Introduction

The company has planned, established, documented and implemented a food safety and quality management system for the site, which is maintained in order to continually improve its effectiveness in accordance with legislation, international standards and best industry practice. The company has planned and developed the processes that contribute to meeting the requirements of these standards and producing safe products.

<u>Scope</u>

The scope of the 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 international food safety standard IFS Food.

Due diligence

The Food Safety Quality Manual demonstrates due diligence of the company in the effective development and implementation of the food safety management system. These documents are fully supported by the completion of the records specified in this manual for the monitoring of planned activities, maintenance and verification of control measures and by taking effective actions when non-conformity is encountered.

Food Safety

The company is committed to supplying safe products for consumption. As part of this commitment, all products and processes used in the manufacture of food products are subject to food safety hazard analysis based on the Codex Alimentarius guidelines to the application of a HACCP system. All food safety hazards, that may reasonably be expected to occur, are identified by this process and are then fully evaluated and controlled so that our products do not represent a direct or indirect risk to the consumer. New information regarding food safety hazards is continually reviewed by the Food Safety team to ensure that the Food Safety and Quality Management system is continually updated and complies with the latest food safety requirements.



Should the company be required to outsource any process that may affect product conformity to the defined standards of the Food Safety Quality Management System then the site will assume control over this process. This is fully defined in all Sub-Contract Agreements.

Communication

The company has established and documented clear levels of communication for suppliers, contractors, customers, food authorities and staff within the food safety quality management system. Detailed communication arrangements and food safety communication responsibilities for all levels of management are contained in the food safety and quality manual.

The IFS Representative (Food Safety and Quality) is the Technical Manager, who retains responsibility and authority for external communication and liaison regarding the food safety management system. This responsibility for communication extends to ensuring there is sufficient information relating to food safety throughout the food chain. This communication includes documented agreements, contracts, specifications, product information, food safety leaflets, allergen advice and reports.

<u>Procedure</u>

These processes and their interaction are documented within this manual and its procedures. The top level procedures of the Food Safety Quality Management System Procedures are divided into 6 sections and pre-fixed QM as follows:

Section 1 QM 1.1 Corporate Policies QM 1.1 Corporate Policies QM 1.2 Food Safety and Quality Objectives QM 1.2 Corporate Structure QM 1.2 Corporate Structure - Job Descriptions QM 1.2 Corporate Structure - Organisational Chart QM 1.3 Customer Focus QM 1.4 Management Review QM 1.5 Communication



Section 2

QM 2.1 Food Safety and Quality Management System

QM 2.1.1 Document Control

QM 2.1.2 Record Keeping

QM 2.2 Food Safety Management - HACCP System

Section 3

- QM 3.1 Resource Management
- QM 3.2.2 Protective Clothing
- QM 3.2.3 Medical Screening
- QM 3.3 Training and Instruction
- QM 3.4 Staff Facilities

Section 4

QM 4 Control of Operations

QM 4.1 Contract Agreement

QM 4.2 Specifications

QM 4.3 Product Development

QM 4.4 Purchasing

QM 4.5 Product Packaging

QM 4.6 - 4.9 Site Standards

QM 4.10 Cleaning and Disinfection

QM 4.11 Waste Disposal

QM 4.12 Control of Foreign Matter Contamination

QM 4.12 A Glass Policy

QM 4.12 B Control of Brittle Materials

QM 4.12 C Glass & Brittle Material Breakage Procedure

QM 4.12 D Detection of Foreign Objects

QM 4.13 Pest Control & Monitoring

QM 4.14 Receipt and Storage

QM 4.15 Transport

QM 4.16 Maintenance and Repair

QM 4.17 Equipment

QM 4.18 A Product Identification

QM 4.18 B Product Identification & Traceability Appendix

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QM 4.18 C Traceability System QM 4.19 Identity Preserved Foods QM 4.20 Allergen Management

Section 5

QM 5.1 Internal Audits QM 5.2 Site Factory Inspections QM 5.3 Process Validation QM 5.4 Calibration QM 5.5 Quantity Control QM 5.6 Laboratory Quality Manual QM 5.7 Product Quarantine & Release QM 5.8 Management of Complaints QM 5.9.1 Management of Incidents QM 5.9.2 Product Recall & Withdrawal QM 5.10 Management of Non-conformities & Non-conforming Product QM 5.11 Corrective Action and Preventative Action

<u>Section 6</u> QM 6.1 Defence Assessment QM 6.2 Site Security QM 6.3 Personnel and Visitor Security QM 6.4 External Inspections

The HACCP documents of the Food Safety Quality Management System Procedures are supplemented by HACCP Manual documents as follows:

HM 1 HACCP System HM 2 HACCP Team HM 3 HACCP Prerequisites HM 4 HACCP Scope and Product Information HM 5 HACCP Intended Use HM 6 HACCP Flowcharts HM 7 HACCP Flowchart Verification HM 8 Hazard Identification



HM 9 Hazard Assessment HM 10 Identification and Assessment of Control Measures HM 11 Identification of Critical Control Points (CCPs) HM 12 Establishing Critical Limits for each CCP HM 13 Establishing a Monitoring System for each CCP HM 14 Establishing a Corrective Action Plan HM 15 Establishing Verification Procedures HM 16 Establishing HACCP Documents and Records HM 17 Review of the HACCP Plan HM 18 Flow Diagram HM 19 Product Description HM 20 Hazards HM 21 HACCP Validation HM 22 HACCP Plan HM 23 HACCP Verification Audit Summary HM 24 HACCP Instruction 1 HM 25 HACCP Instruction 2 HM 26 Hazard Instruction 3 HM 27 HACCP Definitions HM 28 HACCP Verification Record HM 29 HACCP Steering Group Review HM 30 Raw Material Summary HM 31 Finished Product Summary HM 32 Decision Tree

HM 33 HACCP Planner

The controlled records of the Food Safety Quality Management System are pre-fixed FSR and are as follows:

- FSR 001 Management Review Minutes
- FSR 002 Training Record
- FSR 003 Product Release Record
- FSR 004 Design and Development Records
- FSR 005 Supplier Assessment Record
- FSR 006 Validation Record

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- FSR 007 Identification and Traceability Record
- FSR 008 Register of Customer Property
- FSR 009 Calibration Record
- FSR 010 Internal Audit Record
- FSR 011 Records of Non-conforming Product
- FSR 012 Corrective Action Request Form
- FSR 013 Preventative Action Request Form
- FSR 014 Supplier Self Assessment and Approval Form
- FSR 015 Equipment Commissioning Record
- FSR 016 Return to Work Form
- FSR 017 Hygiene Policy Staff Training Record
- FSR 018 Complaint Investigation Form
- FSR 019 Prerequisite Audit Checklist
- FSR 020 Knife Control Record
- FSR 021 Knife Breakage Report
- FSR 022 Goods in Inspection Record
- FSR 023 Equipment Cleaning Procedure
- FSR 024 Glass and Brittle Plastic Breakage Record
- FSR 025 Metal Detection Record
- FSR 026 First Aid Dressing Issue Record
- FSR 027 Cleaning Schedule
- FSR 028 Cleaning Record
- FSR 029 Engineering Hygiene Clearance Record
- FSR 030 Glass and Brittle Plastic Register
- FSR 031 GMP Audit Checklist
- FSR 032 Vehicle Hygiene Inspection Record
- FSR 033 Outgoing Vehicle Inspection Record
- FSR 034 Pre Employment Medical Questionnaire
- FSR 035 Visitor Questionnaire
- FSR 036 Product Recall Record
- FSR 037 Shelf Life Confirmation Record
- FSR 038 Accelerated Keeping Quality Log
- FSR 039 Goods In QA Clearance Label
- FSR 040 Maintenance Work Hygiene Clearance Form
- FSR 041 Changing Room Cleaning Record

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- FSR 042 Colour Coding Red Process Areas
- FSR 043 Daily Cleaning Record for Toilets and Changing Rooms
- FSR 044 Drain Cleaning Procedure Filler Areas
- FSR 045 General Cleaning Procedure
- FSR 046 Product QA Clearance Label
- FSR 047 CIP Programmes Log
- FSR 048 Sample Filler Cleaning Record
- FSR 049 Pipe Diameter Flow Rate Conversion Table
- FSR 050 QC Online Check Sheet

The Criteria and Methods required to ensure that the operation and control of these processes are effective are documented in these procedures and records.

These procedures are supported by second tier documents specific to each area including:

- Work Instructions
- Specifications
- Testing schedules
- Risk assessments
- Job Descriptions
- HACCP Plans
- Critical Control Point Monitoring Procedures

Measurement, monitoring and review are carried out by analysis of data in key areas including:

- Critical Control Point monitoring
- Analytical testing
- Microbiological testing
- Complaints analysis
- Key Quality performance indicators
- Standard Exception Reporting
- Results of Inspections
- Results of Internal audits



- Results of External Audits

The company has assessed the resources required to implement, maintain, and improve the Food Safety Management System and these resources have been provided including:

- Skilled Personnel
- Suitable materials
- Suitable equipment
- Appropriate Hardware and Software
- Infrastructure
- Information
- Finances
- Audit resource
- Training resource

Action is taken in response to results in order to correct and prevent deficiencies and to improve the probability of achieving company objectives.

Regular management reviews are conducted by the Senior Management team to ensure performance is monitored and analysed. Review outputs include site quality objectives which are published and communicated to all staff to ensure focus is maintained both on meeting these objectives and on continuous improvement.

Responsibility

Senior Management is responsible for implementing, maintaining, reviewing and improving the Food Safety Quality Management System. The Technical Manager is a member of the Senior Management team and has been appointed the Management and Food Safety Representative.

Customer, Statutory and Regulatory Requirements

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



- Food Safety Act
- Food Regulations
- EEC Directives
- 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 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. Maintenance of these files is the responsibility of the Technical Manager who is responsible for circulating updates to relevant sections of the business. To ensure legal compliance authority and guidance for use of new labels is required from the Technical Manager prior to first production.

The Senior Management team ensure that the design and implementation of the Food Safety Quality Management System is within the guidelines of customer, statutory and regulatory documents, also taking into consideration:

- the business environment, changes in that environment or risks associated with that environment
- varying needs of the business
- company objectives
- the processes employed on site
- the size and organisational structure of the site

This process is discussed during Management review and the outcome documented in the minutes.

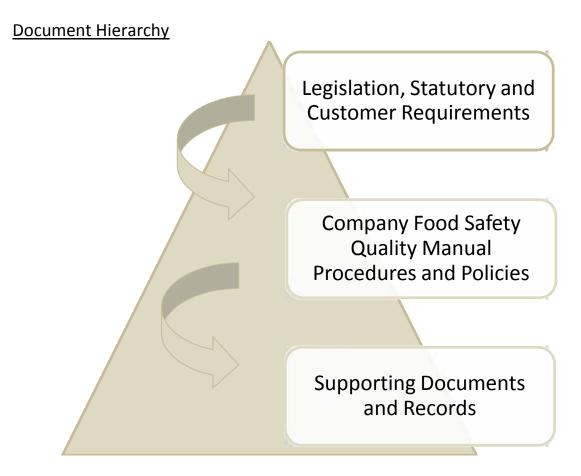


Improvement

The company is committed to continual improvement of its management systems through:

- Food safety policy and objectives
- Quality policy and objectives
- Auditing of systems and processes
- Corrective and preventive actions
- Analysis of data
- Management Review Refer to Management Review Procedure
- The use of hazard analysis in developing schedules for quality and food safety control
- aids in defining preventive actions and in continual improvement of processes.







Food Safety Quality System Process Diagram



