

T D BRIDGER LIMITED

QUALITY MANUAL

BRCGS PACKAGING MATERIALS ISSUE 6

FSC® CHAIN OF CUSTODY CERTIFICATION STANDARD
FSC-STD-40-004_V3-0

Avenue One
Letchworth
Hertfordshire
SG6 2WP

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APPENDICES

For the purpose of the Company Quality Management System the following definitions also apply:

THE COMPANY

T D Bridger Limited, trading as Bridger Packaging.

QMS

The Quality Management System used within the Company, supplemented by hygiene requirements, in order to produce safe and legal products. It has been designed to meet the requirements of the BRC Standard and the FSC Standard.

BRC STANDARD

The standard fully known as the BRCS Packaging Materials Issue 6.

FSC STANDARD

The standard fully known as the FSC Chain of Custody Certification Standard with a reference of FSC-STD-40-00_V3-0 supplemented by normative documents as laid out in Table A of the Standard.

QUALITY DETERMINING

Quality determining purchases are products or services used by the Company that form part of, or come in direct contact with, finished goods and where there is a potential to impact on the safety, quality or legality of our products. Consumable items are not included.

CATEGORY

An indicator of which product group packaging manufacture by us is deemed to fall into. Product groups are defined as :

- Category 0 Pharmaceutical packaging materials for medicinal products
- Category 1 Packaging that comes into direct contact with food products or other designated hygiene-sensitive products
- Category 2 Packaging for all other products including secondary and tertiary packaging for all uses.

DEPARTMENT MANAGER

The term Department Manager refers to any or all of the following:

- Sales Director
- Production Manager
- Operations Manager

AUTHORISED BUYER

An employee holding one of the following job titles granted permission by a Company Director to purchase Quality Determining goods or services:

- Managing Director
- Production Manager
- Operations Manager
- Quality Control Manager
- Production Assistant
- Maintenance Supervisor

QUALITY MANAGER

An employee who is responsible for the day-to-day running of the QMS and compliance with the FSC Standard. This position is currently assigned to the Operations Manager. He is also the Management Representative for the FSC Standard.

BRC MANAGER

An employee who is responsible for the control of the BRC Standard. This position is currently assigned to the Production Manager. His deputy is the Quality Control Manager.

OPM

The Company's Operating Procedure Manual.

SAFETY COMMITTEE

A committee, chaired by the Production Manager, consisting of the Operations Manager and every Supervisor. This Committee, which encompasses all sub-cultures within the organisation, provides a forum for consultation between management and employees on all aspects of health, hygiene and safety. All members are focused on making sure packaging we make is food safe where necessary.

SPECIFIED REQUIREMENTS

Requirements for final product that meets a customer's quality requirements while conforming with the Company's

mission statement on producing safe, and legal products.



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It is the Policy and Mission of T D Bridger Limited to:

- **Maximise customer satisfaction through timely delivery of commercially acceptable product that meets customer requirements at a competitive price.**
- **Continually improve the effectiveness of the Quality Management System.**
- **Produce safe and legal products that comply with applicable legal requirements.**
- **Conserve resources, encourage recycling and to reduce waste, emissions and energy consumption.**
- **Promote ethical business practice, ensure equal opportunities and provide a safe and healthy work environment by complying with the base code of the Ethical Trading Initiative.**

L D Bridger ACA
Managing Director

A division of T D Bridger Limited
Registered in England No. 366193
Registered office as above

GENERAL REQUIREMENTS

The Company has made a strategic decision to implement a QMS to help improve its overall performance and provide a sound basis for sustainable development initiatives. The Company's goal is to consistently provide products and services that meet our customer's requirements and that also comply with any applicable statutory and regulatory requirements. A Quality Policy & Mission Statement, shown in Section 3, has been formulated and it was decided to seek certification under both the BRC Standard and FSC Standard, in order to assist in achieving these goals.

The Company has established, documented, implemented and maintains a QMS designed to conform to the requirements of both the BRC Standard and the FSC Standard. The Company has adopted a risk based thinking approach in order to determine the factors that could cause any deviation from planned results. Senior management have identified risks and opportunities and are committed to maintaining a hazard and risk management system. All risks identified that affect our product quality, our customers, our employees and even end users of our products are considered and reviewed on a regular basis. In addition the Company's standing in the eyes of the community at large is also considered with regard to developing and maintaining good ethical, environmental and sustainable practices. Preventative controls are implemented to minimise any possible negative effects on the products and services that we supply and on the QMS. This approach also enables us to maximise opportunities as they arise.

The Company considers the intended use of all packaging it produces and allocates each product into one of three categories which are shown in Appendix F. Each category has been risk assessed to determine any specific restrictions on materials or addition process checks that need to be performed in order to produce safe and legal products that will meet customer's requirements. The Company also considers that all the products that it supplies are split into four product groups for the FSC Standard. These FSC product groups are shown in Appendix A. It endeavours to continually improve its effectiveness in accordance with the requirements of all the above standards. Specifically the Company has identified the processes needed for the QMS and their application throughout the Company. Appendix B shows the sequence and interaction of these processes together with the Section numbers within the OPM that are applicable to ensure that both the operation and control of these processes are effective, and that they can be monitored, measured (where applicable) and analysed. The introduction of raw materials, including the use of post-consumer recycled materials, is also shown in Appendix B

A multi-disciplinary Safety Committee has been established and they are backed by external expertise when considered necessary. They are led by a person suitably trained in hazard analysis and risk management techniques. The team are responsible for reviewing and identifying critical control points within our system and assessing the following areas: microbiological, foreign objects and chemical (e.g. taint, odour, allergen, component transfer) contamination, legality and defects critical to consumer safety of products manufactured by the Company. They also evaluate the risk management system for its effectiveness. The Chairman will keep the Safety Committee members up to date with both factory changes, customer requirements relevant legislation and codes of practice applicable to our industry.

The Company has established, implemented and maintains procedures and work instructions covering all aspects of the FSC Standard, together with personnel responsible for each procedure and their training required. The Company declares that it is not knowingly directly or indirectly involved in the following activities:

- Illegal logging or trade in illegal wood or forest products.
- Violation of traditional and human rights in forestry operations.
- Destruction of high conservation values in forestry operations.
- Significant conversion of forests to plantations or non-forest use.
- Introduction of genetically modified organisms in forestry operations.
- Violation of any of the ILO Core Conventions, as defined in the ILO Declaration on Fundamental Principles and Rights at Work, 1998.

DOCUMENTATION REQUIREMENTS

The documentation exists as three main levels:

- This Quality Manual.
- Operating or Management Procedures that span the full range of quality related activities. Together these comprise the Operating Procedures Manual (OPM). The OPM is supplemented by the Opportunity and Risk Management Manual (ORMM).
- The Systems Manual, such as Machine Set-Up Instructions, Maintenance Instructions, Colour Matching Instructions, Packaging Specifications and Test Methods Manual (TMM).

The Quality Manual is issued in two forms:

- As a document located on the Company's web site (www.bridger.co.uk) for both existing and potential customers to view.
- As an internal PDF file for the use of the Company's employees.

All documents determined by the Company as necessary for the planning and operation of the QMS are identified and controlled. These documents are reviewed and approved before issue. Procedures exist to ensure that only the latest approved issues are in use, and that pertinent issues of necessary procedures are available where required. In addition, procedures exist for the control of obsolete documents. All these procedures cover printed, typed or computerised documents or data.

All records are legible and in a clear and unambiguous form. They are securely stored, but are readily accessible as and when required. Full details, including the different types of record and their minimum retention times, are contained in documented procedures. Records are kept to demonstrate that:

- Specified requirements have been met for each customer order and delivery, and if there is a non-conformance, the corrective actions taken.
- Company products are traceable to all raw materials and throughout all stages of production and distribution to customers. They are also traceable to quality records.
- The QMS has been operated as planned.

MANAGEMENT COMMITMENT

The Managing Director is committed to the development and implementation of the QMS and to continually improve its effectiveness. This is illustrated by the establishment of the Quality Policy, regular communication to employees of the importance of meeting customer requirements, legal requirements and the establishment of quality objectives. The Managing Director also chairs management reviews and ensures that appropriate resources are available.

CUSTOMER FOCUS

The Managing Director is instrumental in ensuring that procedures are in place to ensure that customers' requirements are both determined and met with the aim of enhancing customer satisfaction.

QUALITY POLICY

The Managing Director has defined and documented the Quality Policy & Mission Statement for the Company, which is shown in Section 3. This Quality Manual and other documented procedures and instructions describe how this policy is put into effect. This includes the keeping of records to demonstrate that we have achieved the required policy, that our quality system has been operated as laid down, and that it has been subjected to the required internal audits and review. In addition our QMS provides a framework to establish and review the Company's quality objectives. Adherence to this policy requires a company-wide approach as it covers almost every aspect of our business. This policy must be understood and acted upon by everyone concerned, and it is made known to all members of the company through:

- Permanent display on all main notice boards.
- Company training programmes, including induction training.
- Internal quality audits, the summarised results of which are subject to management review.

PLANNING

The Managing Director has ensured that quality objectives, including those that are needed to meet requirements for product, are established at relevant functions and levels within the Company. These objectives are measurable and consistent with the Quality Policy.

At Management Review meetings quality planning is performed to improve the effectiveness of the QMS and to ensure that any changes made do not affect the integrity of the system.

RESPONSIBILITY, AUTHORITY AND COMMUNICATION

The Managing Director is ultimately responsible for the quality of all products and services supplied by the Company. In consultation with senior management he authorises changes to the Quality Policy, objectives and the QMS. All of the Company's employees are involved in the QMS and can assist the Company in meeting its quality objectives. Specific areas of responsibility are covered within the OPM. Line of authority and interrelation of all personnel are shown on the Organisation Chart (Appendix D).

The Management Representative has full responsibility and authority from the Managing Director to ensure that the requirements of the QMS are established, implemented and maintained. The Management Representative reports on the performance of the system and any need for improvement, as part of the Management Review. It is the responsibility of the Management Representative to promote the awareness of customer requirements throughout the Company. The Management Representative is also responsible for liaison with any external party on matters relating to the QMS. The BRC manager has specific responsibility for the implementation and monitoring of the BRC Standard. The Managing Director communicates the effectiveness of the QMS via senior management and the Management Representative.

MANAGEMENT REVIEW

The QMS is reviewed at least annually by means of a minuted review meeting chaired by the Managing Director. The review assesses the QMS for its continuing suitability, adequacy and effectiveness in satisfying all the requirements of the standards that make up the QMS together the Company's Quality Policy and objectives. Opportunities for improvement to the QMS and the need for any changes are also considered. All senior managers attend the meeting, plus co-opted members as required. In case of special needs the Managing Director may call an extraordinary meeting. The agenda will vary according to circumstances, and is detailed within the OPM. The Management Representative is secretary to, and prepares minutes of, the meeting.

PROVISION OF RESOURCES

The Company has determined and provided resources needed to implement and maintain the QMS. A monitored maintenance program is in place to ensure the site, utilities to and within the site and machinery and equipment are maintained to an appropriate standard in order to effectively control the risk of contamination, reduce the potential for breakdown and to minimise the risk to products quality, safety and legality. Manufacturing machinery is operated to agreed procedures and instructions, by trained and conscientious employees, in a suitable environment. Emphasis is placed on ensuring that all resources, whether they are buildings, plant, fixtures or equipment, are procured and maintained to ensure a high level of hygiene, and subsequently minimisation of contamination risk, within the Company. All new installations of equipment will be properly specified prior to purchase and be of suitable design so that it can effectively be cleaned and maintained. It will also be tested and commissioned prior to use in a production environments and a maintenance programme established. Security and access control ensure only appropriate personnel are admitted to sensitive areas of the premises and that contamination risks are minimised. Factory layout, process flow and personnel movement is such that product contamination is prevented and compliant with relevant legislation.

HUMAN RESOURCES

The Company seeks to develop and maintain a high level of quality and hygiene consciousness within the organisation and to ensure all personnel have the appropriate training, skills and supervision for their individual roles within the quality system. Personnel performing work affecting conformity to product requirements are competent on the basis of appropriate education and training together with relevant skill and experience. Each Department Manager, together with the Management Representative, is responsible periodically for identifying training needs in his/her department, and providing for the training of all personnel, who manage, perform or verify work-affecting quality. They are also responsible for ensuring that personnel with the appropriate level of training and skills only carry out specific activities, which affect quality and that those personnel are aware of the relevance and importance of how they contribute to the company's quality objectives. Details of training experience are held in computer files. This programme of identification and training is also reviewed and evaluated, in summary, at the Management Review. In addition, the Management Representative has responsibility and authority to ensure that trained personnel, who are independent of direct responsibility for the work being performed, carry out internal quality audits.

A high level of personal hygiene is expected by all personnel, including agency staff, contractors and visitors to the production area in order to minimise the risk of product contamination and health conditions likely to adversely effect product safety are monitored and controlled. Suitable protective clothing is worn where deemed appropriate to minimise the risk of product contamination.

All managers within the company shall ensure that any absenteeism is dealt with and that any key staff are covered by suitable replacements.

INFRASTRUCTURE

The Company has determined those resources that are needed to achieve conformity to product requirements, including buildings, workspace and associated utilities, equipment used in product manufacture and supporting services. Computer systems are held in a secure environment, adequately controlled and regularly backed up. Back ups are held in a fireproof location on-site and are also maintained off-site for further protection.

WORK ENVIRONMENT

The Company has taken into account the work environment needed to ensure the risk of contamination is minimised. Procedures are in place to ensure adequate space, layout and process flow in order to prevent any cross-contamination and that the staff facilities are sufficient for the number of personnel. In addition, housekeeping and cleaning procedures ensure that the environment is suitable for the production of direct food contact product. Facilities are provided for the storage and disposal of product and other waste. A preventative pest control procedure is in place covering the entire site This is regularly maintained.

PLANNING OF PRODUCT REALIZATION

The Company has planned and developed the processes needed for product realization, which are consistent with the requirements of other processes of the QMS. Consideration is given to:

- Any existing documented procedures that form an integral part of the quality system.
- The identification and acquisition of any controls, processes, equipment (including monitoring and measuring equipment), fixtures, resources and skills that may be needed to achieve the required quality.
- Ensuring the compatibility of the production process, installation, servicing, inspection and test procedures and the applicable documentation.
- The updating, as necessary, of quality control and testing techniques, including the development of new instrumentation.
- The identification of any measurement requirement involving capability that exceeds the known state of the art, in sufficient time for the needed capability to be developed.
- The identification of suitable verification at appropriate stages in the realisation of product, the clarification of standards acceptability or all features and requirements, including those that contain a subjective element.
- The identification and preparation of quality records.

CUSTOMER-RELATED PROCESSES

The Company has in place processes that determines customer needs and expectations with regard to quality, safety and legality and ensure that these are fulfilled. The sequence of events, from receipt of an order, through to its acceptance and processing is defined in the OPM. Within these procedures, steps are taken to ensure that:

- The Company determines requirements related to the product for each order received from a customer.
- All requirements are reviewed and defined prior to the Company's commitment to supply product and that these are agreed with the Customer.
- Any new specified requirements differing from those originally on offer are resolved.
- The company has the correct raw materials, trained operators, suitable production and appropriate systems and procedures for the order to be completed. If the required capability to produce the order is not immediately available, action must be taken to acquire it, to re-negotiate or decline the order.
- That legal requirements applicable to the product can be met.
- All orders are acknowledged.
- Records of every review are kept.
- Customer complaints are recorded, handled effectively and feedback is given to the customer in a timely manner. Analysis of complaints is used to reduce complaint levels.

DESIGN AND DEVELOPMENT

All design and development work performed is at the express request of customers. The sequence of events, from receipt of an order, through to the approval of design work, including artwork, is defined in the OPM. Within these procedures, steps are taken to ensure that:

- The Company determines requirements related to the design and development of product for each order received from a customer.
- Artwork and pre-press processes are managed to eliminate loss of information. Proofs are agreed by the customer before any work starts to ensure the information is correctly reproduced to the customer specification.
- Any new specified requirements differing from those originally on offer are resolved.
- Appropriate records are kept.

PURCHASING

It is Company policy to ensure that only approved suppliers are used to provide Quality Determining raw materials and services. An Approved Suppliers List is maintained, backed by evidence of quality assurance approval. Suppliers are only included on this list if they are capable of meeting our specified requirements and they do not compromise the quality, safety or legality of our product. Purchase orders can only be placed with suppliers on the Approved Suppliers List. The Approved Suppliers List is maintained on a computer system and periodically updated from records of supplier performance and supplier complaint procedures.

Some other services are outsourced that have a direct impact in our ability to conform to the requirements of our QMS. These include, for example, pest control and calibration services. Where these have been identified they are also subject to approval and monitoring on the basis of risk. Further details can be found in Section 2 of the OPM.

PRODUCTION AND SERVICE PROVISION

All operations related to the production planning and manufacture of product are carried out under controlled conditions. Various documents lay down procedures for planning and manufacturing product through the plant, for monitoring of products and processes, for compliance with specifications and standards, for criteria of workmanship and for the degree of inspection and testing required. These include:

- Detailed instructions for the choice of raw materials (including FSC certified product if applicable), and for the manufacture, inspection, testing and packaging of every job. This includes tooling such as printing plates and die formes.
- General procedures for plant operations, which are laid down in OPM section 4.
- More detailed technical and work instructions such as Machine Set-Up and Running Instructions, Colour Matching Instructions, Packaging Specifications and Maintenance Instructions. These documents are held separately from the OPM. Further instructions for maintenance and operator instructions are held in machine manuals for each machine.
- The availability and use of monitoring and measuring equipment as detailed in the Test Methods Manual.

Where results of processes cannot be fully verified by subsequent monitoring or measurement of the product, qualified operators will carry out processes, to ensure contract requirements are met.

Procedures exist to ensure that incoming goods are checked for contents, packaging integrity and potential contamination. All products are identified and traceable through all stages of production from receipt of incoming materials or outwork, to delivery of finished cartons and vice versa. Planning and other procedures also ensure that individual jobs have a unique identification. This is traceable back to retained customer orders and artwork, and to individual raw material batches and related test and other data, including printing plates and die formes. Systems are provided to establish and identify the inspection and test status of product from raw materials through to their finished state. This includes procedures for identification and release of conforming items and who has the responsibility and authority for this.

Special arrangements are made for all materials supplied by customers and intended for use in manufacture or incorporation in product supplied to them. This ensures that:

- Their materials are verified or inspected against requirements on receipt.
- Only used in the product(s) for which they were intended.
- The customer is informed of any materials which fail receiving inspection or which are scrapped, damaged or lost at more than reasonable wastage rates.
- All surplus stocks are disposed of as intended.

If supplied product is found not to meet specified requirements at the goods inwards or any later stage, we are still required to produce cartons to the original specified requirements unless a customer concession has first been obtained.

Transport, storage and distribution of raw materials and finished product is undertaken in order to to minimise the risk of contamination or malicious intervention, and to protect product safety, quality and legality. As the Company's product is also used in the food and pharmaceutical industries, special hygiene regulations are enforced and monitored. Details are contained within documented procedures.

All practicable steps are taken to identify, avoid, eliminate or minimise the risk of foreign body or chemical or biological contamination. Samples of products are kept for a minimum of one year, together with their associated production records. This period can be varied on request by customers.

A Statement of Compliance is included as Appendix E to this manual.

CONTROL OF MONITORING AND MEASURING EQUIPMENT

The Company has determined what monitoring and measuring is needed, and what equipment is required to provide evidence of product conformity to determined requirements. Documented procedures exist to ensure monitoring and measuring equipment is suitable for its intended purposes and are calibrated or verified, or both, to agreed procedures and schedules.

All such equipment is clearly identified and is regularly checked and calibrated or verified to ensure their continuing effectiveness. Records are kept of calibration requirements and procedures. All equipment is selected for their suitability and precision in measuring the particular property under test. Adequate steps are taken to ensure that the handling, preservation and storage of all items is such that the accuracy and fitness for use is maintained, and that these items are safeguarded from adjustments which would invalidate the calibration setting. Master equipment is certified and traceable to National Standards.

GENERAL

The Company has planned and implemented monitoring, measurement, analysis and improvement processes to demonstrate conformity to product requirements, conformity to the QMS and to continually improve the effectiveness of the QMS.

It is the intention of the Company to optimise quality and production costs by emphasising prevention of defects rather than inspection of products. Nevertheless we inspect and check raw materials and services, in-process work, and finished goods, against pre-determined standards and specifications. The Quality Control Manager has identified applicable methods, including any appropriate statistical techniques, and the extent of their use.

MONITORING AND MEASUREMENT

As far as is possible within acceptable practices, the Company monitors information relating to customer perception as to whether the Company has met their requirements in order to measure the performance of the QMS.

Periodic internal audits are performed to ensure that the QMS conforms to planned arrangements, the BRC Standard and the Company's documented procedures. These audits are carried out to a fixed schedule, which is prepared by the Management Representative and confirmed at the Management Review. The Management Representative appoints internal auditors who are independent of direct responsibility for the work under audit. Training is carried out where necessary. A summary of audit test results is evaluated at the Management Review. In addition the Company will ensure that the most senior production or operations manager shall participate in the opening and closing external audit meeting and that relevant departmental manager, or their deputies, are available as required during external audits. Root causes of non-conformities identified in any previous external audits will be effectively addressed to prevent recurrence. All other non-conformities identified will be closed out with consideration to the root cause.

The Company monitors and measures QMS processes. When planned results are not achieved, correction and corrective actions are taken, as appropriate to ensure conformity of the product.

In order to ensure that product requirements are met, the Company inspects and tests the product during the various stages of its travel at arrival on site and throughout production. Records are kept which show that such inspection and testing has been performed and who has authorised the release of product. Unless specifically requested by a customer no work is released without authorisation. To the greatest possible extent principles of operator inspection and control are followed, but supplemented by patrol inspections and any required special tests. Details are contained within OPM section 4 and section 5.2 and in the Test Methods Manual. Where necessary instructions drawn up by the Quality Control Manager denote the sampling frequency and plan, and any special tests required. In-process work is only released for the next production stage when:

- It has received positive clearance under all inspection and testing required so far, or
- The stack has been marked for defective material but procedures provide for more detailed inspection and sorting at a later production stage, or
- It is released under a Positive Recall Procedure. Documented procedures state that the Production Manager has the authority for this. At all stages, non-conforming product is identified.

Final inspection includes verification that all earlier inspections and tests required by the quality plan have been completed and cleared, and that the carton batch conforms to specified requirements. This includes confirmation that the necessary records have been kept.

CONTROL OF NONCONFORMING PRODUCT

Product, which does not conform to specified requirements at any stage of production, is identified as such and segregated and controlled to prevent inadvertent further processing or despatch. Procedures are enforced so that nonconforming product is re-worked to meet specified requirements, or accepted, with or without repair, by customer concession, or rejected and scrapped. Any items reworked are re-inspected according to laid down procedures. Procedures state who has responsibility and authority for this, and how records are kept. Systems are in place to effectively manage product recalls and returns from customers so that the hygiene, safety, quality and legality of our products are controlled.

ANALYSIS OF DATA

The Company collects and analyses data in order to measure the effectiveness and suitability of its QMS. This data is used to help consider if continual improvement of the effectiveness of the QMS can be made. Data from all sources may be used to provide specific information as to customer satisfaction, conformity to product requirements, characteristics

and trends of processes and products including opportunities for preventive action and suppliers.

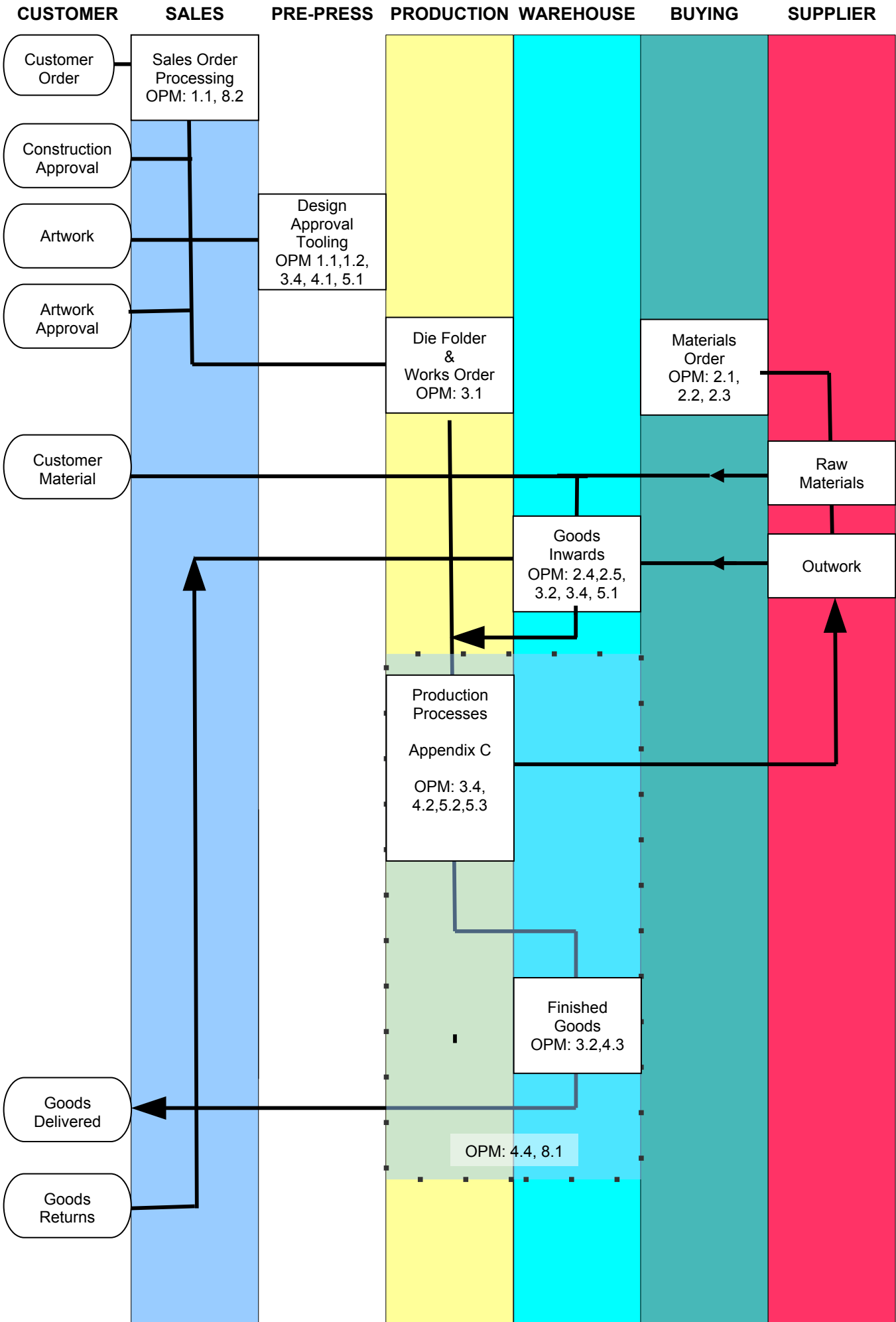
IMPROVEMENT

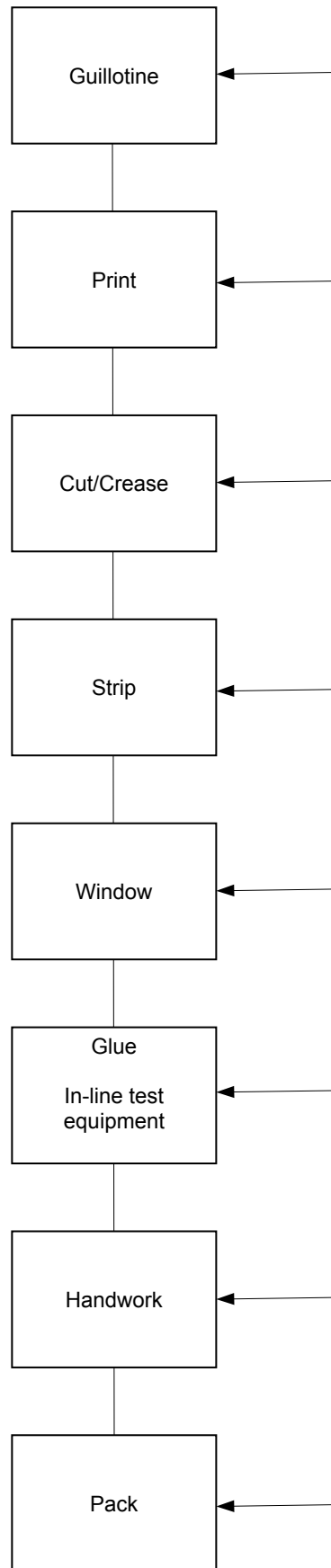
The Company strives to improve the effectiveness of the QMS by reviewing the quality policy, quality objectives, audit results, analysis of data, corrective and preventive actions and management review. The Company has established, documented and maintains procedures for implementing corrective and preventative actions. These actions are appropriate to the magnitude of the problems and commensurate with the risks encountered. Procedures for corrective actions ensure that there are effective handling of both customer complaints and reports of product non-conformities; that the causes are investigated and corrective actions determined to eliminate these; that these are effectively taken and reviewed in order to reduce complaint levels. Procedures for preventive actions ensure that these are properly determined and planned, and that an appropriate person is given responsibility for carrying them out. These are minuted and reviewed at subsequent meetings until complete. Management review includes checks for any applicable updates to legislation, scientific or technical developments, industry codes of practice and any changes to the standards applicable to the QMS.

FSC Product Group	Product Type and Code	FSC Claim	Input Material Category(ies)	Control System for FSC Claim	Sites
Uncoated paperboard	P3.1	FSC Mix x% FSC Mix Credit FSC Recycled x% FSC Recycled Credit	FSC Mix x% FSC Mix Credit FSC Recycled x% FSC Recycled Credit	Transfer	Avenue One Letchworth Hertfordshire SG6 2WP
Coated paperboard	P3.2	FSC Mix x% FSC Mix Credit FSC Recycled x% FSC Recycled Credit	FSC Mix x% FSC Mix Credit FSC Recycled x% FSC Recycled Credit	Transfer	Avenue One Letchworth Hertfordshire SG6 2WP
Paperboard packaging	P5.1	FSC Mix x% FSC Mix Credit FSC Recycled x% FSC Recycled Credit	FSC Mix x% FSC Mix Credit FSC Recycled x% FSC Recycled Credit	Transfer	Avenue One Letchworth Hertfordshire SG6 2WP
Microflute packaging	P5.2	FSC Mix x% FSC Mix Credit FSC Recycled x% FSC Recycled Credit	FSC Mix x% FSC Mix Credit FSC Recycled x% FSC Recycled Credit	Transfer	Avenue One Letchworth Hertfordshire SG6 2WP

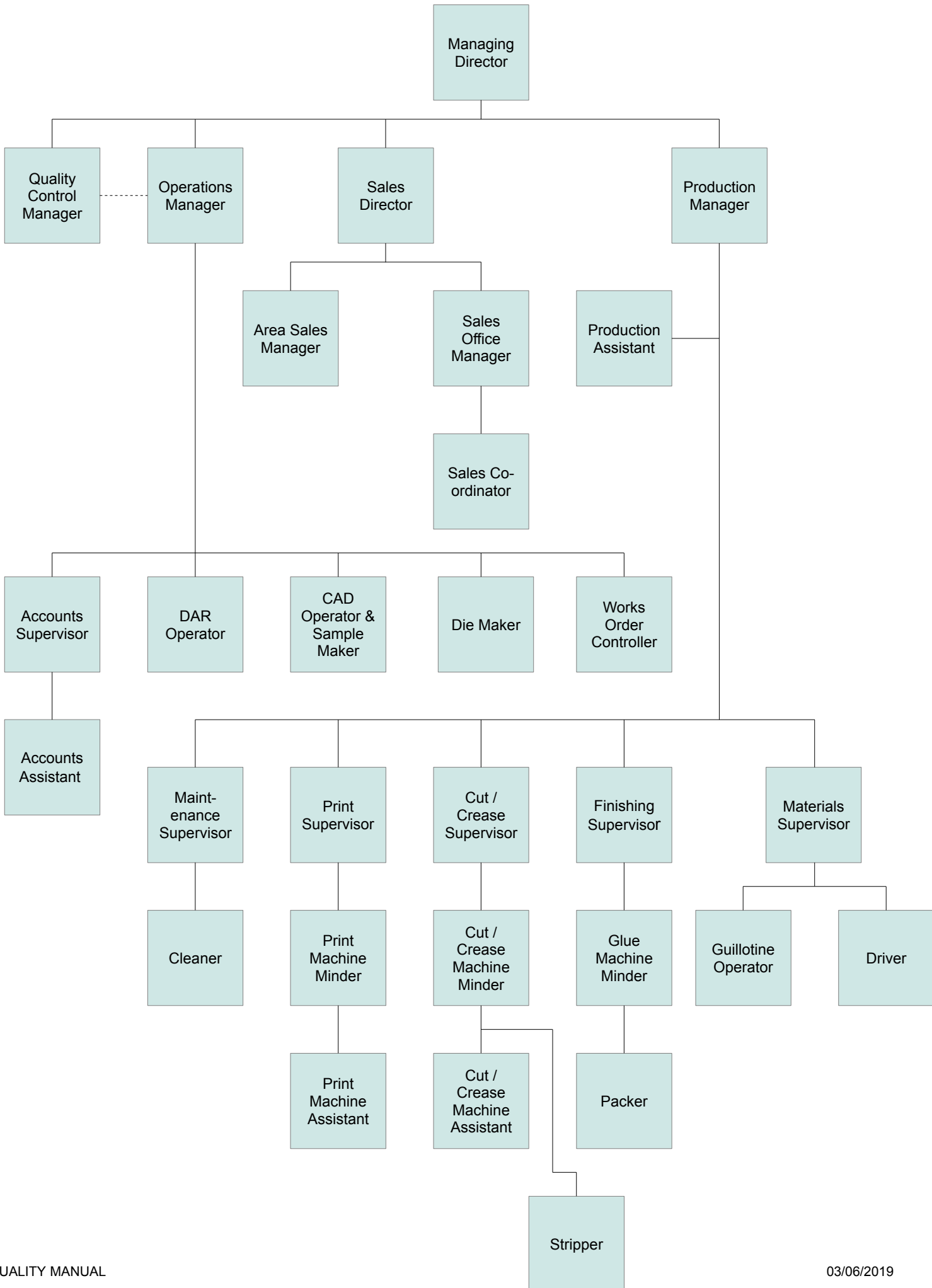
Claim Period

All claims are based on a job order basis.





This process flow diagram is applicable to all product Categories, however not all process necessarily apply to every order. The usual order is from top to bottom, but products may be processed in any order. Rework may apply from any operation.





STATEMENT OF COMPLIANCE AS AT 20th DECEMBER 2019

MANUFACTURER

Bridger Packaging whose address and manufacturing premises are shown to the right.

Avenue One
Letchworth
Hertfordshire
SG6 2WP

PRODUCT DESCRIPTION

Printed folding cartons and other packaging manufactured from paperboard. The paperboard used may contain post-consumer recycled materials. The sheets of paperboard may be enhanced by surface application of one or more of the following materials:

- Printing Ink
- Varnish
- Lamination
- Coloured Foil
- Window Film

Telephone 01462 636465
Email sales@bridger.co.uk
Web www.bridger.co.uk

The paperboard is then cut into the required shape as necessary and may then have an adhesive applied in order to create certain types of finished product if required.

Consideration is given to both customer's requirements and the final use of products supplied.

Appendix F gives more information of Product Groups and shelf life of packaging produced.

COMPLIANCE

All articles manufactured as suitable for high hygiene risk use comply with Article 3.1 of Regulation (EC) No 1935/2004.

All articles manufactured as suitable for high hygiene risk use comply with Annexes 1 and 2 of the CEPI Food Contact Guidelines for the Compliance of Paper & Board Materials and Articles 2019. A copy can be viewed here: http://www.cepi.org/system/files/public/news_items/Food%20Contact%20Guidelines_2019.pdf

All items manufactured by us are in accordance with European Carton Makers Association Food Safety Good Manufacturing Practice (v1.1).

All items supplied by us comply with the BRCGS Packaging Materials (Issue 6).

Our products are defined as articles under Regulation (EC) No 1907/2006 of the European Parliament and of the Council of 18 December 2006 concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) – as amended. REACH requires suppliers of articles to inform their customers of the presence of substances of very high concern (SVHC) included in the candidate list above a concentration of 0.1% weight by weight (w/w) or that are intended to be intentionally released. Products that we supply do not fall into either of these two categories and are thus not covered by REACH registration or notification.

All products supplied should be kept in original storage containers or materials supplied until their use is imminent. Goods should be stored in conditions appropriate to their end use. Goods not supplied as suitable for high hygiene risk use should not be used for high hygiene risk final applications. Goods should be used within six months of their date of manufacture. Goods supplied that have decoration added must not be used where the decoration would come into direct contact with the product.

All products supplied and materials used meet at least minimum relevant legal requirements in the UK.

A division of T D Bridger Limited
Registered in England No. 366193
Registered office as above

PRODUCT GROUPS

We are manufacturers of printed and plain folding carton board packaging. Our packaging expertise also extends to trays, blister cards, microflute cartons and shelf-ready retail displays. In addition, our capabilities cover other packaging products made from paperboard and corrugated microflute. A wide variety of finishes are available to compliment our ability to print in multiple colours. These include satin, matt and gloss varnish combinations (water based or UV) together with embossing, hot foil stamping and film windows. We also have the in house ability to offer sequential numbering of cartons for promotions etc.

We manufacture safe and legally compliant products that meet the minimum legal requirements in the country of manufacture and, where known, the country of their intended use, as well as meeting the requirements of our customers.

All our products are manufactured under the requirements of the BRC Standard. This standard:

- is intentionally recognised, GFSI-benchmarked and provides a report and certification that can be accepted by customers in place of their own audits, thereby reducing time and cost
- provides a single standard and protocol that governs an accredited audit by third-party certification bodies, allowing a credible independent assessment of a company's safety and quality systems
- is comprehensive in scope, covering areas of quality, legality and product safety
- assesses part of the legislative requirements of the packaging manufacturer/supplier, packer/filler and retailer
- demonstrates a commitment to the prevention of loss of raw materials that may contaminate the environment
- provides a framework for the development of quality and hygiene management systems, encourages continual improvement, effective environment monitoring, reduction in waste and increased efficiency.

We manufacture in a secure, well maintained and hygienic environment and where possible to the guidelines laid out in the to the European Carton Makers Association Good Manufacturing Practice Guide v1.1 available to be viewed here:

<https://www.ecma.org/uploads/Bestanden/Publications/GMP/UK%20GMP%20%20Version%201.1%20%2016%2012%202013%20%20-%20FINAL.pdf>

Depending on the anticipated end use of the packaging that we produce, each product that we manufacture is placed into one of 3 categories. These categories have been defined by our Safety Committee who have determined the differing requirements with regard to the environment that the cartons are produced in, the materials used in production and the level of testing, hygiene and quality checks that are applied to product in each group based on hazard and risk assessment principles. Each category is explained below.

Every Order Acknowledgement and constructional drawing send out for approval will indicate which product group the product is deemed to fall into. If you think this is incorrect, please notify a member of our team and we will re-designate the product as required.

Our product categories are shown on the next page.

CATEGORY 0

Pharmaceutical packaging materials for medicinal products.

Gang printing (the process of printing more than one design on a substrate at one production run) is recognised and classified as an acute contributory risk relating to admixtures. Therefore this shall only be permitted in agreement with the customer and on completion of a documented risk assessment to evaluate and mitigate the risk of cross-contamination.

Where Braille is included in the product design, there shall be a formal documented procedure for ensuring the Braille text and orientation are correct and comply with the specifications for size, position and embossed height.

For the production and processing of primary packaging materials, operator clothing shall include protective garments, hair covering and where applicable facial covers.

CATEGORY 1

Packaging that comes into direct contact with food products or other designated hygiene-sensitive products.

Cartonboard will only be sourced that is suitable for direct contact with dry, non-fatty foodstuffs. All inks and varnishes used will have low migration properties unless specifically agreed on a product by product basis with each customer. Production personnel involved in the final packing of product are required to wear food hygiene grade jackets that completely cover the upper torso and arms.

Window film suitable for direct food contact will be used, if required.

CATEGORY 2

Packaging for all other products including secondary and tertiary packaging for all uses.

All other products not falling into a previous category.

All product is individually inspected by a colour camera system where possible that ensures:

- product is not mixed in outers
- all colours are printed and are within register tolerance
- cut and crease is accurate to print decoration

PAPERBOARD PACKAGING – SHELF LIFE

The performance and appearance of paperboard packaging will deteriorate over time. There are a number of factors which determine the length of time that a carton remains useful. These include:

The end use of the product

Cartons that contain absorbent products are more likely to pick up taint and odour from the materials used in the manufacture of the packaging. Likewise there may be migration from the packaged product to the packaging causing discolouration or structural failure, especially of oils and fats from greasy products. Extreme heat or cold may also affect the performance of the packaging.

Method of erection and filling

Pre-fold of creases on a carton deteriorate over time. This is relevant in cartons side seamed by the carton maker and refers to the ease of opening the carton on the packaging line. It is controlled by the creasing, by pre-folding of the unfolded creases and by the pressure applied to the folded creases by the draw rolls on the gluing machine. The opening force measured directly at the gluer is critical, because subsequent tightness of packaging and storage conditions will cause this force to increase with time. It can be checked by measuring the height of a fixed number of cartons (the “bounce” feature). It is recommended that the storage of side-seamed cartons should not exceed three months for optimum packaging line efficiency.

Printing inks

All pigments used in printing inks fade over a period of time. Different pigments used to colour different inks will also fade at varying rates. This is normally only an issue once the carton has been filled and is on display as product wrapped or boxed and protected from a direct light source is unlikely to deteriorate by any appreciable amount.

Coatings and varnishes

All coatings and varnishes will deteriorate over time. Most varnishes will be affected by light once in use and will tend to yellow with age. Barrier coatings can also be affected by temperature and humidity and their effectiveness will also degrade over time.

Paperboard substrate

China clay coatings used on paperboard have a tendency to dis-colour when exposed to light. Similar to varnishes there is a tendency to yellow with age. Paperboard is sensitive to changes in humidity. Paperboard is manufactured to be flat in a defined environment of 50% relative humidity at 20 °C. Exposure to variations of humidity will result in a change of paperboard shape or dimensions. Drying out will make the paperboard more brittle. Most paperboard manufacturers recommend conversion within one year of manufacture.

As can be seen there are so many variables that can affect the life of paperboard packaging and we recommend that each paperboard packaging user conducts their own trials as to conformance of the longevity expected. If paperboard packaging is kept in its original outer packaging and the storage conditions are maintained as indicated above and is filled within 3 months of production (if using automated packing lines) or 6 months otherwise, and is not on display for more than 6 months thereafter then there is unlikely to be any noticeable deterioration of the packaging.

Records of production, production samples and other quality records are kept beyond the recognised life of the product and are for a minimum of 1 one year.

Please notify us if you require a longer period.