

#### Introduction

The company has planned, established, documented and implemented a Food Packaging Safety Management System for the site in order to continually improve and ensure compliance with legislation, international standards and best industry practice.

#### Scope

The scope of the Food Packaging Safety Management System includes all products and all requirements of the SQF Food Safety Code for Manufacture of Food Packaging.

#### Due diligence

The Food Packaging Safety Manual demonstrates due diligence of the company in the effective development and implementation of the food packaging 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 Packaging Safety**

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

Should the company be required to outsource any process that may affect product conformity to the defined standards of the Food Packaging Safety 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, authorities and staff within the Food Packaging Safety Management System. Detailed communication arrangements and communication responsibilities for all levels of management are contained in the Food Packaging Safety Manual. The scope of the communication procedures applies to all members of staff, both full time and temporary.

Document Reference QM 2.2.1 Food Packaging Safety Management System





The SQF Practitioner is the Technical Manager, who retains responsibility and authority for external communication and liaison regarding the Food Packaging Safety Management System. This responsibility for communication extends to ensuring there is sufficient information relating to Food Packaging Safety throughout the food chain. This communication includes documented agreements, contracts, specifications, product information, food packaging safety leaflets, allergen labelling advice and reports.

#### Procedure

These processes and their interaction are documented within this manual and its procedures. The main procedures of the Food Packaging Safety Management System Procedures are pre-fixed QM and are as follows:

#### System Elements Manufacture of Food Packaging

- QM 2.1.1 Food Safety Policy and Objectives
- QM 2.1.2 Management Responsibility
- QM 2.1.2A Appendix Organizational Chart
- QM 2.1.2B Appendix Job Descriptions
- QM 2.1.3 Management Review
- QM 2.1.4 Complaint Management
- QM 2.1.5 Crisis Management Planning
- QM 2.2.1 Food Safety Management System
- QM 2.2.2 Document Control
- QM 2.2.3 Record Control
- QM 2.3.1 Product Development
- QM 2.3.2 Raw and Packaging Materials
- QM 2.3.3 Contract Services
- QM 2.3.4 Contract Manufacturers
- QM 2.3.5 Finished Product Specifications
- QM 2.4.1 Compliance with Food Legislation
- QM 2.4.2 Good Manufacturing Practices
- QM 2.4.3 Food Safety Plans
- QM 2.4.4 Approved Supplier Program
- QM 2.4.5 Control of Non-Conforming Product or Equipment
- QM 2.4.6 Product Rework
- QM 2.4.7 Product Release
- QM 2.4.8 Environmental Monitoring
- QM 2.5.1 Validation and Effectiveness
- QM 2.5.2 Verification Activities
- QM 2.5.3 Corrective Action and Preventative Action

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- QM 2.5.4 Product Sampling, Inspection and Analysis
- QM 2.5.5 Internal Audits and Inspections
- QM 2.6.1 Product Identification
- QM 2.6.2 Product Traceability
- QM 2.6.2 Identification and Traceability System Appendix
- QM 2.6.3 Product Withdrawal and Recall
- QM 2.7.1 Food Defense Plan
- QM 2.7.2 Food Fraud
- QM 2.7.2A Food Fraud Raw Material Assessment Calculator
- QM 2.8.1 Allergen Management
- QM 2.9 Training

#### Good Manufacturing Practices for Production of Food Packaging

- QM 13.1 Site Location and Approval
- QM 13.2 Construction of Premises and Equipment
- QM 13.2.7 Equipment, Utensils and Protective Clothing
- QM 13.2.8 Premises and Equipment Maintenance
- QM 13.2.9 Calibration
- QM 13.2.10 Pest Prevention
- QM 13.2.11 Cleaning and Sanitation
- QM 13.3.1 Personnel Hygiene and Welfare
- QM 13.3.2 Hand Washing
- QM 13.3.3 Clothing
- QM 13.3.4 Jewellery Policy
- QM 13.3.5 Visitors
- QM 13.3.6 8 Staff Facilities
- QM 11.3.10 Lunch Rooms
- QM 13.4 Personnel Processing Practices
- QM 13.4A First Aid
- QM 13.5.1 2 Water and Ice Supply
- QM 13.5.3 Air Quality
- QM 13.6.1 3 Storage
- QM 13.6.4 Loading, Transport and Unloading Practices
- QM 13.7 Separation of Functions
- QM 13.7.2 Control of Foreign Matter Contamination
- QM 13.7.2A Glass Policy
- QM 13.7.3 Glass & Brittle Material Breakage Procedure
- QM 13.8 Waste Disposal
- QM 13.9 Exterior

Document Reference QM 2.2.1 Food Packaging Safety Management System





The HACCP manual documents of the Food Packaging Safety Management System Procedures are prefixed HACCP.

The controlled records of the Food Packaging Safety Management System are pre-fixed QMR.

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:

- Validation Records
- Verification Records
- Work Instructions
- Specifications
- Testing schedules
- Risk assessments
- Job Descriptions
- 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 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 Safety Management System and these resources have been provided including:

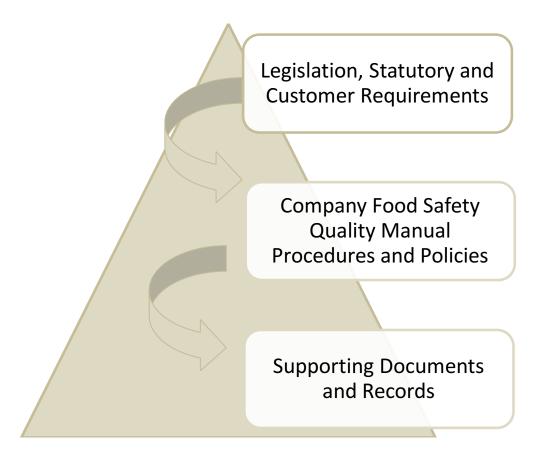
- Skilled Personnel
- Suitable materials
- Suitable equipment
- Appropriate Hardware and Software
- Infrastructure
- Information
- Finances
- Audit resource
- Training resource

Document Reference QM 2.2.1 Food Packaging Safety Management System





### **Document Hierarchy**





### Food Packaging Safety Quality System Process Diagram





