AUDIT QUALITY ASSURANCE QUESTIONNAIRE

H E Stringer Ltd

Supplier:	H E Stringer Ltd (Stringer Flavours)
Address:	Icknield Way Industrial Estate Tring Hertfordshire United Kingdom HP23 4JZ
Factory:	Location above
Contacts:	Katrina Barker (Technical) Martin Ford (Regulations & Compliance) Huw Williams (Commercial)
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Email:	info@stringer-flavour.com
Web:	www.stringer-flavour.com
Quality System:	British Retail Consortium Global Standard – Food

Supporting Documents: The following document copies (policies & procedures) are attached as Appendices I-X

- HACCP Outline & Plan
- Quality Policy
- Environmental Policy
- Food Safety Policy
- Hygiene Policy
- Glass Control & Breakage Procedure
- List of Quality System Procedures
- Complaints & Non-conformances Procedure
- Recall Procedure
- Specific material Handling Requirements

Certificate copies downloadable from the web-site:
BRC quality standard; Soil Association (Organic); Kosher

Product Specifications:	Please contact us
Safety Data Sheets:	Please contact us

Public & Product Liability Insurance: £2,000,000 in any one event
Insurer: Fusion Insurance Services Ltd; Policy CC0000670001

Introduction

H E Stringer is a specialist independent manufacturer of food flavourings operating from a purpose-built factory owned by the company. The factory has received significant investment in 2004/5 and was constructed in 1967. The company is known for its flexibility, response and exceptional record for product and service quality.

The company operates 5 flavouring production processes in specialised areas of the factory: distillation, extraction, reaction, liquid compounding and powder blending. Other process steps are conducted by approved contractors.

The company specialises in highly concentrated 'top note' flavours (typically used at no more than 0.5% of a finished food product. All products are produced to order in batches, ensuring optimum freshness. Specialities include natural flavours, organic flavourings and aromas, and unique savoury process flavourings.

H E Stringer annual turnover is approximately €1.6m. The company employs 16 people (4 technical; 4 production; 3 administration; 2 maintenance & hygiene; 2 sales; 2 business sector consultants). Specialist quality system consultancy is provided by Total Food Safety Ltd.

Market expertise includes confectionery, bakery, speciality drinks, and dairy products, savoury top-notes for seasonings & processed foods and flavourings for animal foods.

The company was established in 1955 and is privately owned (second generation). In 1967 it acquired the present site in Tring, Hertfordshire (30 km north-west of London). In the 1980's the company developed its' unique competence in savoury process flavourings. In 1998 H E Stringer pioneered the development of certified organic flavours. 2003 saw the acquisition of the good-will of Zylepsis Ltd (a developer of specialist flavourings) and in 2004 acquired the Spalton Nutrition business, manufacturing flavourings for animal foods (all ingredients fit for human food). The company's reputation for quality was underlined in 2005 by the winning of BRC certification.

H E Stringer is a member of the British Essence Manufacturers Association (BEMA) supporting regulatory compliance; and Hertfordshire Chamber of Commerce, supporting export compliance.

1. Pest Control:

1.1. Our contractor is:	Rokill Ltd Head Office Rossland House 119 Alma Road Bournemouth BH9 1AE
1.2. Scope:	The control of rodents, flying and crawling insects internally & externally.
1.3. Visit frequency:	8 inspections per annum 2 Field Biologist inspections per annum
1.4. Bait stations:	Internal & external
1.5. Electronic Fly Killers:	Maintained 2x per annum, tubes replaced annually in early Spring
1.6. Discrepancies:	Visit reports considered at monthly Operations Team Meetings with follow-up & minutes of closure
1.7. Records:	Full Pest Control contract, certificates of qualification & records maintained in the Administration Office

2. Product Testing & Laboratories:

2.1. In House testing as appropriate:

2.1.1. Liquid Flavours & Raw Materials:
- Specific gravity
- Refractive index
- Flash point
- Appearance aroma taste
- GCMS

2.1.2. Powdered Flavours & Raw Materials:
- Moisture content
- Salt content
- Sieve analysis
- Appearance aroma taste

2.2. External third party testing
- Microbiological; UKAS certified laboratory (ILS Ltd)

2.3. Environmental microbiological swabbing
- Quarterly fixed plan for critical areas plus
- Quarterly random

2.4. Water microbiological testing:
Cooling tower maintained (legionella risk) under contract (Freeston Water plc)
Raw material water: outlet & intake tested (TVC & pathogens) quarterly under contract (Freeston Water plc)
Domestic: random testing (TVC & pathogens) on quarterly basis (Freeston Water plc)

3. Personal Hygiene & Training

3.1. Pre-employment medical declaration for all employees
3.2. Return to work declaration (illness & foreign travel) mandatory for food-handlers
3.3. Company Hygiene Policy included in Induction Training (all new employees)
3.4. Basic Food Handling & Hygiene Certificate mandatory for all food-handlers
3.5. Training records maintained in the Administration Office
3.6. Protective work-wear
- 3.6.1. Restricted to factory & factory changing
- 3.6.2. Segregated outside clothing
- 3.6.3. Clean work wear stored in purpose designed lockers
- 3.6.4. Work-wear changed minimum daily or as required between batches
- 3.6.5. Used work-wear deposited in purpose designed bin on exit from manufacturing area
- 3.6.6. Laundered under contract weekly

3.7. Personal jewellery prohibited in manufacturing areas
3.8. Mandatory hand-wash plus alcohol gel stations at all doors into manufacturing areas

4. Suppliers & Raw Material Control

4.1. New raw materials/suppliers are approved by the HACCP Team
4.2. New raw materials are the subject of a HACCP study
4.3. New suppliers are the subject of a risk assessment
4.4. Incoming raw materials are checked on the basis of HACCP/risk assessment. The minimum requirement is receipt of a Certificate of Analysis conforming to the approved specification

4.5. All supplier and raw material performance is routinely monitored at monthly Operations Team meetings and twice yearly HACCP Team meetings
4.6. On QC release all units of incoming materials are labelled with a serial lot number at the BBE date
4.7. Raw material BBE dates are automatically monitored monthly by the Macola Production Control Database
4.8. H E Stringer accepts no substances that may have benefited from genetic modification

5. Manufacturing Controls

5.1. Trace-ability is maintained by a specific database module ("Serial Lot Trace-ability") integrated with the Macola production management and sales order processing database
  5.1.1. Each incoming unit of raw material is automatically assigned a sequential serial lot number, linked in the database to Purchase Order and supplier record
  5.1.2. On QC release each unit of raw material is labelled with the Serial Lot Number (also description, part-code, and BBE date)
  5.1.3. Production Work-sheets linked to customer sales orders contain full formulation details and automatically specify the raw material lot to be picked
  5.1.4. The production operative signs against the serial lot number picked, noting any stock discrepancies for continuous analysis
  5.1.5. The system automatically indicates serial lot number changeovers which are checked by the operative
  5.1.6. The Serial Lot Trace-ability system is challenged at least once per year through a Recall Procedure rehearsal
5.2. Product segregation: Standard Operating Procedures are in place governing the handling, identification and segregation of the following categories of raw materials
  5.2.1. Non-conforming product
  5.2.2. Organic product
  5.2.3. High allergenic risk material
  5.2.4. Customs bonded material
  5.2.5. Materials requiring particular storage conditions
5.3. The following in-process checks are made by the production operative for *every production batch* and signed on satisfactory completion

forming a mandatory part of each production record which is checked and counter-signed by the Senior Operations Manager

5.3.1. Hygiene check of area & vessels (all product)
5.3.2. Integrity check of still components & chemical storage vessels, before use (as appropriate)
5.3.3. Check of filter/sieve, before use (all products)
5.3.4. Check of metal detector, before use (powder flavours, as appropriate – 1.5mm Fe, 2mm non-Fe, 2.5mm ss)
5.3.5. Integrity check of still components & chemical storage vessels, after use (as appropriate)
5.3.6. Check of filter/sieve, after use (all products)
5.3.7. Check of metal detector, after use (powder flavours, as appropriate)
5.3.8. Check on completion of clean-down procedure (all products & batches)
5.3.9. Immediate reporting and non-conformance report raised with Senior Operations Manager/Director in event of failure of 2, 3, 5, 6 and repeated failure of 4 & 7
5.3.9.1. Batch on QAHOLD pending disposition
5.3.9.2. NCR recorded with production Record

5.4. Foreign body control: The Critical Control Point for the control & elimination of foreign body risk is the filtering/sieving of all product immediately into the finished pack, as follows:
5.4.1. All liquids through a 500 micron filter
5.4.2. All powders through a 1.3mm sieve
5.4.3. Filters/sieves are the subject of detailed inspection, cleaning & management protocols for each batch

5.5. Finished product release: Parameters for release are held on a dedicated database that is used to produce a release certificate for each production order/each batch identifying the required method for release
5.5.1. Physical analysis as required is carried out by the Senior Operations Manager or qualified member of the technical staff with the record signed as 'passed'
5.5.2. Appearance, aroma, taste are assessed against a previous accepted standard by two qualified technical personnel, with the record signed as 'passed'
5.5.3. When indicated on the release certificate samples are sent away for micro testing & product placed on hold with the production

record stamped as awaiting results (managed by the Senior Operations Manager)

5.5.4. The final release is indicated by a 'Pass' stamp and the signature of the Technical Director or qualified member of the Technical Team

5.5.5. The release Certificate forms a mandatory part of the batch Production Record (along with the production order & in-process batch inspection sheet)

5.5.6. In the event of a finished product failing against an inspection standard it is segregated on QAHOLD and a Non-conformance Report initiated

5.5.7. A copy of any relevant NCR is added to the Production Record (retained and archived for 3 years)

5.5.8. A representative sample is retained for 2 years from every production batch

5.6. Non-conformance Reports identify & record all actions taken, completion dates & responsibilities, together with any systemic Corrective Actions (CAR). NCR's and CAR's are circulated to the entire senior management team on raising and are reviewed at the monthly Operations Team Meeting. Implications are also reviewed by the HACCP team. A register is kept of all NCR's & CAR's and a paper record held in the Administration Office. A copy is kept with the Production Record.

5.7. All critical items of measurement equipment are registered, categorised and calibrated under contract by an appropriate external authority according to manufacturer's recommendations. Other internal checks may be made on both critical and non-critical equipment using known measures

6. Audits

6.1. The following internal audits are routinely conducted

6.1.1. Production area inspection (Production Operative, each batch)

6.1.2. Glass/hard Plastic Register (Senior Operations Manager, weekly)

6.1.3. External Condition (Maintenance Engineer, monthly)

6.1.4. Full Area Hygiene/GMP (Senior Operations Manager, monthly)

6.1.5. Production Record Audit (Managing Director, 1 weeks full records random per month)

6.1.6. Quality procedure records (Director, annually)

6.1.7. HACCP Performance (Managing Director, every 6 months)

6.2. The following external audits are routinely conducted

6.2.1. Hygiene, procedure & GMP (independent third-party, quarterly)

6.2.2. British Retail Consortium certification audit (SGS Ltd, annually, October)

7. Hygiene, Maintenance & House-keeping

7.1. The factory is designed and built for the manufacture of food flavourings

7.2. All walls are constructed finished and maintained to prevent the accumulation of dirt, to reduce condensation and mould growth, and for ease of cleaning

7.3. Ceilings and overheads are constructed finished and maintained to prevent the accumulation of dirt, to reduce condensation and mould growth, and for ease of cleaning

7.4. Processing rooms have floors designed to meet the demands of the processes and to withstand cleaning materials & methods. The floors are impervious and maintained to prevent risk to product.

7.5. Processing room floors fall to drains

7.6. Processing room wall/floor junctions are coved

7.7. Windows are of reinforced Georgian glass covered internally by British Standard shatter-proof security film

7.8. Warehouse racks and fixed location processing equipment are located away from walls to permit all round access and convenient cleaning

7.9. External doors to material handling areas are not open during production operations and are protected against pest ingress

7.10. Ventilation is by extraction to atmosphere through ducts screened to prevent the ingress of pests

7.11. All areas are provided with adequate lighting. All bulbs and strip lights (including EFK units) are protected by shatter-proof diffusers or sleeves

7.12. All glass and hard plastics throughout the production areas are documented with digital photos on a register that is the subject of complete weekly audit by the Senior Operations Manager (in addition to the area & equipment audit carried out by the Production Operative before and after each Production Batch, recorded on the Production Record)

7.13. Maintenance is managed and executed by the Company Engineer

7.14. Site and factory condition is the subject of a detailed monthly audit

7.15. There is an annual Planned Maintenance Schedule governing preventative maintenance

7.16. Hygiene compliance (internal & external) is maintained to a written schedule by area (daily/weekly/monthly/seasonally, as appropriate) with audited sign-off
7.17. Hygiene compliance is audited monthly throughout by the Senior Operations Manager
7.18. Hygiene in production & warehouse areas is on a 'clean as you go' basis by the Production Team, with thorough processing area clean-down between each production batch, with sign-off recorded on the Batch Production Record
7.19. Cleaning procedures & schedules are documented with cleaning materials identified and controlled by colour coded containers and signs throughout the factory
7.20. Production equipment is designed and maintained to facilitate safe & hygienic operation and to eliminate risks of contamination
7.21. All equipment is properly specified before commissioning. Equipment taken out of commission for maintenance is not re-commissioned without recorded sign-off by the Company Engineer and a qualified Production Operative

8. Raw Material & Packaging Storage

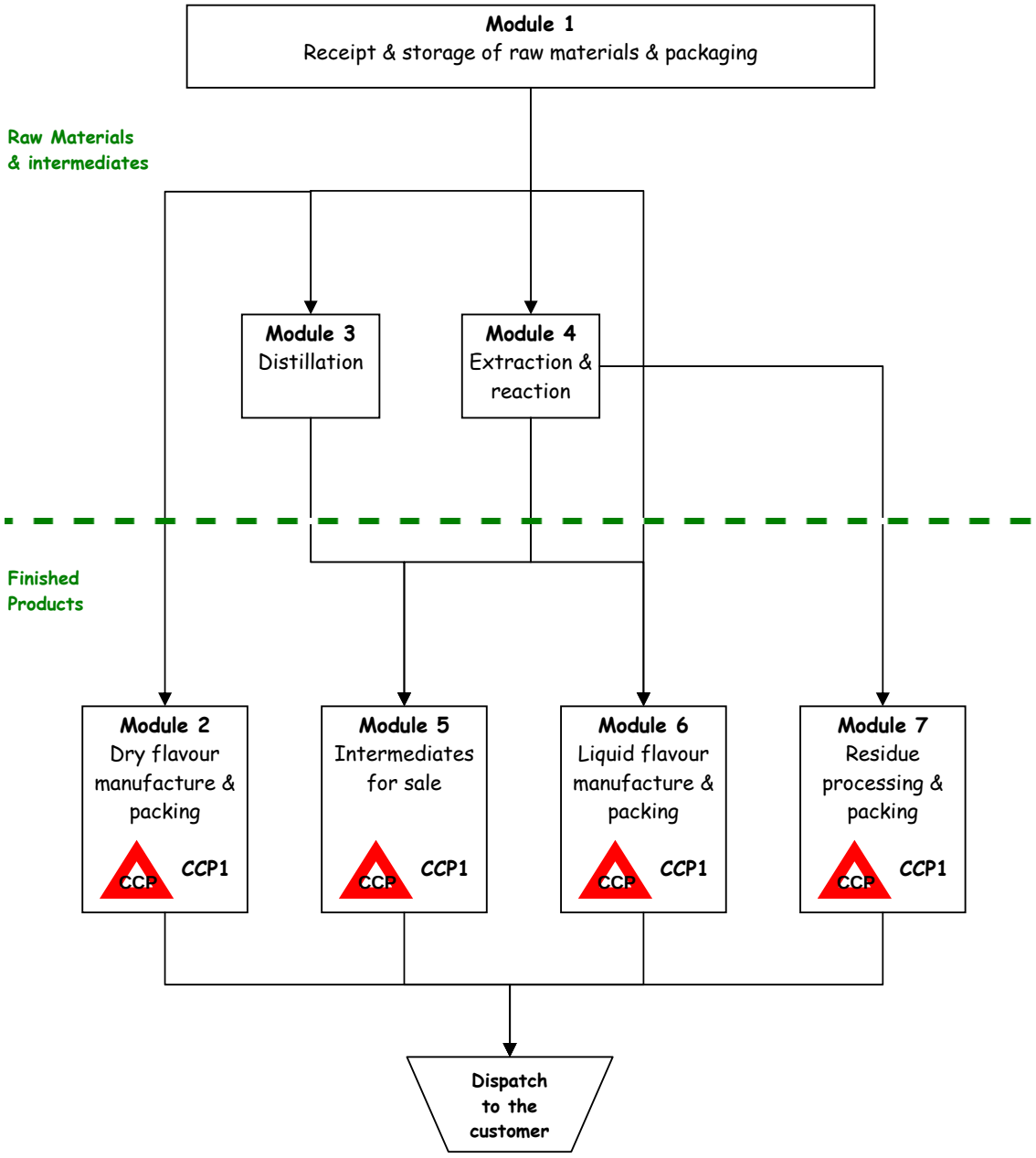
8.1. Bulk raw materials and packaging are stored on racks in the warehouse at ambient temperature & humidity
8.2. Small units of specialist liquid flavour chemicals are stored on stainless steel racks in an area with sloping floors to drains
8.3. Aggressive and odiferous chemicals are stored in locked steel cabinets
8.4. Some chemicals are only stable in glass bottles – these are subject to a controlled list and kept in locked steel cabinets and are signed out and inspected on each issue for use (recorded on the Production Record)
8.5. Some materials are refrigerated or frozen, for condition only (NOT necessary for safety – temperature control is not a CCP)

9. Finished Product Storage

9.1. No finished product is stored – all is made to order
9.2. Finished products are palletised or prepared for dispatch daily and are staged in the Dispatch area on pallets
9.3. There are no external storage locations
9.4. The condition of vehicles delivering and collecting is inspected and recorded by the Packing & Dispatch Manager

APPENDIX I: HACCP SYSTEM OVERVIEW (uncontrolled copy)

Modules 1-7 Overall Process Flow



HACCP DOCUMENTATION

7: HACCP PLAN (Uncontrolled copy)

Date:	25 August 2005	Products:	Dry flavours, distillates & extracts, liquid reaction flavours & vanilla solids	Issue number:	1
Line:	All products		Page 11 of 27	Authorised:	Uncontrolled

CCP No.	Process Step	Hazard Description	Control Measures	Target Level & Tolerances	Monitoring Procedures	Responsibility	Corrective Actions
1	Filtering/Sieving	Physical hazards - introduced during the addition of the raw materials to the mixing vessel or blender e.g. nuts, bolts, washers, gaskets or hard plastics; or from the manufacturing environment	Filter/sieve integrity checks per batch, before and after batch production	100% compliance i.e. absence of physical hazards, any object, any hazardous material (inc glass & metal) >1.3mm (powders) or >500 micron (liquids)	Filter check on Batch Inspection Sheets reference QMP10 & 10a	Senior Operations Manager (SOM) & Production Operatives (PO)	Remove hazard (if possible) replace damaged filter, record any actions onto Production Record – Batch Inspection Sheet. If filter/sieve is broken quarantine relevant materials, isolate then re-sieve. Raise NCR, report to SOM or director before release. QMP10a refers.

APPENDIX II: COMPANY QUALITY POLICY (uncontrolled copy)

The Company Quality, Hygiene & Safety policies is communicated to all new employees on the first day of induction

A copy of Policy documents is positioned within every new employee's copy of the Company Induction Manual

The Quality Policy is positioned at the entrance of the manufacturing unit, and on Staff Information notice-boards throughout the site.

The Managing Director is responsible for performing periodic team briefing sessions thus ensuring all employees fully understand and adopt the policy requirements.

Quality Policy

It is the policy of H E Stringer Ltd to source, manufacture, package & supply safe, legal & reliable products & to perform these functions in an efficient & professional manner in order to fully meet or exceed customer expectations at all times

All company personnel, without exception, are accountable for product safety & quality

H E Stringer Ltd recognises that its employees are its most important asset & evaluates its training & development needs in order to assess achievement & improve its future effectiveness

The company's Quality System, described in the Quality Manual & supporting documentation, endorses the requirements of the British Retail Consortium Technical Standard & is designed to position H E Stringer Ltd as the most compelling supplier in its sector

Signed:
(Managing Director)

Signed:
(Technical Director)

Signed:
(Senior Operations Manager)

APPENDIX III: COMPANY ENVIRONMENTAL POLICY (uncontrolled copy)

ENVIRONMENTAL POLICY STATEMENT

The management of H E Stringer Limited undertakes to cause minimum disruption to the environmental integrity of its locality and will not wilfully damage or endanger the surrounding area.

H E Stringer Limited will not pollute local watercourses with unauthorised discharge nor devalue the environment with unacceptable levels of noise or odour. The company will arrange for the safe removal of any waste materials.

The management remains committed to the preservation of the local environment and will actively work with the local Environmental Agencies to achieve this goal.

Signed:
(Managing Director)

Signed:
(Technical Director)

Signed:
(Senior Operations Manager)

APPENDIX IV COMPANY FOOD SAFETY POLICY (uncontrolled copy)

Food Safety Policy

It is the policy of H E Stringer Ltd to manufacture & supply "safe" & "quality" food products

The Company is committed to operating high standards of food hygiene to ensure that we:

- Supply good quality, safe food products to our customers
- Maintain the cleanliness of the premises & equipment
- Comply with law & relevant legislation
- Prevent food contamination by microbiological organisms
- Prevent food contamination by foreign body ingress
- Avoid problems caused by pests and insects
- Develop good hygiene awareness
- Create good working conditions
- Ensure our suppliers comply with our hygiene requirements

The Company provides the necessary equipment, facilities & training to ensure high standards are maintained.

Good food hygiene and quality is everyone's responsibility. The reputation of the Company is dependent upon this.

Signed:
(Managing Director)

Signed:
(Technical Director)

Signed:
(Senior Operations Manager)

APPENDIX V: COMPANY HYGIENE & SAFETY POLICY (uncontrolled copy)

Introduction

As you are working where food is produced there are rules that MUST be observed. These rules are necessary to comply with the law. There are also precautions to be taken which when observed will contribute to your own well being. Certain rules apply specifically to FOOD HANDLERS. The requirements of the Company are set out here under various headings although they all come within the scope of Health and Safety. Failure to observe the rules will result in disciplinary action and removal from controlled areas. Please refer to your Company Handbook.

Clothing.

Within the production and laboratory areas rules apply. Personnel will wear white overalls or lab-coats. Blue hair nets should be worn at all times by all personnel entering production areas to cover all hair and the ears. Hairnets should be applied prior to the overall/coat to avoid any loose hair falling onto the protective clothing. Suitable footwear and gloves will also be used where appropriate. These items are all supplied by the Company for use whilst working on site and are not to be used outside of the work area.

All personnel should, when visiting the production areas, wear white coats and blue hair nets. Loose articles of jewellery should be removed before entering the production areas as they present a hazard (this includes all rings other than a plain wedding band; earrings; wristwatches; cuff-links; necklaces).

The clean work-wear station is located at the in the entrance corridor at the foot of the stairs to the canteen.

Production staff should remove all work-wear before leaving the production area for extended periods and before entering the toilet. Production work-wear to be re-used should be hung on the rack indicated in the Factory Changing Room. Dirty work-wear should be deposited in the laundry container at the entrance to the production areas.

Circulation

All staff will enter and exit the site through the main entrance, signing in/out on the Employee Log-sheet (to meet Fire Regulations). There is no thoroughfare allowed through any other external door – all other doors have designated and specific uses (deliveries & dispatch, fire escape, moving heavy equipment). The entrance to areas designated as Production Areas is through the marked double doors from the main corridor.

Smoking

Smoking is not permitted within the boundaries of the car parks, yard or buildings. As smoking in food production areas is illegal this offence carries an automatic penalty of dismissal.

Personal Hygiene

It is vitally important that personal hygiene is maintained at a high level and that everyone is aware of the consequences should hygiene standards drop. You must ensure that you wash your hands thoroughly using hot water & soap after visiting the toilet, or after soiling your hands

through any means, especially if you are coming into contact with any raw materials, finished or part processed products, or samples. If you think that there is a possibility of contamination do please inform a manager and do not touch any product, materials or packaging, or enter the laboratory or production areas. Always be aware that whatever your task you could be a potential source of contamination, if you do not attend to personal hygiene. Hands should always be washed on entering the production areas at the indicated hand-wash stations.

Visitor & Sub-Contractor Control

Visitors and sub-contractors likely to enter the Production Areas should read carefully, complete and sign the Visitors Questionnaire in reception. The HES employee who admits the visitor into reception should draw the visitors' attention to this questionnaire. The HES employee who is being visited (the host) should read the response and counter-sign. The HES host is responsible for the supervision of all visitors or sub-contractors when on site. No visitors of sub-contractors are to enter the building at any point other than the main reception without prior authorisation from a director of HES.

If any answers to the questionnaire are "yes" – please ask a director or senior manager for further advice. The visitor or sub-contractor that has indicated recent health problems, or has recently travelled to a region where there is a health warning should not be admitted to production areas without reporting to a director of HES.

Health

Because of the dangers of contamination of the product we must ensure that great care is taken in the production areas, so the health of all personnel is of extreme importance.

If you have a stomach or bowel disorder, which leads to vomiting or diarrhoea you should inform your manager and they will advise you on what to do. This is especially important if the sickness has been contracted whilst abroad. In the event of illness from food poisoning or an infectious disease, a doctor's certificate will be required on return to work. For illness which results in more than 3 days absence from work, a sickness self-certificate form should be completed on return to work (Accounts Administrator).

FOOD HANDLERS are required to inform a director or senior manager if any person with whom they share accommodation has been diagnosed with any of the infectious diseases listed on the General Medical Questionnaire, even if the Food Handler is not showing symptoms. As a precaution the Food Handler may be temporarily assigned tasks in which the food we make is not exposed.

It is MANDATORY for all Food Handlers (and recommended for all other employees) that a RETURN TO WORK MEDICAL QUESTIONNAIRE is completed after absence due to illness or foreign travel/holiday.

You should not work on production if you have septic areas on the face, hands, or neck (e.g. septic wounds or erupting boils etc.). All open wounds such as cuts and abrasions should be covered with a clean blue waterproof plaster, which can be obtained from your manager. Do not dispose of it during work period without informing your supervisor so that its disposition is accounted for.

If you need to take any medication during work hours, this must be administered away from the production areas.

If there is doubt about your state of health seek advice and do not take chances.

Food & Drink

Food & drink may be consumed in the canteen & offices only. No food or drink may be taken into the Production Area. Whilst food & drinks may be brought on-site for daily consumption food should not be stored in personal lockers, desks etc. If daily food requires refrigeration please ask the Technologist if it could be temporarily kept in the kitchen subject to available room (the Technologist will discard unused food daily).

Safety at Work

Safety at work is mainly a matter of recognising that there are certain hazards and applying common sense to avoid them. Most accidents are completely avoidable and are usually the result of carelessness stupidity or total disregard of basic rules.

Sources of Accidents.

The most common sources of accidents in the work place can be attributed to one of the following: -

- A fall usually associated with slipping or tripping.
- Lifting objects.
- Collision with objects.
- Those associated with the movement of bulk stores by means of a forklift truck, trolley or sack barrow.
- Misuse of machinery or tools.
- Using defective equipment.

There are other sources or causes of accidents which can occur, and this calls for vigilance by everyone around the work place. If you identify a potential accident source which is not common knowledge it would be worth while discussing it with your manager, an action which may prevent an accident occurring to some unsuspecting person at a later date.

Accident Avoidance

The most common accidents can be avoided if you are aware that these hazards exist and that you take reasonable care. The following basic common-sense rules should assist you to stay safe and accident free.

Take care when crossing wet floors if they cannot be avoided. Areas around sinks can be treacherous at times. If you spill liquid in any area where people walk always ensure that it is cleared up before an accident can occur.
Always look where you are going. Do not assume that passageways are always free of obstacles even if they should be. Conversely, do not block passageways that are meant to be kept clear for pedestrian use.

Always use safe methods when lifting heavy objects, to avoid back injury. Always seek help rather than struggle with an awkward object. Mechanical lifting equipment (e.g. a forklift truck) should be used for large or heavy items.

Always ensure that you can see where you are going when carrying anything especially bulky objects.

In the factory, stores and dispatch areas be aware at all times of Forklift truck movements. If you are driving be aware at all times that other personnel may be in the area in which you are working. Forklift trucks may only be driven by qualified personnel.

When using moving machinery always ensure that any equipment guards are fitted in place and that all safety precautions are followed. Always examine leads of portable electrical equipment for damage before use. Do not use damaged equipment, but report the damage immediately.

Procedure after Accident

If you are unfortunate to have an accident, report the facts to your supervisor. If your accident is serious enough for you to take time off work, attend hospital or consult your doctor make sure that the accident details are recorded in the Accident Book, which is kept in the safe, in the Administration Office.

Minimising Glass Contamination Risk

The risk of glass contamination is significant and unavoidable in our business due to necessary laboratory & still apparatus and materials that can only be stored in glass. Therefore we have robust control procedures in place in the Production Areas. As broken glass can be accidentally transferred into the Production Areas the Glass Quality Management Procedure (QMP)22 Glass Control & Breakage and the Glass Breakage Log QML3.3.8.1 (kept in the Admin Office strong-room) apply to ALL EMPLOYEES and any form of breakage in ALL AREAS of the premises. All employees should familiarise themselves with these documents.

Huw Williams
Managing Director

APPENDIX VI: GLASS POLICY (uncontrolled copy)

QMP22 Glass Control & Breakage

1. Objective

The nature of H E Stringer operations means that complete elimination of glass is not feasible. The company HACCP plan identifies and controls glass & foreign body hazard with the appropriate CCP1. This procedure outlines the controls needed to minimise and to control the risk associated with glass use and accidental breakage. *Note: In respect of this procedure 'glass' includes hard plastics.*

2. Scope

This procedure applies to all production areas where manufacturing & preparation of product is carried out.

3. Responsibilities

This procedure applies to all company employees: Immediate action should be taken by anyone involved in a glass breakage incident. All incidents should be immediately reported to a director of the Company. Specific responsibilities are identified for the Stock Controller (SC), Finance Director (FD), Production Manager (SOM), Production Operative (PO), Director (Dir) & Maintenance Manager (MM).

4. Associated Documents

QML3.3.8.1 Glass Breakage Log

5. Procedures Responsibility

5.5.	Ensure all suppliers are informed of the 'No Glass' policy, exceptions being maintained on a register in the Administration Office and posted clearly for reference at Goods Inwards	SC/FD
5.6.	Notify the SC any receipts of materials in glass not on the exception Register, and quarantine	PDM
5.7.	Raise supplier Non-conformance report for materials delivered in glass containers not on the register	SC
5.8.	Materials accepted in glass containers are stored in a segregated safe in the small materials store	SOM
5.9.	Spare distillation equipment is kept in a locked cupboard in the Production Laboratory and is inspected, signed out and signed on return in the register kept for this purpose in the Lab	SOM
5.10.	Essential glass-ware (containers and still components) are checked before and after each production batch and signed as intact on the HACCP Batch Inspection Sheet	PO

5.11. The production area is checked thoroughly before and after use (lighting – dual lined safety type, equipment control dials – filmed, & insectocutor tubes) PO

5.12. All liquids are filtered at CCP1 directly into food contact packaging in line with the HACCP plan, filter inspection before and after use is critical and signed by the operative on the Batch Inspection Sheet. PO

5.13. In the event of accidental breakage during use, or observed damage on inspection, or glass fragment retained on the filter cease production immediately, report and initiate breakage procedure (below) PO

5.14. Glass containers are **not permitted** in the powdered flavour production area. General area check as in 4.6 above, before and after production. PO

5.15. Essential glass items in the production & warehouse areas are recorded on a register kept in the Admin Office and are checked by weekly audit in line with QMP25 Area Hygiene & Inspection SOM

6. Laboratories

The Flavour laboratory, GCMS room, kitchens, offices and common areas represent very low risk as none has direct access to production areas or exposed product meant for commercial sale – glass is essential to the functioning of these areas, and sample material is presented in glass bottles for preservation. Therefore these areas are not included on the glass register or weekly audit, however the breakage procedure (below) applies and each employee has responsibility for vigilance.

7. Action on Discovery of Glass Damage or Breakage

7.5. Glass damage in production areas discovered during area, equipment & container inspection before/during/after use should be immediately reported to the Senior Operations Manager or Director PO

7.6. Glass damage in other areas should be immediately reported to a Director by the person discovering All

7.7. The production process should immediately cease – if glass damage occurred <u>during</u> production then product should be clearly segregated under QA Hold and a Non-Conformance report made pending a risk assessment by a Director PO

7.8. In the event of glass breaking during production at a level higher than exposed product (fluorescent or insectocutor tubes, still components) then product is to be immediately scrapped & an NCR completed PO

7.9. Follow QMP23 Maintenance of Production Areas & Equipment for sign-off by the SOM or a director prior to re-commissioning the area PO

7.10. Retain sample and complete Glass Breakage Log (Admin Office strong-room)with all details as below SOM/PO

8. Action on Glass Breakage (all personnel, all areas)

8.5. Prohibit traffic through area

8.6. Sweep up all fragments retaining a small sample in a plastic container

8.7. Box & dispose of glass fragments and all utensils used in clear-up, in outside skip
8.8. Check the soles of footwear of all personnel present at the time of breakage or involved in the clean-up
8.9. Enter the breakage on the Glass Breakage Log (Admin Office strong-room), date, label the sample and store with the Register
8.10. Samples are retained for at least 2 years

APPENDIX VII: LIST OF QUALITY SYSTEM PROCEDURES (uncontrolled copy)

1. OBJECTIVE
To describe the correct implementation of procedures by area of operation

2. SCOPE
All procedures issued as part of the Quality System

3. RESPONSIBILITY
The Managing Director or nominated Document Controller is responsible for the company procedures

4. FREQUENCY
Ongoing

5. PROCEDURES

	Department
QMP01 Customer Contract & Review	Sales
QMP02 Document Change & Control	QST
QMP03 Purchasing of Manufacturing Process Material	SC & Technical
QMP04 Product Identification & Traceability	SC & Production
QMP05 Sales Order Processing	Sales
QMP06 Incoming Goods Reception & QC	Production
QMP07 Material Handling & Storage	Production
QMP08 Packaging & Delivery	Production & Sales
QMP09 Manufacturing Process Control	Production
QMP10 In-process & Final Inspection	Production & Technical
QMP11 Control of Non-conforming Material	Production & Technical
QMP12 Non Conformance Reports & Corrective Action	QST & Technical
QMP14 New Product & Process Development	Technical & Sales
QMP15 Customer Complaints	Sales
QMP16 Training of staff	Board
QMP17 Internal Audits of the Quality System	QST
QMP18 Calibration of Critical Measurement Equipment	Technical & Production
QMP19 Quality System Mandatory Records	QST
QMP20 Customer Supplied Materials	Finance & Technical
QMP21 Cleaning of Production Equipment	Maintenance & Production
QMP22 Glass Control, Use & Breakage	Production
QMP23 Maintenance of Production Equipment	Maintenance
QMP24 Customer Enquiry & Sample Request Processing	Sales & Technical
QMP25 Area Hygiene Inspection	Senior Management
QMP27 Handling, Processing & Recording of Organic Products	Production Sales Technical
QMP28 Product Recall	QST
QMP29 Supplier Approval & Review	QST & Technical

Note: There is no QMP13 or QMP26

APPENDIX VIII: COMPLAINTS, NON CONFORMANCE REPORTS & CORRECTIVE ACTIONS PROCEDURE (uncontrolled copy)

1. Objective

This procedure specifies how Customer Complaints, Non-conformance Reports (NCR) and Corrective Action Requests (CAR) are used to achieve improvements to our quality in a controlled, authorised and recorded way.

2. Scope

A Customer Complaint is a communication from a customer that an aspect of HES product or service has failed to meet their expectations. All Customer Complaints result in a Non-Conformance Report.

A Non-conformance is an undesired result of a lapse in our quality procedures, or a situation that we think falls below the standards that we want to attain (standards of consistency, diligence, safety and general quality).

Minor NCRs allowing immediate resolution do not necessarily generate a need for a CAR. Major NCRs and repeated minor NCRs requiring procedural change to the quality system require a mandatory CAR.

Corrective Actions can apply to any part of the Quality System or manufacturing process in order to prevent or repeat a Non-conformance.

NCR/Corrective Actions are likely to result from internal audits, external audits, and complaints from a customer, or to a supplier.

3. Responsibilities

Any team member may receive a Customer Complaint and is responsible for raising the QF08 to record the complaint, forwarding the details immediately to the Customer Service Executive (CSE). Any team member may identify a Non-conformance and report to the Departmental Manager (DM). The DM will raise the NCR and Corrective Action. Approved internal auditors (IA) conduct audits in line with QMP17. The CSE has responsibility for maintaining the Register of Customer Complaints, NCR's & CAR's. The Managing Director (MD) has responsibility for initiating management review and follow-up by the Quality Systems Team (QST). Each Corrective Action will indicate responsibility for implementation.

4. Associated Documents

Customer Complaint, NCR & CAR Documentation Summary	QML3.2.12
QF08 Complaint, NCR & CAR Form	QML3.2.12.1
QR14 Register of Complaints, NCRs & CARs	QML3.2.12.2
QMP09 Manufacturing Process Control	

5. Procedure

		Responsibility
5.1.	Identify and report to the department manager the Non-conformance (occurred/potential) *or -*	All
5.2.	Complete the Internal Audit Report and identify and report to the DM any Non-conformance (occurred/potential)	IA
5.3.	Initiate a detailed Non-conformance Report on form QF08 identifying the action and completion date required	DM/IA
5.4.	Copy QF08 to the MD, TD, FD, PM & CSE	DM/IA
5.5.	Number and enter the NCR/CAR as necessary on the Register	MD/CSE
5.6.	File & number the NCR QF08 in the NCR File	CSE
5.7.	Implement the agreed Corrective Action	DM
5.8.	Review all NCR/Corrective Actions every 2-4 week team meetings	MD
5.9.	Propose any procedural changes to the Quality System for approval & authorisation	QST
5.10.	Report completion of Corrective Action to the MD & QST	DM
5.11.	Finalise & close the NCR	MD
5.12.	File the completed NCR	CSE

APPENDIX IX: RECALL PROCEDURE (uncontrolled copy)

1. OBJECTIVE

To operate an effective, prompt recall procedure in order that out of specification products which have left HES may be retrieved in a controlled manner.

2. SCOPE

The procedure covers all products manufactured and supplied by HES.

3. RESPONSIBILITIES

The Managing Director (MD) is responsible for initiating all recall activities and communicating with customers. The Technical Director (TD) or the Financial Director (FD) will be responsible for co-ordinating recall activities. The Recall Committee (RC) is responsible for assisting the co-ordinator with all aspects of the recall. The Recall Committee will appoint a deputy for each unavailable member. All events regarding a product recall shall be recorded by the Technical Director (TD) or Technical Information Officer (TIO), including all decision dates and times.

4. ASSOCIATED DOCUMENTS

Appendix 1: the Product Recall Committee
QP04 Product Identification & Trace-ability
The Quality Systems Document Register

5. TYPES OF PRODUCT RECALL

The Managing Director will decide the following:

Type 1 – There is a reasonable probability that the defective product will cause serious adverse health consequences or death.

Type 2 - The defective product may cause temporary or medically reversible adverse health or where the probability of serious adverse consequences is remote.

Type 3 – The defective product is not likely to cause adverse health consequences but would adversely affect a customer's reputation.

6. CAUSE OF PRODUCT RECALL

Communication from a Raw Material supplier
H E Stringer corrective action
Customer non-conformance
Government communication

7. PROCEDURE	Responsibility
7.1. A Recall Committee member receives notification of information that may lead to recall establishes the facts and the extent of any complaint and informs the Managing Director	Member
7.2. Key personnel are informed the hazard is investigated, with suspect inventory located and quarantined	RC
7.3. Relevant customers are identified using QP04 Product Identification & Trace-ability.	RC
7.4. Production and analytical records are checked, collated and communicated to the Recall Committee	RC
7.5. The seriousness of the situation is assessed and if necessary a Product Recall is initiated	MD
7.6. The Recall Committee is convened, and co-ordinator and record-keeper appointed	MD
7.7. Relevant customers are notified	MD
7.8. Arrangements are made to uplift & quarantine stock	SOM
7.9. If relevant, production is ceased pending investigation and corrective action	SOM
7.10. Employees are briefed	MD
7.11. HES liability is checked	FD
7.12. Managed wind down to termination of the recall, ensuring resources match exposure at any given point	MD
7.13. Initiate post-recall review within 2 weeks of termination	MD
7.14. File records & minutes for 5 years	TD/TIO
7.15. Test Recall Procedure every 6 months	RC

HES PRODUCT RECALL COMMITTEE

Name, position	**Home [& mobile nos.]**
G H Williams, Managing Director	Contact details held on the Controlled Procedure Copy
K Barker, Technical Director	
M Ford, Technical Information Officer	
L Beesley, Senior Operations Manager	

APPENDIX X: SPECIFIC MATERIAL HANDLING REQUIREMENTS – RISK CONTROL (uncontrolled copy)

1. OBJECTIVE

The following Quality Manual Procedures govern the handling of specific materials with particular handling and segregation issues

2. SCOPE

Raw materials that require special handling requirements to ensure product safety, legality and quality (e.g. known allergens, or certified organic)

The allergen status of raw materials is risk assessed as part of the Raw Material HACCP analysis.

The risk of cross contamination with allergens between finished products is not an issue as all finished product is produced in batches, with thorough and full wet-clean and solvent rinsing/drying of vessels & utensils *between every batch*.

3. PROCEDURES

Click on the hyper-links to access the specific procedures

RAW MATERIALS HACCP CHART

QMP07 MATERIAL HANDLING & STORAGE QML3

QMP21 CLEANING OF PRODUCTION EQUIPMENT & AREA QML3

QMP28 HANDLING PROCESSING & RECORDING OF ORGANIC PRODUCTS QML3

NUT POLICY