



# Charles Faram & Co Ltd TACCP Plan

Created by Rich Luckham  
Authorised by Tim Luckham

Document  
No: QA379

Issue No. 1

Issued:  
Nov 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)**

## **Changes to the Manual**

**November 2022: - TACCP Plan created.**

## **HOLDERS of the TACCP Manual**

**Electronic version (master copy) – Location - [Charles Faram TACCP Plan QA379 .doc](#)**

Study: Charles Faram & Co Ltd	TACCP ANALYSIS	Issue Number: 1
Prepared by: Rich Luckham	Date: November 2022	

## **Management Commitment**

**Proposed by:** Rich Luckham (Quality Assurance & Production Coordinator)

**Approvers Name:** Tim Luckham (Quality & Production Manager)

**TACCP Plan Approved:** November 2022

## **Scope**

TACCP, Threat Assessment Critical Control Point is best defined as a management process with the goal of preventing malicious and intentional product contamination in the food industry. The process helps to proactively identify and manage control points in the supply chain that are susceptible to tampering.

## **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

Study: Charles Faram & Co Ltd	TACCP ANALYSIS	Issue Number: 1
Prepared by: Rich Luckham	Date: November 2022	

- 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.

### **TACCP Team Members**

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

### **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 into 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.

Study: Charles Faram & Co Ltd	TACCP ANALYSIS	Issue Number: 1
Prepared by: Rich Luckham	Date: November 2022	

**Table 1**                      **Impact Rating**

Impact rating	Impact	Definition
1	Low	Consumption of the deliberately contaminated 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 deliberately contaminated product might cause a Brewers product to be highly affected and cause large financial loss or potential human harm.
3	Severe	Consumption of the deliberately contaminated product causes a Brewers product to be hugely affected and cause major financial loss or imminent human harm

**Table 2**                      **Likelihood rating**

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

Study: Charles Faram & Co Ltd	TACCP ANALYSIS	Issue Number: 1
Prepared by: Rich Luckham	Date: November 2022	

**Risk = Impact x likelihood**

**Any threat scoring 3 or more is a potential intention to cause harm and must be included in the TACCP study.**

## POTENTIAL INTENTIONAL CONTAMINATION MEASURES AT CHARLES FARAM & CO LTD

PROCESS STEP	INTENTIONAL THREAT DESCRIPTION	IMPACT	LIKELIHOOD	RISK	CONTROL MEASURES	TCCP
Bale Storage Pesticide Results & Spray records from Hop Grower Tests	Grower intentionally using banned Pesticides or excessive quantities to enhance yield	3	1	3	Composite samples are taken from the farm and stringently tested. Any Hops failing Regulation are rejected	X 1
Hops from supplier	High moisture content. Not kiln dried enough Weight notes incorrect	2	2	4	Moisture meter checks taken and recorded. Hop bales above satisfactory moisture levels are returned to grower for re-drying	X 1
Organic Hops from Supplier	Organic Hops Not actually organic	2	2	4	Check documentation against incoming bales Organic Growers are Certified	X 2
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 /	Stock damaged by FLT.	1	1	1	Warehouse staff trained in control of	

Study: Charles Faram & Co Ltd	TACCP ANALYSIS	Issue Number: 1
Prepared by: Rich Luckham	Date: November 2022	

Production areas	Moved and not located				stock and safe working practices	
------------------	-----------------------	--	--	--	----------------------------------	--

PROCESS STEP For 5kg Freshpak	INTENTIONAL THREAT DESCRIPTION	IMPACT	LIKELI HOOD	RISK	CONTROL MEASURES	TCCP
Clean down for Organic	Contamination of organic hops with non-organic hops or substances	2	2	4	Complete organic clean down procedure & check list	X 2
Human Interaction	Contamination from operators. Personal belongings/ Sharps	2	1	2	PPE worn by all production staff. Staff trained in safe practices	
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	X 3
Weigh 5 Kilo	Computerized weigh scales	1	1	1	Product is weighed again as final check	
Press	No threats					
Foil bags	Contamination from foil	1	1	1	Food grade material from approved suppliers	
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 tank not functioning correctly causing oxidisation of hops	2	1	2	Procedural testing for residual oxygen (2-hour checks)	
Label foil bag	Incorrect label attached to product	2	2	4	Operator to check information against production document	X 4

Study: Charles Faram & Co Ltd	TACCP ANALYSIS	Issue Number: 1
Prepared by: Rich Luckham	Date: November 2022	

PROCESS STEP	INTENTIONAL THREAT DESCRIPTION	IMPACT	LIKELIHOOD	RISK	CONTROL MEASURES	TCCP
Label carton	Incorrect label attached to product	2	2	4	Operator to check information against production document	X 4
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	
<b><u>Additional steps for 20 kilo bags</u></b>	<b>INTENTIONAL THREAT DESCRIPTION</b>					
Split pocket / bale in 4	Contamination from operator. Personal belongings/ Sharps	2	1	2	Operators supplied with PPE	
<b>PROCESS STEP for T90 Pellets</b>						
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 / sell as non-organic)	X 2

Study: Charles Faram & Co Ltd	TACCP ANALYSIS	Issue Number: 1
Prepared by: Rich Luckham	Date: November 2022	

PROCESS STEP	INTENTIONAL THREAT DESCRIPTION	IMPACT	LIKELIHOOD	RISK	CONTROL MEASURES	TCCP
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	X 3
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 tank not functioning correctly causing oxidisation of hops	2	1	2	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	X 4
Pack into carton and label carton	Carton label not matching bag label	2	2	4	Operator to check information against production document	X 4
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	



Study: Charles Faram & Co Ltd	TACCP ANALYSIS	Issue Number: 1
Prepared by: Rich Luckham	Date: November 2022	

## Threat Assessment Control Points were identified using a decision tree

PROCESS STEP	INTENTIONAL THREAT DESCRIPTION	CONTROL MEASURES	TCCP	CRITICAL LIMITS	MONITORING PROCEDURES	CORRECTIVE ACTIONS
Hops from supplier.  Pesticide and moisture tests.	Contamination from excessive pesticide use.  Hops not dried enough.	Samples taken and scientifically tested.  Moisture tests on all hops.	1	Pesticides to be within specific range set out by legislation.  Moisture of bale to be within 5% & 12%	Samples sent to independent lab for analysis.  Moisture tests carried out on every bale.	Bales returned to supplier if failure of pesticides.  Supplier to re-dry bale if moisture content too high.
Organic processing.	Contamination from non-organic hops.	Complete clean down of all machinery and work areas.	2	Operators follow specific procedures for organic cleaning. Organic HACCP in place.	Production Supervisor inspects processing plant prior to Organic production.  Organic check sheets to be completed.	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.	3	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.	4	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.