



Charles Faram & Co Ltd

VACCP Plan

Created by Tim Luckham
Authorised by Paul Corbett

Document
No: QA 375

Issue No. 2

Reviewed:
Oct 2022

This plan conforms to the following legislation and regulations: -

The Food Safety & Hygiene (England) Regulations 2013

The Food Standards Act 1999

Weights and Measures Act 2005

Measuring Instruments Regulations 2016

European Regulation (EC) 834/2007 & 889/2008 (ORGANIC)

European Regulation (EC) 1935/2004 (FOOD CONTACT MATERIAL)

Study: Charles Faram & Co Ltd	VACCP ANALYSIS	Issue Number: 1
Prepared by: Tim Luckham	Date: May 2021	
Revised by: Rich Luckham	Date: Oct 2022	Reviewed: Annually

Changes to the Manual

May 2021: - VACCP Plan created and reviewed.

Oct 2022: - Reviewed and revised

Holders of the VACCP Manual

Electronic version (master copy) – Location - [Charles Faram VACCP Plan .doc](#)

Management Commitment

Proposed by: Tim Luckham

Approvers Name: Paul Corbett

VACCP Plan Approved: Oct 2022

Scope

VACCP, Vulnerability Assessment Critical Control Point is best defined as a management process to defend a food supply chain from any form of dishonest conduct that impacts detrimentally on the quality or authenticity of food and drink.

VACCP identifies how vulnerable various points in the supply chain are to the threat of economically- motivated adulteration.

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Pre-requisites

The pre-requisites are:

- Buildings are maintained and secure
- Equipment fit-for-purpose
- Planned maintenance schedule in operation
- All processing machines to use food grade oils and lubricants
- Supplier quality assurance; purchase to specification
- Housekeeping and hygiene
- Personal hygiene
- Workwear supplied
- Staff facilities in place
- Pest control in place and effective
- Policies in place to prevent glass and ceramics entering processing lines
- All products are batch controlled for total traceability
- Control of transport
- Staff training
- Hops supplied are dried to below 12% moisture
- Any pesticides used are done so within permitted levels. Pesticide and heavy metal residue are within permitted levels
- All packaging materials are suitable for purpose. Packing in contact with hops is of food grade.

VACCP Team Members

Paul Corbett (Managing Director)
 Russ Johnson (Warehouse Manager)
 Tim Luckham (Quality / Production Manager)
 Rich Luckham (Quality Assurance & Production Coordinator)

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Product Description

The products are mainly packaged hops. The hops are purchased in pockets and bales and are re-packaged and pressed into 5 kg or 20 kg food grade Freshpak bags. They are also processed in to Type 90 pellets in cartons of either 4 x 5kg, 2 x 10kg or 1kg food grade foil bags.

Intended Use of Products

The products are intended for use in the brewing process.

Table 1 **Impact Rating**

Impact rating	Impact	Definition
1	Low	Consumption of the fraudulent product might cause a Brewers product to be mildly affected and cause mild financial loss or pose a risk to human harm.
2	Moderate	Consumption of the fraudulent product might cause a Brewers product to be highly affected and cause large financial loss or potential human harm.
3	Severe	Consumption of the fraudulent product causes a Brewers product to be hugely affected and cause major financial loss or imminent human harm

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Table 2 **Likelihood rating**

Likelihood rating	Likelihood	Definition
1	Low	Food Fraud is present intermittently and if control of the product was absent at this point the vulnerability would be present in only one part of one batch of product.
2	Moderate	Food Fraud is present intermittently and if control of the product was absent at this point the vulnerability would be present in the whole of one batch of product.
3	Severe	Food Fraud is present continuously and if control of the product was absent at this point the vulnerability would affect all batches of product.

Risk = Impact x likelihood

Any vulnerability scoring 3 or more is a potential breach of food fraud and must be included in the VACCP study.

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POTENTIAL FOOD FRAUD AND VULNERABILITY MEASURES AT CHARLES FARAM & CO LTD

PROCESS STEP	VULNERABILITY DESCRIPTION	IMPACT	LIKELIHOOD	RISK	CONTROL MEASURES	VCP
Bale Storage Pesticide Results & Spray records from Hop Grower Tests	External Test results inconclusive or score highly on MRL	1	1	1	Composite samples are taken from the farm and stringently tested. Any Hops falling out of Regulation is rejected.	
Hops from supplier	High moisture content	1	1	1	Moisture meter checks taken and recorded	
Organic Hops from Supplier	Organic Hops Not actually organic	2	2	4	Check documentation against incoming bales	VCP1
FLT delivering into store	Delivery of wrong hop bales against production paperwork	1	1	1	Documents checked against bale unload and production paperwork	
Storage of Bales	Bales of differing varieties on 1 pallet	1	1	1	Bales visually checked, moisture tested stacked and wrapped each variety separated	
Cold store / Production areas	Pest contamination	1	1	1	Pest Control in place	

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PROCESS STEP For 5kg Freshpak	VULNERABILITY DESCRIPTION	IMPACT	LIKELIHOOD	RISK	CONTROL MEASURES	VCP
Clean down for Organic	Contamination of organic hops with non-organic hops or substances	2	2	4	Complete organic clean down procedure & check list	VCP 1
Human Interaction	Contamination from operators	1	1	1	PPE worn by all production staff	
Loading Bale onto Conveyer	Bale cloth or other foreign object enters processing plant	1	1	1	Visual Inspections carried out. Emergency stops in place	
Loading hop batch passes across magnets and gravity trap	Contamination from metals, wood, glass and heavier objects not already removed	3	1	3	Gravity trap and magnets in place	VCP 2
Weigh 5 Kilo	Computerized weigh scales	1	1	1	Product is weighed again as final check	
Press	Mechanical failure leaking hydraulic fluid	1	1	1	Physical viewing of leaks Planned maintenance	
Foil bags	Contamination from foil	1	1	1	Food grade material from approved suppliers	
Manually bale into foil bags	Contamination from operator	1	1	1	Operators supplied with PPE	
Weigh (manually remove hops to weight)	Scales not calibrated. Human error- Lack of attention	1	2	2	Calibration Schedule and Certificates in place	
Remove oxygen from packs	Nitrogen & CO2 tank not functioning correctly	2	1	2	Procedural testing for residual oxygen (2-hour checks)	

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Label foil bag	Incorrect label attached to product	2	2	4	Operator to check information against production document	VCP 3
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PROCESS STEP	VULNERABILITY DESCRIPTION	IMPACT	LIKELIHOOD	RISK	CONTROL MEASURES	VCP
Label carton	Incorrect label attached to product	2	2	4	Operator to check information against production document	VCP 3
Pack into outer carton	No Vulnerabilities					
Stack on pallets	Wrong carton on wrong pallet	1	1	1	One batch produced at any one time	
Store	Product stored incorrectly. Gets mixed with other varieties	1	1	1	Products stored in separate bays. Warehouse staff to ensure tidy bays	
Despatch	Wrong product picked against Customer requirement	1	2	2	Orders checked by supervisor pre despatch	
<u>Additional steps for 20 kilo bags</u>						
Split pocket / bale in 4	Contamination from operator	1	1	1	Operators supplied with PPE	
PROCESS STEP for T90 Pellets						
Clean down for Organic	Contamination of organic hops with non-organic hops or substances	2	2	4	Complete organic clean down procedure & check list. Purge 30kg hop pellets through plant (and discard	VCP 1

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					/ sell as non-organic)	
PROCESS STEP	VULNERABILITY DESCRIPTION	IMPACT	LIKELIHOOD	RISK	CONTROL MEASURES	VCP
Loading Bale onto Conveyer	Bale cloth or other foreign object enters processing plant	1	1	1	Visual Inspections carried out. Emergency stops in place	
Loading hop batch passes across magnets and gravity trap	Contamination from metals, wood, glass and heavier objects not already removed	3	1	3	Gravity trap and magnets in place	VCP 2
Into pellet hopper	String/twine mixed in with pellets	1	2	2	Air filter in place to remove any lighter objects (string / twine etc	
Into auto weigher	Weigher not calibrated/ Fails. Gets filled with hop dust	1	1	1	System calibrated with Records and Visual checks in place	
Into bagging machine - foil bags	Contamination from foil	1	1	1	Approved suppliers – food grade material	
Remove oxygen from forming tube	Nitrogen	1	1	1	Procedural testing for residual oxygen	
Input information for bag label	Incorrect information entered into labelling computer	2	2	4	Operator to check information against production document	VCP 3
Pack into carton and label carton	Carton label not matching bag label	2	2	4	Operator to check information against production document	VCP 3
Stack on pallets	Wrong carton on wrong pallet	1	1	1	One batch produced at any one time	

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Store	Product stored incorrectly. Gets mixed with other varieties	1	1	1	Products stored in separate bays. Warehouse staff to ensure tidy bays
Despatch	Wrong product picked against Customer requirement	1	2	2	Orders checked by supervisor pre despatch

Vulnerability & Food Fraud Control Points were identified using a decision tree

PROCESS STEP	VULNERABILITY DESCRIPTION	CONTROL MEASURES	VCP	CRITICAL LIMITS	MONITORING PROCEDURES	CORRECTIVE ACTIONS
Organic processing	Contamination from non-organic hops	Complete clean down of all machinery and work area's	VCP1	Operators follow procedures for cleaning	Production Supervisor inspects processing plant prior to Organic production	Operator stops production. Processing plant is deep cleaned, and Organic Hops processed separately
Freshpak & T90 process hop material passes over magnets and gravity trap	Contamination from metals and heavier objects not already removed	Gravity trap and magnets in place	VCP 2	Operator checks and cleans gravity trap and magnets daily	Operator records checks on the daily log sheet. The records are monitored by the Production & Quality Manager	Operator stops processing. Supervisor quarantines packed product for checking. Released only by authorisation of Production & Quality Manager
Labelling of bag and box on Freshpak & T90 finished product	Information on bag & box label not matching against production document	Operator checks label information against production paperwork	VCP 3	Operator ensures correct information prior to processing	Operators and supervisor make visual checks throughout processing	On discovery of misinformation. Labels are recalled, corrected and stock is checked for incorrect label.