

GMP policy Hamburger Containerboard

Hamburger Containerboard is manufacturer of paperboard and corrugated base papers, which are used, among other things, for the production of food packaging. Our products may come in direct or indirect contact with food. Therefore both, our products and our production processes, have to comply with relevant European and national regulations. The GMP policy of Hamburger Containerboard is based on the CEPI guideline “Good Manufacturing Practice for the Manufacture of Paper and Board for Food Contact” (September 2010, Issue 1).

For coordination purposes, Hamburger Containerboard has designated a process owner for GMP (Good Manufacturing Practice), who acts as an interface between management and production sites.

The following standards are implemented in each site:

- 1) The implementation of GMP requirements is anchored in the corporate policy.
- 2) Each site has designated a GMP representative for the internal management in agreement with the process owner for GMP.
- 3) Hazard analysis and risk assessment according to the internal standard are applied and controlled by hygiene representative at least once a year.
- 4) Training:
 - a) Personnel training: On the basis of the hazard analysis and risk assessment, it is determined, which employees have to be trained in which topic and interval; records are maintained.
 - b) Temporary, external staff and visitors are instructed on relevant hygiene requirements.
- 5) Auxiliary materials/chemicals management:
 - a) A procedure for the introduction of new auxiliary materials has been determined in accordance with legal requirements (food safety, REACH regulation).
 - b) Evidence on the used auxiliary materials shall be maintained (e.g. material register, safety data sheets, certificates of conformity).
 - c) Records of use for auxiliary materials shall be maintained to ensure traceability.
- 6) Monitoring and measurement of product:
 - a) Beside the standard quality assurance, at least every two years the products shall be analyzed by a qualified institute to verify food safety.
- 7) Glass and knife policy:
 - a) The use of glass and other brittle material (e.g. glass bottles) is not permitted in the following areas including control rooms: the production area and finished goods warehouse. In the kitchen / social rooms plates and similar objects (e.g. cups) are permitted.
 - b) Measures against glass breakage (lamps, windows) in accordance with the risk evaluation shall be defined, a glass register shall be maintained.
 - c) Generally, no use of snap-off knives (cutter); exceptions can be possible after conducted risk evaluation (e.g. laboratory) – in this case a register has to be maintained.
 - d) Near finished products during the last processing steps, loose fixing material (e.g. staples) is not permitted.

- 8) Eating and drinking:
 - a) Eating and drinking in the areas production, finished goods warehouse and laboratory is only permitted in control/social rooms (e.g. wet- and dry-end control rooms, assistant social rooms) and other defined rooms; exception: water is permitted in all areas.
 - b) Food has to be stored in designated fridges/lockers/shelves within the control and social rooms.
 - c) Facilities for hand washing shall be available in or near control and social rooms; if that is not possible: as second priority rest rooms with sufficient washing facilities have to be used. Alternatively, in cases that do not allow any other solution, disinfection facilities shall be installed. Details shall be evaluated in hazard analysis and risk assessment.
 - d) The transport of groceries (e.g. coffee, snacks) within the production and storage areas shall be evaluated in the hazard analysis and risk assessment and accordingly regulated.
- 9) Smoking:
 - a) Smoking is only permitted in designated areas, clearly separated from the final product. If necessary, ventilation systems/ air cleaner have to be installed.
- 10) Loose hair:
 - a) Long hair shall be tied back or secured by wearing a hairnet or a bump cap.
- 11) Workwear:
 - a) In all areas, the workwear, provided by employer, shall be worn.
 - b) Work clothes need to be stored separately from personal clothes.
 - c) It is not permitted to store shoes on lockers.
 - d) Changing rooms shall be designed in a way that ensures easy cleaning (e.g. shoe rack, no storage on lockers).
 - e) It is not permitted to wear work clothes outside the mill.
- 12) Personnel hygiene:
 - a) Before starting to work, after going to the toilet / using the lavatory, before and after eating, drinking or smoking, as well as in the case of very dirty hands, the hands shall be washed carefully, disinfected where appropriate (note the skin protection plan).
- 13) Diseases and injuries:
 - a) During handling of the final product, it shall be ensured that it cannot come in contact with open wounds – therefore open wounds must be treated as required.
 - b) Furthermore, in case of infectious diseases, the direct contact with the final product must be avoided.
- 14) Order and cleanliness:
 - a) Order and cleanliness are the basis of hygiene.
 - b) According to the risk evaluation, internal standards for optimal workplace and equipment conditions, waste handling, cleaning plans and control procedures may be set; records shall be kept.
 - c) Only hygienically impeccable means (e.g. cores, bungs, pallets, films and packaging paper) shall be used for packaging/finishing the final product. They must be visibly dry, clean and odorless.

15) Means of transportation - finished product:

- a) By contract it shall be ensured that transportation means meet defined transport requirements for the final products:
 - i) Clean, dry, undamaged loading areas,
 - ii) Undamaged tarpaulins,
 - iii) odorless (not moldy, musty, putrid).
- b) The final product shall be inspected before loading to ensure that it is free from any contamination (e.g. bird droppings).
- c) The compliance with the requirements must be ensured and recorded by using transportation means checks.

16) Pest control:

- a) The pest control and monitoring (rodents, flying and crawling insects) shall be internally arranged according to the risk evaluation and implemented by qualified external specialists.
- b) Records of pest control and monitoring shall be kept.

17) Hygiene incidents:

- a) In the case of a hygiene incident (e.g. broken glass, contamination of the product due to employee errors, oil leakage, contact with open wounds) it shall be recorded; measures of risk minimization shall be planned and implemented.
- b) If necessary, the goods in the warehouse must be blocked/retained.
- c) If the affected finished product has already been delivered to the customer, the information and call-back process has to be started according to the standardized procedure.
- d) The call-back process shall be tested at least every two years.
- e) Records shall be kept.

18) Outsourcing:

- a) The hygiene management requirements shall be extended to outsourced processes such as the subcontracted storage of finished products. Records shall be maintained.