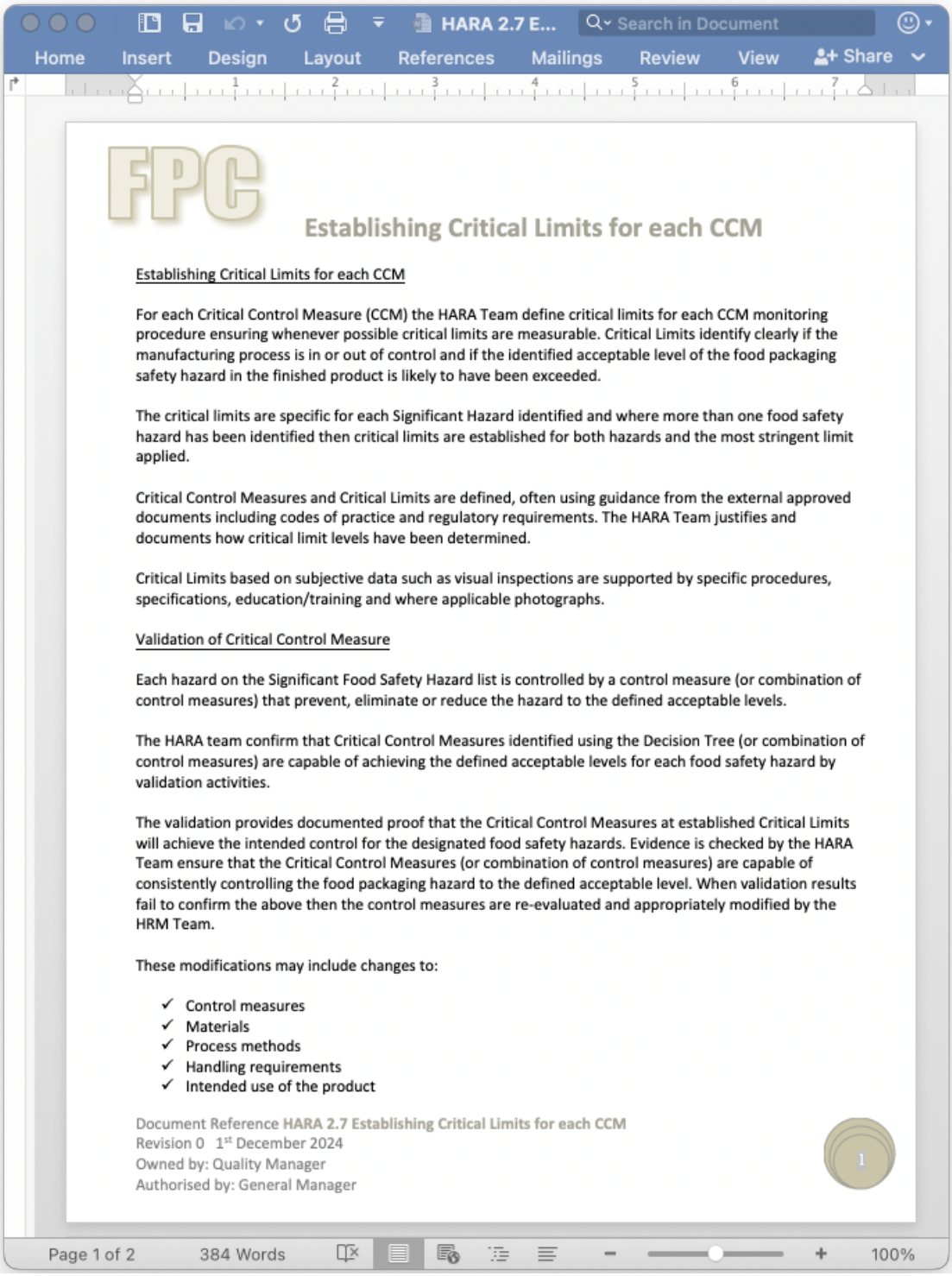
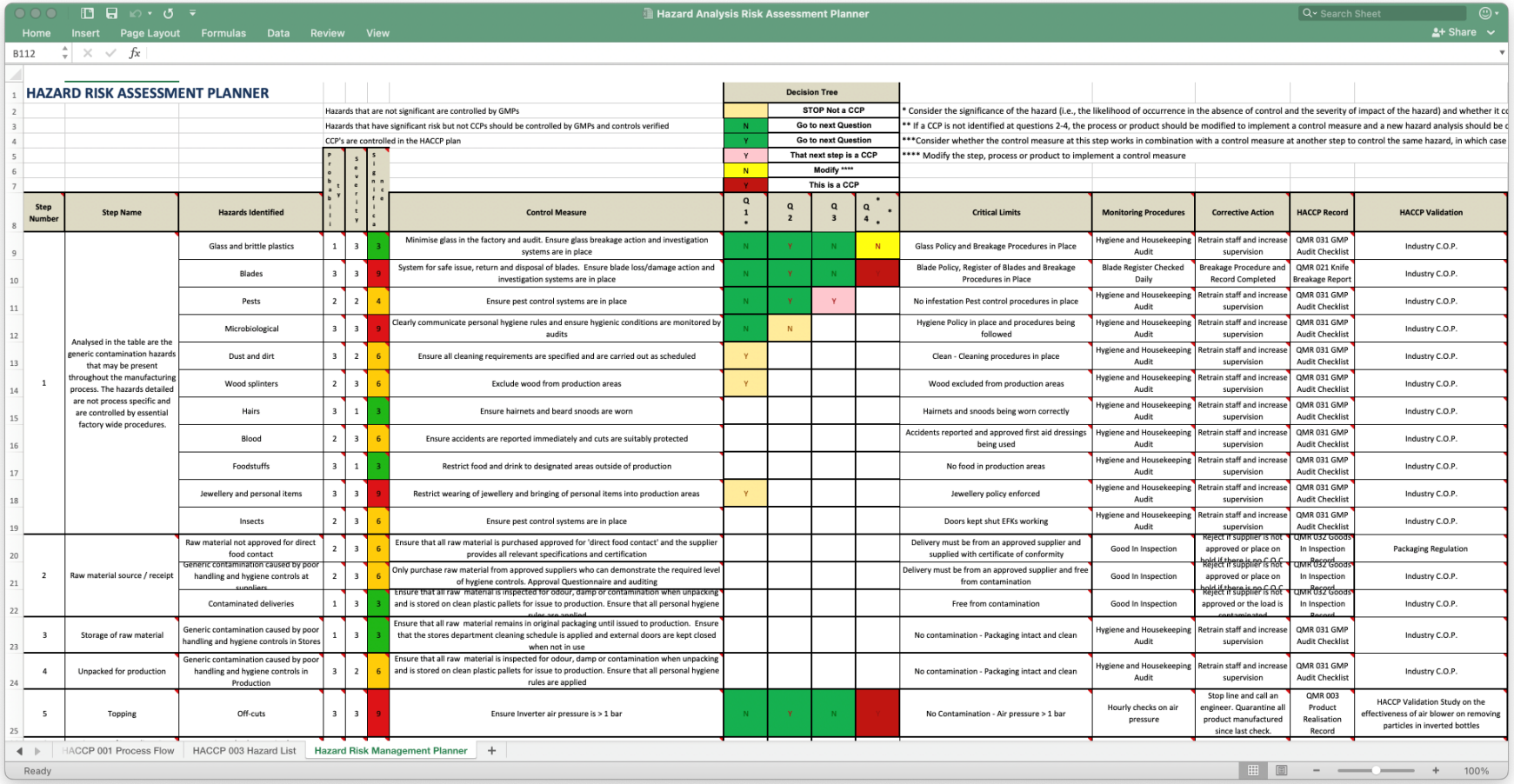
HARA 2.7 Establishing Validated Critical Limits for each CCM

For each Critical Control Measure (CCM) the HARA Team need to define critical limits for each CCM monitoring procedure ensuring whenever possible critical limits are measurable. Critical Limits need to identify clearly if the manufacturing process is in or out of control and if the identified acceptable level of the food packaging safety hazard in the finished product is likely to have been exceeded.



The HARA Team should complete the relevant columns in the Hazard Analysis Risk Management Planner.



Hazard Analysis Risk Assessment Planner

Home Insert Page Layout Formulas Data Review View

B112

HAZARD RISK ASSESSMENT PLANNER

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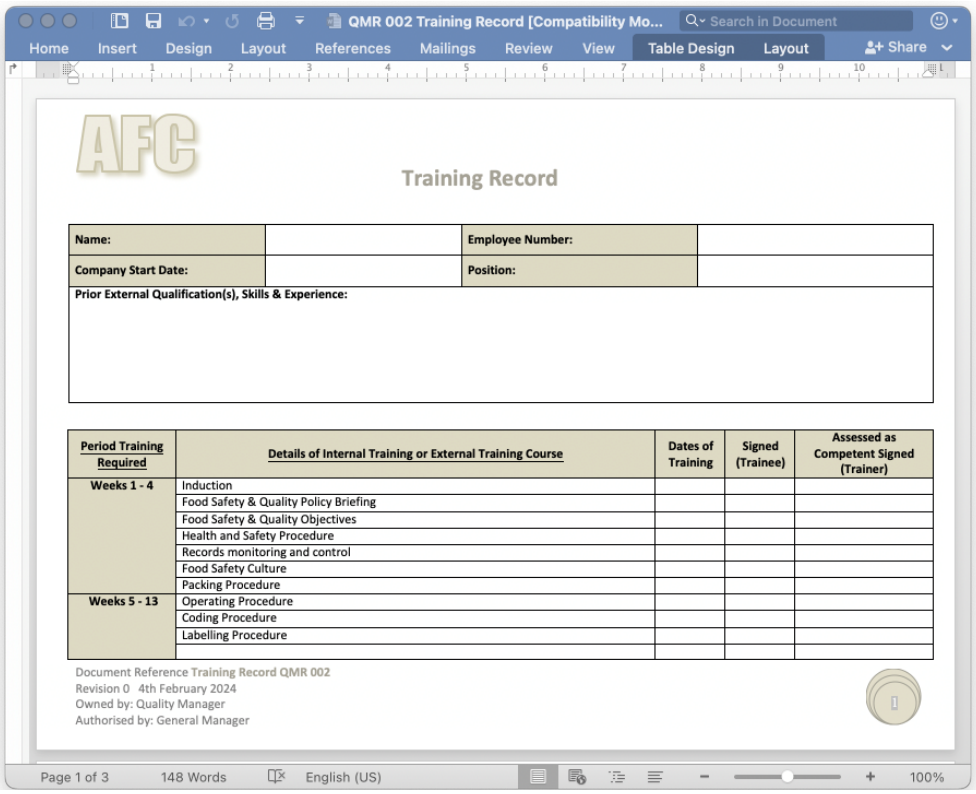
5	Topping	Off-cuts	3	3	9	Ensure Inverter air pressure is > 1 bar	N	Y	N	Y	No Contamination - Air pressure > 1 bar	Hourly checks on air pressure	Stop line and call an engineer. Quarantine all product manufactured since last check.	QMR 003 Product Realisation Record	HACCP Validation Study on the effectiveness of air blower on removing particles in inverted bottles

HACCP 001 Process Flow | HACCP 003 Hazard List | Hazard Risk Management Planner

Ready 100%

There is an option available in Microsoft Word Document HARA Plan Template. For simple operations, it may be easier to use the Word version, for more complex operations the Excel version will probably work better.

QMR 002 Training Record



QMR 002 Training Record [Compatibility Mo...

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Training Record

Name:		Employee Number:	
Company Start Date:		Position:	
Prior External Qualification(s), Skills & Experience:			

Period Training Required	Details of Internal Training or External Training Course	Dates of Training	Signed (Trainee)	Assessed as Competent Signed (Trainer)
Weeks 1 - 4	Induction			
	Food Safety & Quality Policy Briefing			
	Food Safety & Quality Objectives			
	Health and Safety Procedure			
	Records monitoring and control			
	Food Safety Culture			
	Packing Procedure			
Weeks 5 - 13	Operating Procedure			
	Coding Procedure			
	Labelling Procedure			

Document Reference Training Record QMR 002
Revision 0 4th February 2024
Owned by: Quality Manager
Authorised by: General Manager

Page 1 of 3 148 Words English (US) 100%

Basic Training should be given to all staff and also include:

- ✓ Job/Task Performance
- ✓ Company Safety and Quality Policies and Procedures
- ✓ Good Manufacturing Practices
- ✓ Cleaning Procedures
- ✓ Hazards
- ✓ Site Security
- ✓ Product Quality
- ✓ Chemical Control
- ✓ Hazard Communication
- ✓ Blood borne Pathogen
- ✓ Emergency Preparedness/Employee Safety

The HARA Team should receive extra training: HACCP Training Internal and Audit Training (Conducted in Step Seven)

At this stage of the project the Steering Group will be controlling the Project Plan established by Senior Management and ensuring sufficient training resource is being provided to implement the Packaging Safety and Quality Management System and HARA Plans.

Stage 8: Final Steps to BRC Certification

There a few final steps to achieving BRC Certification:

- ✓ Carry out a Senior Management Review
- ✓ Carry out an assessment of your system to make sure that it meets the requirements of the BRCGS Standard for Packaging and Packaging Materials
- ✓ Ensure any areas requiring corrective action are addressed
- ✓ Choose your Certification Body
- ✓ Agree a Contract with a Certification Body
- ✓ On-Site Audit
- ✓ Audit & Corrective Action Review
- ✓ Certification & Issuing of the Audit Report
- ✓ Celebrate!
- ✓ Communicate your success!

The system is supplied with PSM 1.2 Management Review Procedure and QMR 001 Management Review Meeting Minutes which should be used as a template.

Senior Management Review Meeting Notification

Date

Time

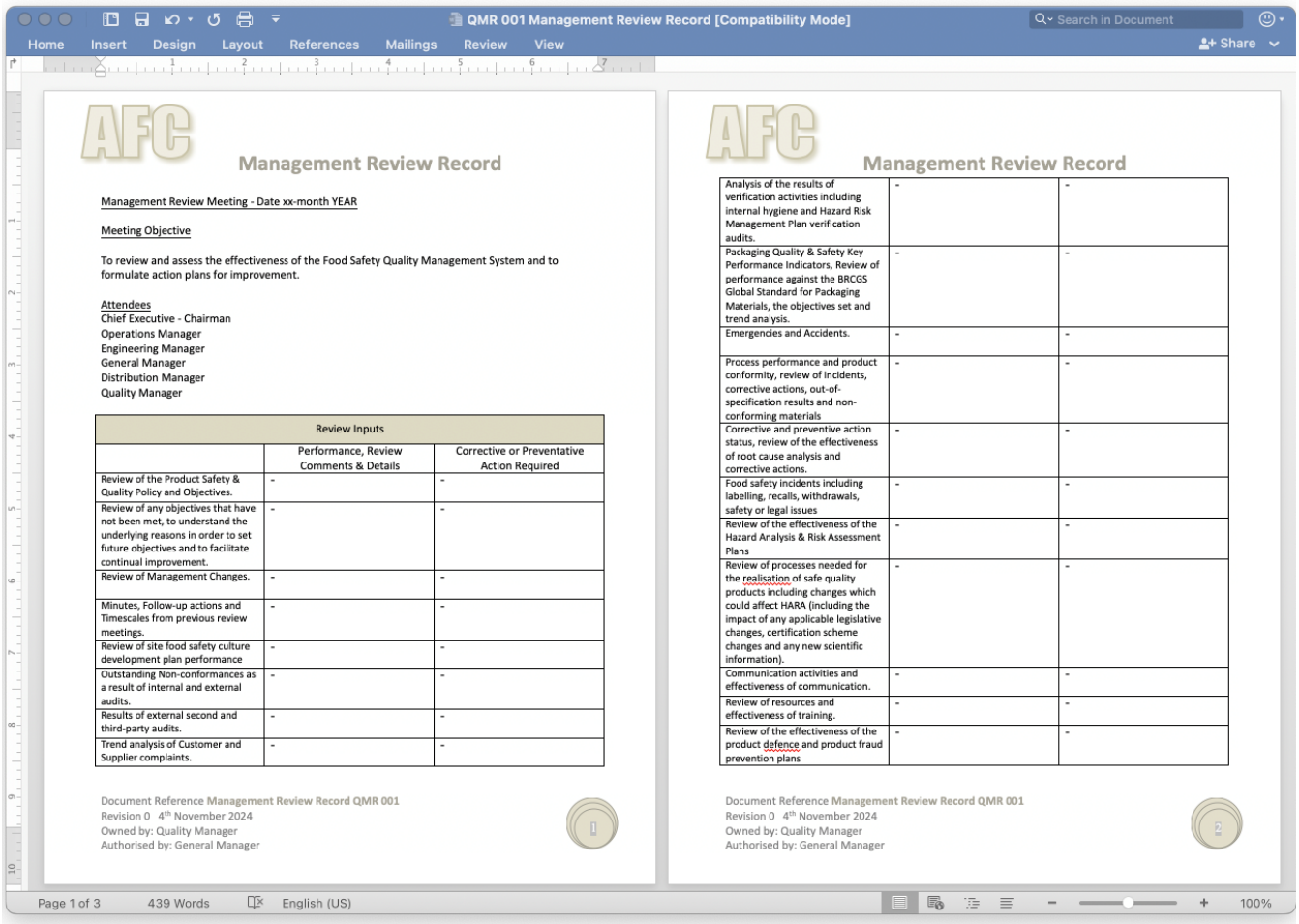
Venue

Agenda

1. Review of the Quality and Safety Policy
2. Review of Management Changes
3. Minutes and Follow-up actions from previous review meetings
4. Outstanding Non-conformances as a result of internal and external audits
5. Results of external second and third-party audits
6. Trend analysis of Customer and Supplier complaints
7. Analysis of the results of verification activities including internal hygiene and HRM plan verification audits
8. Quality Key Performance Indicators Review and trend analysis
9. Review of product safety and quality culture plan effectiveness
10. Emergencies and Accidents
11. Process performance and product conformity
12. Effectiveness of root cause analysis, corrective actions and preventive actions
13. Safety incidents including allergen control and labelling, recalls, withdrawals, safety or legal issues
14. Review of planning and development of the processes needed for the realisation of safe products including changes which could affect safety and the HRM Plan (including legislation changes and scientific information)
15. Changes to policies and objectives
16. Communication activities and effectiveness of communication
17. Results of review and system updating
18. Review of Resources and effectiveness of Training
19. Recommended improvements
20. Customer Feedback and Sales levels are reviewed to give an indication of trends
21. A.O.B

Attendees:

Senior Management Team		
Job Title	**Name**	**Role in Team**
Chief Executive		Chairman
General Manager		Deputy Chair
Operations Manager		Operations Reporting
Quality Manager		Food Packaging Safety and Quality Reporting
Planning Manager		Planning and Capacity Reporting
Distribution Manager		Distribution Reporting
Maintenance Manager		Services and Engineering Provision
Finance Manager		Financial Reporting
Human Resources Manager		Resource reporting



QMR 001 Management Review Record [Compatibility Mode]

Management Review Record

Management Review Meeting - Date xx-month YEAR

Meeting Objective

To review and assess the effectiveness of the Food Safety Quality Management System and to formulate action plans for improvement.

Attendees
Chief Executive - Chairman
Operations Manager
Engineering Manager
General Manager
Distribution Manager
Quality Manager

Review Inputs		
	Performance, Review Comments & Details	Corrective or Preventative Action Required
Review of the Product Safety & Quality Policy and Objectives.	-	-
Review of any objectives that have not been met, to understand the underlying reasons in order to set future objectives and to facilitate continual improvement.	-	-
Review of Management Changes.	-	-
Minutes, Follow-up actions and Timescales from previous review meetings.	-	-
Review of site food safety culture development plan performance	-	-
Outstanding Non-conformances as a result of internal and external audits.	-	-
Results of external second and third-party audits.	-	-
Trend analysis of Customer and Supplier complaints.	-	-

Document Reference Management Review Record QMR 001
Revision 0 4th November 2024
Owned by: Quality Manager
Authorised by: General Manager

Management Review Record

Analysis of the results of verification activities including internal hygiene and Hazard Risk Management Plan verification audits.	-	-
Packaging Quality & Safety Key Performance Indicators, Review of performance against the BRCGS Global Standard for Packaging Materials, the objectives set and trend analysis.	-	-
Emergencies and Accidents.	-	-
Process performance and product conformity, review of incidents, corrective actions, out-of-specification results and non-conforming materials	-	-
Corrective and preventive action status, review of the effectiveness of root cause analysis and corrective actions.	-	-
Food safety incidents including labelling, recalls, withdrawals, safety or legal issues	-	-
Review of the effectiveness of the Hazard Analysis & Risk Assessment Plans	-	-
Review of processes needed for the realisation of safe quality products including changes which could affect HARA (including the impact of any applicable legislative changes, certification scheme changes and any new scientific information).	-	-
Communication activities and effectiveness of communication.	-	-
Review of resources and effectiveness of training.	-	-
Review of the effectiveness of the product defence and product fraud prevention plans	-	-

Document Reference Management Review Record QMR 001
Revision 0 4th November 2024
Owned by: Quality Manager
Authorised by: General Manager

Page 1 of 3 439 Words English (US) 100%